

**INTEGRATED CONTINGENCY PLAN**

**HP HOOD INC.**

**349 PARK AVENUE**

**PORTLAND, MAINE**

**PRINT NAME SIGN NAME DATE**

John Marchildon \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 11/16/18

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| ***APPLICABLE REGULATORY REQUIREMENTS*** | ***CHAPTER OF INTEGRATED CONTINGENCY PLAN*** |
| --- | --- |
| **OSHA Emergency Response Plan**  **29 C.F.R § 1910.120(q)** |  |
| Pre-emergency planning and coordination with outside parties .120(q)(2)(i) | Chapter 18 |
| Personnel roles, lines of authority .120(q)(2)(ii) | Chapter 9 |
| Training .120(q)(2)(ii) | Chapter 7 |
| Communication .120(q)(2)(ii) | Chapter 5 |
| Emergency recognition and prevention .120(q)(2)(iii) | Chapters 4 and 10 |
| Evacuation routes, safe distances and places of refuge .120(q)(2)(iv) & (vi) | Chapter 13 |
| Site Security and Control .120(q)(2)(v) | Chapter 14 |
| Decontamination .120(q)(2)(vii) | Chapter 15 |
| Medical treatment and first aid .120(q)(2)(viii) | Chapters 6 and 12 |
| Emergency alerting and response procedures .120(q)(2)(ix) | Chapters 5, 11 and 12 |
| Critique of response and follow-up .120(q)(x) | Chapters 17 |
| Personal protective equipment and emergency equipment 120(q)(2)(xi) | Chapter 6 |
| Emergency response procedures (q)(3) | Chapter 12 |
| **OSHA Process Safety Management**  **29 C.F.R. § 1910.119(n)** |  |
| Emergency Planning and Response | See OSHA Emergency Response Plan  29 C.F.R. § 1910.120(q), above |
| Emergency response procedures | Chapter 12 |
| **OSHA Hazard Communications Plan**  **29 C.F.R. 1910.1200** |  |
| Employee Information and Training 1200 (h) | Chapters 7 and 19 |
| **Maine Facility Emergency Response Plans**  **37-B M.R.S.A. § 795** |  |
| Mutual Aid Agreements 795(1)(H) | Chapter 18 |
| Employee Training and Testing Programs 795(1)(C) | Chapter 7 |
| Response Equipment and Protective Clothing 795(1)(D) | Chapter 6 |
| Emergency Coordinator and Alternates 795(1)(A) | Chapter 9 |
| Notification 795(1)(E) | Chapters 11 and 16 |
| Facility and Community Evacuation 795(1)(E) | Chapter 13 |
| Emergency Warning Systems 795(1)(B) | Chapter 5 |
| Emergency Health Treatment Procedures 795(1)(D) & (F) | Chapter 12 |
| Transportation Routes and Methods for Extremely Hazardous Substances 795(1)(F) | Chapter 20 |
| Insurers 795(1)(G) | Chapter 21 |

|  |  |
| --- | --- |
| **Maine Facility Emergency Response Plans (Cont.)**  **37-B M.R.S.A. § 795** |  |
| Emergency Health Treatment Procedures 795(1)(D) & (F) | Chapter 12 |
| Transportation Routes and Methods for Extremely Hazardous Substances 795(1)(F) | Chapter 20 |
| Insurers 795(1)(G) | Chapter 21 |
| **Maine Hazardous Matter Spill Prevention Control and Clean-up (SPCC) Plan**  **38 M.R.S.A. § 1318-C** |  |
| Mutual Aid Agreements 1318-C(1)(O) | Chapter 18 |
| Employee Training Programs 1318-C(1)(E) | Chapter 7 |
| General Response and Protocols by Substance Class 1318-C(1)(L) | Chapter 12 |
| Emergency Response Equipment List 1318-C(1)(D) | Chapter 6 |
| Emergency Coordinators and On-site Employee Responders 1318-C(1)(H) | Chapter 9 |
| Evacuation Procedures and Assembly Points 1318-C(1)(1) | Chapter 13 |
| Discharge Detection Devices and Emergency Warning Systems 1318-C(1)(G) | Chapter 5 |
| Notification Procedures 1318-C(1)(J) & (K) | Chapter 11 and 16 |
| Amendments of Plan 1318-C(3) | Chapter 1 |
| Containment and Diversionary Equipment 1318-C(1)(B) | Chapter 3 |
| Inspection, Maintenance and Testing Procedures for Storage and Containment Areas 1318-C(1)(C) | Chapter 4 |
| Promulgation Statement 1318-C(1)(P) | Chapter 1 |
| Submission of Plan 1318-C(2) | Chapter 1 |
| Hazardous Matter and Substances Covered 1318-(1)(A) | Chapter 2 |
| On-site Containment, Treatment, and Removal Plans 1318-C(7)(m) | Chapter 3 |
| Record-keeping Process for Implementation of the Plan 1318-C(1)(N) | Chapter 1 |

**RECORD OF CHANGES**

|  |  |  |
| --- | --- | --- |
| **DATE** | **DESCRIPTION OF CHANGE (S)** | **PAGE #** |
| 12/2000 | ICP revised from draft to final | Many |
| 3/2001 | ICP second round changes | Many |
| 5/2001 | ICP third round of changes | Many |
| 4/2002 | Update changes…staffing updates, grammatical updates. | 8, 9, 11, 12, 13, 14, 17, 18, 19, 20, 27, 30, 43, 50, 51, 52, 74 |
| 4/2003 | ICP annual review | Many |
| 5/2004 | ICP Annual Review | Many |
| 7/2005 | ICP Annual Review | 8-11,16,21 |
| 11/2008 | ICP Annual Review/staff updates | Many |
| 12/15 | ICP Review/Staff Updates/Floor Plans | 2, 14, 21, 22, 23, 35, 54, 55, 77, |
| 07/16 | ICP Review/Phone Update/Chemical Update | 13, 40, 41 |
| 12/20/16 | ICP Review/Phone Update/Chemical Update | 47,49, |
| 12/23/16 | Updates/Suggestions from W & C | 5,11, 13 |
| 01/04/17 | Plant Manager Change, clerical changes | Many |
| 09/06/17 | Changes to Index | Multiple |
| 04/13/2018 | Evacuation Roles and Responsibilities | 51, 53 |
| 11/16/2018 | ICP review, contact info and Business Continuity | Many and 87 |
| 3/25/2019 | Update chapter 3 and table 3-1, Chapter 9, Chapter 16 Notifications | 12,13,14, 36,37, 63 |

# PLAN OVERVIEW

## Plant And Process Description

The Portland facility of HP Hood LLC. (HP Hood) is located on 349 Park Avenue in Portland, Maine (see Figure 1-1). The facility is located in a primarily commercial area and is approximately one mile away from the central business district of Portland. The major motor vehicle route closest to the plant is US Route 295, which can be accessed via Exit 5. The population within one mile radius of the plant is approximately 2,000. The plant has approximately 80 employees, with another 52 employees that work off site as part of the distribution division.

HP Hood processes and packages fluid milk as a commodity to be sold to consumers throughout Maine and New Hampshire. HP Hood's corporate offices are located in Lynnfield, Massachusetts.

The Plant Manager is the primary employee responsible for the maintenance and implementation of this Integrated Contingency Plan (ICP). The main phone number for the facility is (207) 774-9861.

## Purpose of this Plan

This plan describes how HP Hood handles emergencies associated with fires, injuries, and releases and spills of hazardous and extremely hazardous chemicals. Specifically, it describes:

1. The steps HP Hood takes to prevent "hazardous material incidents";
2. The response actions HP Hood employs to minimize or eliminate injuries to human health and the environment during "emergency and non-emergency incidents" (defined in Chapter 10);
3. The remedial and corrective actions HP Hood implements after a "hazardous material emergency incident" to reduce or eliminate the possibility of such incidents reoccurring in the future; and
4. How HP Hood complies with a number of state and federal environmental and employee safety laws and rules.
5. To describe actions taken to protect the product that is stored on site.
6. To describe actions taken to identify and isolate product affected by the crises.
7. To describe actions that would be taken to ensure minimal customer interruption due to shortages in product inventory

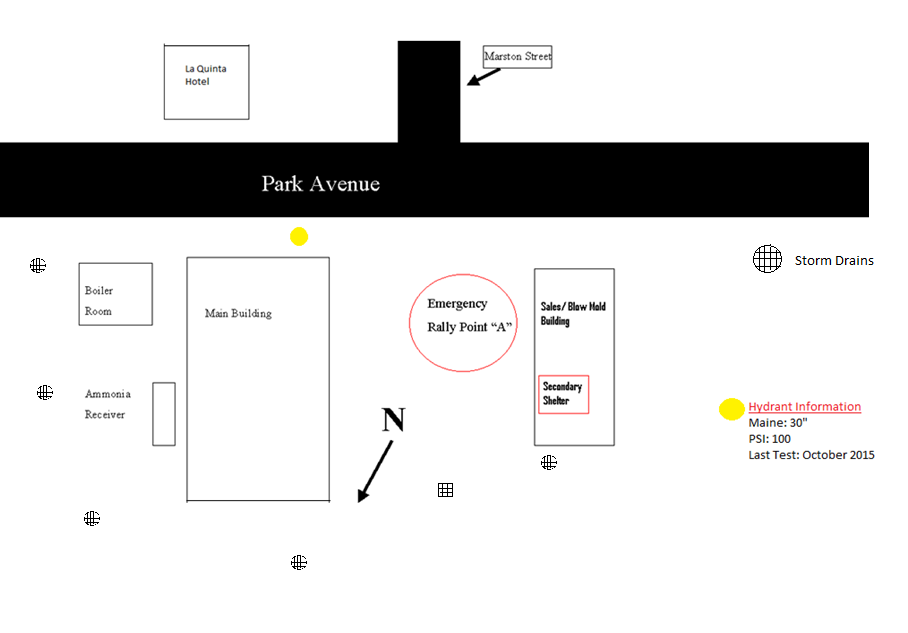
## Laws And Regulations Satisfied By This Integrated Contingency Plan

Because HP Hood (1) uses hazardous chemicals; (2) allows designated, trained employees to respond to some “hazardous material emergency incidents”; and (3) has extremely hazardous substances above threshold planning levels, it must comply with the following federal and state emergency response and accident prevention laws:

The Occupational Safety and Health Administration (OSHA) has adopted regulations which require HP Hood to adopt a Hazard Communication Plan, 29 C.F.R. § 1910.1200; and an Emergency Response Plan, 29 C.F.R. § 1910.120(q)(2).

Maine’s Department of Environmental Protection (MEDEP) has adopted rules which require HP Hood to prepare a facility emergency response plan, 37-B M.R.S.A. § 795.

Figure 1-1: Site Location



In addition, Maine law allows HP Hood to take advantage of reduced reporting requirements (e.g. reportable quantities) for hazardous material releases, if it adopts a hazardous matter Spill Prevention Control and Cleanup (hazardous matter SPCC) plan which addresses the criteria listed in 38 M.R.S.A. § 1318-C(1).

Because many of the laws cited above require HP Hood to adopt plans or reports that contain similar requirements and information, this Integrated Contingency Plan (ICP) has been adopted to cover all of the requirements cited above.

Each Chapter of this ICP identifies the federal and state laws and regulations it satisfies. A Regulatory Requirements Cross Reference Table in the beginning of this plan identifies applicable regulatory requirements and the Plan Chapter(s) that satisfy these rules.

## Plant Areas Covered By This Integrated Contingency Plan

The facility is located on a 1.6 acre lot which consists of the main building, a boiler house, a blow mold bottle manufacturing/sales office building, and a parking lot. This ICP covers the entire facility and all operations.

## Promulgation Statement/Management Approval

HP Hood is committed to conducting plant operations in a safe and environmentally responsible manner. Precautionary measures, including the adoption of this ICP, have been taken to minimize the potential of incidents which could result in emergencies.

The plant is designed, constructed, maintained and operated to minimize the possibility of a fire, explosion and any unplanned, sudden, or non-sudden release of hazardous material to air, soil, surface water or groundwater. This ICP is also designed to minimize hazards to human health and the environment potentially caused by fires, explosions, and any unplanned release of hazardous material to air, soil, surface water or groundwater at or from the plant.

The provisions of this ICP will be carried out immediately whenever there is an emergency incident (see Chapter 10) caused by fire; explosion; or release or spill of hazardous material at or from the plant; or medical emergency.

This ICP contains guidance to assist operating personnel and emergency response personnel in determining specific courses of action and responsibilities under foreseeable hazardous material events, fires, and medical emergencies. Appropriate emergency response by all involved include:

1. Prompt response to injuries to human health and the environment;
2. Minimization of property damage and threats to the community; and
3. The prompt and safe resumption of plant operations.

HP Hood management fully supports the adoption and implementation of this plan.

## Submission Of The Plan

A copy of this ICP was emailed/mailed to the following entities (See 37-B M.R.S.A. § 795(1)) **in April 2019.**

|  |  |
| --- | --- |
| Maine Department of Environmental Protection  Hazardous Materials Control  Southern Maine Regional Office  312 Canco Road  Portland, Maine 04103 | Local Emergency Planning Committee  County of Cumberland  EmergencyManagement Agency  22 High Street  Windham, Maine 04062 |
| State Emergency Response Commission  Maine Emergency Management Agency  State Office Building  Augusta, Maine 04333 | Portland Fire Department  380 Congress Street  Portland, Maine 04101 |
| Portland Public Works Department  55 Portland Street  Portland, ME 04102 | Maine Medical Center  22 Bramhall Road  Portland, ME 04102 |

## Amendment Of The Plan

This Plan is intended to be an integral part of HP Hood's operations. To increase its effectiveness, it will be reviewed and updated by HP Hood personnel and management whenever:

1. It fails in an emergency;
2. The plant changes in its design, construction, operation, or maintenance in a manner likely to impact its effectiveness;
3. Some other circumstance significantly increases the potential for fires, explosions, or releases of hazardous materials or changes the response necessary in an emergency;
4. Annual exercises, or drills suggest amendment is necessary;
5. The emergency coordinators change or emergency equipment list changes significantly; or
6. An environmental regulator with jurisdiction over the plant deems a change to be necessary.

See 38 M.R.S.A. § 1318-C(3). In addition, it is HP Hood's policy for the Location Safety Specialist to review and evaluate this Plan annually from the date of its original adoption. If a review suggests this Plan should be amended, it will be as soon as practicable, but always within six months. Whenever this Plan is amended, all plan recipients are provided with the changes to insert into their controlled copies and the changes are recorded on the "Record of Changes" sheet at the front of this ICP.

## Internal Plan Copies

Copies of this Plan are located at the following locations: (1) EHS Manager’s office; (2) the Front Desk; (3) Shared Folder Path: M:\Portlandpub\Safety\_Portland\ICP\Current Updated Version; (4) Plant Managers Office; (5) QA Managers Office

When amendments are necessary, copies of the amendments will be included in all plant copies and sent to all outside plan recipients listed in Section 1.6 above.

# Hazardous Material and Applicable Reportable Quantities

## Reportable Quantities For HP Hood’s Hazardous Materials

This Chapter identifies the hazardous materials covered by this ICP (see Table 2-1) and lists applicable reportable quantities (RQs), in pounds and/or gallons (for liquids), for those materials that have RQs. HP Hood reports releases, leaks, discharges, and spills (collectively referred to as “releases”) of hazardous material to the environment in a quantity equal to or exceeding an applicable RQ in any 24-hour period, as specified in 40 C.F.R. §§ 302.4, 302.5, 302.6(b)(1), and 355 Appendix A, or if the release spreads beyond the facility boundary 38 M.R.S.A. § 1318-B(1).[[1]](#footnote-1)

The RQs for the hazardous material listed in Table 2-1, were determined in accordance with 40 C.F.R. §§ 302.4, 302.5, 302.6 and 355 Appendix A (July 1, 1998) as incorporated by 38 M.R.S.A. § 1318-B(1). Specifically:

Releases of mixtures or solutions (including hazardous wastes) of hazardous substances are subject to the following notification requirements:

1. If the quantity of all the hazardous constituent(s) of the mixture or solution is known, notification is required where an RQ[[2]](#footnote-2) of any hazardous constituent is released; or
2. If the quantity of one or more of the hazardous constituent(s) of the mixture or solution is unknown, notification is required where the total amount of the mixture or solution released exceeds the RQ for the hazardous constituent with the lowest applicable RQ.

Notification requirements referenced above are in accordance with 40 C.F.R. §§ 302.6(b)(1) and 302.5(a).

Where a product or mixture appearing on Table 2-1 contains more than one hazardous constituent, all RQs are listed, and the lowest applicable RQ is used to determine whether a release is reportable. As soon as HP Hood has knowledge that there has been a release to the environment that equals or exceeds an applicable RQ in any 24-hour period, it immediately[[3]](#footnote-3) reports the release to all appropriate agencies per 40 C.F.R. § 302.6(a); 38 M.R.S.A. § 1318-B; and Chapter 16 of this plan.

HP Hood reports all hazardous material releases to the environment above RQs, other than releases that are hazardous solely because they display the corrosivity characteristic. In accordance with Maine law, HP Hood does not report releases of corrosive products which do not display other hazardous characteristics and are not listed hazardous waste if the release can be neutralized prior to being discharged to the Portland wastewater treatment plant 38 M.R.S.A. § 1319-L.

In addition to the chemicals listed on Table 2-1, HP Hood uses and stores a number of chemicals and commercial chemical products in small quantities. These chemicals and products are located primarily in the laboratory and maintenance area in the main building. While these chemicals and products may contain hazardous substances, spills and releases of these products cannot trigger reporting requirements because the maximum amounts of hazardous substance which can spill are lower than the lowest applicable RQ. If any of these materials are released, they will be addressed in accordance with this Integrated Plan, but will not be reported to outside agencies unless circumstances require reporting (e.g., outside assistance or emergency treatment is needed).

In developing Table 2-1, HP Hood relied on information contained in manufacturers' material safety data sheets (MSDSs) and/or process knowledge 29 C.F.R. § 1910.1200(d).

**Chemical Emergency Procedure**

1. Immediately evacuate area
2. Immediately call the following
   * John Marchildon: 413-426-3946
   * Richard Seiler: 207-252-0771
   * Jerry Witham: 207-939-5715
   * Keith Sturgis: 617-4482445
   * Remi Fluette: 603-568-9436
3. Without placing yourself in danger, prevent spill from entering drains or outside environment. Spill kits are located on CIP platform and bulk chemical mezzanine.
4. Determine if spill exceeds reportable quantity (refer to chart on next page). If yes immediately notify:
   * National Response Center: 1-800-424-8802
   * Maine Emergency Management Agency: 1-800-452-8753
   * Cumberland County LEPC: 207-8926785

Table 2-1 Federal Reportable Quantities for Hazardous Substance Releases

|  |  |  |
| --- | --- | --- |
| ***Chemical Name*** | ***CAS #*** | ***RQ*** |
| Ammonia | 7664-41-7 | Any spill is to be reported |
| Hydrogen Peroxide | 7722-84-1 | Any spill is to be reported |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Chemical Name** | Pounds Per Gallon | Chemical | CAS Number | Gallons to reach  Maine RQ |
| AC-3 | 9.90 | Phosphoric Acid | 7664-38-2 | Any spill is to be reported |
| PPE Requirements | Use chemical splash goggles. For continued or sever exposure wear a face shield over the goggles. Use chemical resistant, impervious gloves. Use synthetic apron, or other protective equipment as necessary to prevent skin contact. Avoid breathing vapors, sprays or mists | | | |
| Accidental Release Measures |  | | | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Chemical Name** | Pounds Per Gallon | Chemical | CAS Number | Gallons to reach  Maine RQ |
| **AC-101** | 12.74 | Sodium Hydroxide | 1310-73-2 | Any spill is to be reported |
| **PPE Requirements** |  | | | |
| **Accidental Release Measures** |  | | | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Chemical Name** | Pounds Per Gallon | Chemical | CAS Number | Gallons to reach  Maine RQ |
| **EXELERATE CIP Plus** | 9.65 | Sodium Hydroxide, Sodium Hypochlorite | 1310-73-2  7681-52-9 | Any spill is to be reported |
| **PPE Requirements** |  | | | |
| **Accidental Release Measures** |  | | | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Chemical Name** | Pounds Per Gallon | Chemical | CAS Number | Gallons to reach  Maine RQ |
| **SANI-GLIDE** | 8.99 | NONE |  | Any spill is to be reported |
| **PPE Requirements** |  | | | |
| **Accidental Release Measures** |  | | | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Chemical Name** | Pounds Per Gallon | Chemical | CAS Number | Gallons to reach  Maine RQ |
| **Vortexx** |  | Peracetic Acid | 79-21-0 | Any spill is to be reported |
| **PPE Requirements** |  | | | |
| **Accidental Release Measures** |  | | | |
| **Chemical Name** | Pounds Per Gallon | Chemical | CAS Number | Gallons to reach  Maine RQ |
| **Enforce LP** | 9.76 | Sodium Hydroxide, Sodium Hypochlorite | 1310-73-2  7681-52-9 | Any spill is to be reported |
| **PPE Requirements** |  | | | |
| **Accidental Release Measures** |  | | | |

# STORAGE, CONTAINMENT, AND DIVERSIONARY STRUCTURES

This Chapter identifies and describes HP Hood’s bulk (e.g., greater than 55 gallons) chemical and oil storage containers, related secondary containment structures, piping, and transfer locations. This Chapter satisfies many of the requirements of 38 M.R.S.A. § 1318-C(1)(B). A summary of this information is provided in Table 3-1.

HP Hood stores hazardous and non-hazardous substances in tanks, drums, and smaller containers throughout the facility. Generally, these tanks and storage containers are contained in dikes and/or are located in buildings that will prevent a release from entering the outside environment (collectively referred to as “secondary containment”). HP Hood considers a tank or building to provide secondary containment if its containment dike or the building is capable of holding at least 110% of the container’s contents. The location and amounts of various bulk hazardous chemicals used at the facility are listed below and tabulated in Table 3-1. Figure 3-1 shows the location of the bulk hazardous chemical storage tanks and drums.

## Ecolab AC-3

AC-3 used for cleaning dairy equipment. It is stored in a 1500 gallon tank on the first floor mezzanine near the center of the building in the dry storage hall. There is a secondary containment wall around this tank which is capable of containing the entire contents of the tank.

## Ecolab AC-101

AC-101 is used as a cleaning agent throughout the facility. Its primary function is for removal of fats and other organics from contact and non-contact surfaces. It is stored in a 1500 gallon tank on the first floor mezzanine near the center of the building in the dry storage hall. There is a secondary containment wall around this tank which is capable of containing the entire contents of the tank.

## Anhydrous Ammonia

Anhydrous ammonia is used as a refrigerant in a facility wide system that cools milk during processing and storage. Ammonia is present at this facility in a pressurized, totally enclosed system in various states (gas and liquid) at various pressures (10 psi to 190 psi). If released, it would be in a gaseous state.

Ammonia is stored outside in a 6,000 pound receiver on the northeast side of the main building. The ammonia receiver is enclosed in a chain-link fence that is accessible only to authorized Hood employees and contractors. There is a 250 gallon ammonia transfer tank in the cellar which transfers ammonia from the receiver to three compressors in parallel. Both the ammonia receiver and the transfer tank have low level detectors and alarms to indicate spills and leaks.

## Ecolab Exelerate CIP Plus

Exelerate CIP Plus is a cleaning solution used to remove protein from surfaces which contact milk. It is stored in a 1500 gallon tank on the first floor mezzanine near the center of the building in the dry storage hall. There is a secondary containment wall around this tank which is capable of containing the entire contents of the tank. The CIP tanks consist of two wash and two rinse tanks (300 gallons each) which contain ½ to 1 percent of Benefit in solution.

## Ecolab Enforce LP

Enforce LP is used for cleaning dairy equipment and is stored in two 55-gallon drums within a concrete dike in the Production area. The dike is capable of containing the entire contents of a drum.

## Ecolab Sani-Glide

Sani-Glide is a water based lubricant used for lubricating conveyors. It is stored in a 1500 gallon tank on the first floor mezzanine near the center of the building in the dry storage hall. There is a secondary containment wall around this tank which is capable of containing the entire contents of the tank.

## Ecolab Ster-Bac Quat

Ster-bac quat is a quat sanitizer used for the door sprayer by the dumpster area. It is stored in a 55 gallon containers with a concrete dike in the production area.

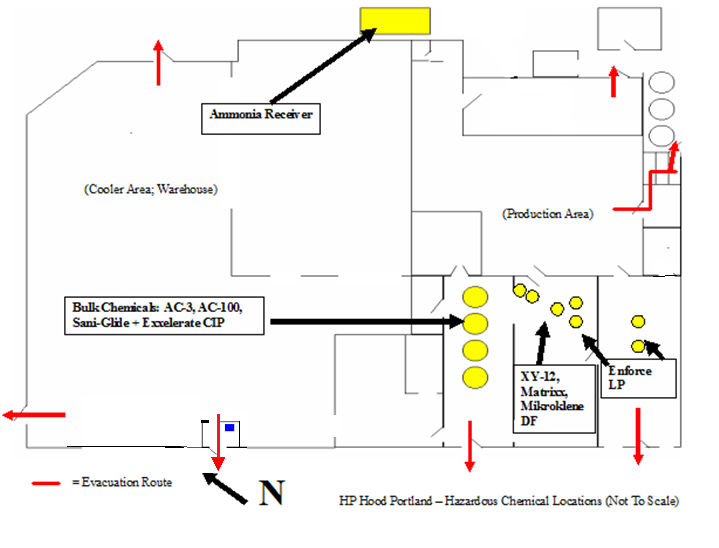
**3.10 Ecolab Vortexx**

Vortexx is a sanitizer used in hose stations and as a sanitizer for the plant. Storage is in 300 gallon tote with a concrete dike in the production area.

Table 3-1 Hazardous Substance Storage List

| **Container** | **Substance** | **Location** | **Total storage** | **Secondary containment** | **Means taken to prevent spill** |
| --- | --- | --- | --- | --- | --- |
| Tank | AC-3 | First Floor Mezzanine Dry Storage Hall | 1500 Gallons | Outer Tank | Daily Visual Observation/ Regularly Scheduled Inspections/Spill control kit |
| Tank | AC-101 | First Floor  Mezzanine Dry Storage Hall | 1500  Gallons | Outer Tank | Daily Visual Observation/ Regularly Scheduled Inspections/Spill control kit |
| Tank | Sani-Glide | First Floor Mezzanine Dry Storage Hall | 1500 Gallons | Outer Tank | Daily Visual Observation/ Regularly Scheduled Inspections/Spill control kit |
| Tank | Exelerate CIP  Plus | First Floor Mezzanine Dry Storage Hall | 1500 Gallons | Outer Tank | Daily Visual Observation/ Regularly Scheduled Inspections/Spill control kit |
| (24)  1-gallon containers | XY-12 | First Floor  Case Area | 1 gallon containers | Dike floor protection | Daily Visual Observation/ Regularly Scheduled Inspections/Spill control kit |
| Receiver Tank | Anhydrous Ammonia | Outside | 6000 Pounds Maximum | - | Daily Visual Observation/ Regularly Scheduled Inspections |
| 1 Tote and 1 double wall day tank | Vortexx | First Floor Case Area | 300 gallons | Dike floor protection | Daily Visual Observation/ Regularly Scheduled Inspections/Spill control kit |
|  |  |  |  |  |  |
| Three 55-gal drums | Enforce LP | First Floor Case Area & Tanker Bay | 165 gallons | Dike floor protection | Daily Visual Observation/ Regularly Scheduled Inspections/Spill control kit |
| One 55-gal  drum | Sterbac quat | First floor case area | 55 gallons | Dike floor protection | Daily Visual Observation/ Regularly Scheduled Inspections/Spill control kit |
| (1) | Carbo-Mizer | Outside Air Compressor Room | 550  Pounds | n/a | Daily Visual Observation/ Regularly Scheduled Inspections |

Figure 3-1 Location of Hazardous Materials at HP Hood.



# Inspection And Preventive Maintenance Procedures

This Chapter describes HP Hood’s inspection and preventive maintenance procedures for chemical storage tanks and fire protection equipment in accordance with 38 M.R.S.A. § 1318-C(1)(C); and 29 C.F.R. § 1910.120(q)(2)(iii).

## Facility Inspections

HP Hood conducts daily and monthly facility inspections to ensure the safety of their employees. During these inspections, chemical tanks and other containers are also examined. Specifically, the tanks are inspected for the following:

1. Drip marks;
2. Discoloration of tanks;
3. Evidence of leaked material;
4. Corrosion;
5. Damaged or worn bolts or gaskets;
6. Cracks;
7. Bowing of pipe between supports;
8. Signs of seepage of stored material on valves or seals; and
9. Leaking valves or pumps.

The areas of concern that are identified during the daily visual inspection are prioritized in the work order system and corrected as soon as possible.

All area Supervisors make ongoing observations. If an unsafe condition is identified, it is corrected immediately, if possible. In addition, area Supervisors conduct weekly area inspections. Each hazard identified is recorded on a safety inspection report, and submitted to the Plant Manager. Actions taken and priority of hazards are recorded.

Managers, Supervisors and line employees also conduct a monthly inspection of the facility. The results of the inspection are sent to the area Supervisors who are responsible for making corrections, if needed.

Each employee is responsible for the safe operation of machinery in his/her work area. At the beginning of each shift, employees are required to inspect the machinery that they are responsible for. Inspections will include:

1. Guards in place;
2. Emergency switches working;
3. Electrical wires, junction boxes, conduit, cords in good condition;
4. Work area clean and clear of hazards; and
5. Proper lighting.

All hazards are reported to a Supervisor immediately. Machinery that is not properly guarded or in good working order will not be operated.

## Preventive Maintenance Procedures

HP Hood routinely inspects and replaces process equipment as part of its preventive maintenance program. If an inspection shows that continuation of an operation or practice is likely to result in an imminent release, prompt action will be taken. Examples of imminent release indicators include, but are not limited to: leaking valves, pumps, and pipe joints; malfunctioning relief devices; and inadequate gauging.

If an inspection shows that an operation or practice is not an imminent threat to cause a release but is malfunctioning and could lead to a release if not remedied, appropriate repairs/action are completed within 90 days or as soon as practicable. Examples of probable release causes include, but are not limited to, signs of rust, corrosion, damaged dikes and external coating deficiencies.

HP Hood ensures that all piping systems are free of leakage, structurally sound, properly supported, compatible with the stored substances, and generally protected from failure. All piping associated with chemical bulk storage tanks are visually inspected for leaks, etc., by the designated department operator/Supervisor.

## Material Compatibility

HP Hood employees pay special attention to the compatibility of chemicals used at the plant. Chemicals are stored in containers that are made of compatible materials. Incompatible chemicals are not mixed with or stored in close proximity to one another. HP Hood employees refer to the manufacturer’s MSDS to determine the compatibility of chemicals with other materials. If a container shows evidence of incompatibility (e.g. changes color or bulges), the material will be transferred immediately to another container.

## Fire Prevention Program

The maintenance department and the safety committee is responsible for maintaining all fire extinguishers. Designated maintenance and safety committee employees inspect fire extinguishers once a month, documentation is recorded on the inspection tag for each individual unit (date and initials). The extinguishers are checked and serviced once a year by an outside contractor. Fire extinguishers are located throughout the building as shown by figures 6-1 through 6-4. If there is a fire, the Portland Fire Department is called immediately.

# DISCHARGE DETECTION, EMERGENCY WARNING, AND COMMUNICATION DEVICES

This Chapter describes discharge detection and emergency warning devices, the facility's emergency communication devices, and it meets the requirements of 38 M.R.S.A. § 1318-C(1)(G); and 37‑B M.R.S.A. § 795(1)(B).

## Hazardous Materials Release Alerting and Warning

In the event of a release of ammonia or another hazardous substance that poses a threat to health or safety, employees have been trained on the immediate dangers and evacuation procedures. All employees will evacuate once instructed to do so. No employees will re-enter the facility until confirmation has been obtained by the Incident Commander that it is safe to do so.

### Chemical Warning and Detection Devices

Since the plant is very small, leaks, spills, and discharges can be easily detected by visual observation or smell. In addition, the plant is equipped with three ammonia detectors, two in the cold storage area and one in the cellar. If the concentration of ammonia in the area exceeds a preset level, an alarm is sounded. Alarm levels are set as follows: 8ppm.

## Communications Systems

The primary means of emergency communication at the plant are cell phones, land line telephones, and the Public Address (PA) System. The PA system is capable of providing audible information to all areas of the plant.

### Cell Phones

All supervisors, Managers and Maintenance personnel have cell phones for use while at the facility.

### Telephones and Fax Machines

All areas of the facility have telephones and access to one of the two fax machines. Telephones are located in Shipping, Production, Warehouses, and Administrative Offices (see Figures 6-1 though 6-4). All telephones have the capability of dialing out.

**5.2.3** **PA System**

HP Hood has a PA system which can be used for paging employees as well as relaying information to all employees. All employees can access the PA System via the telephones located throughout the plant by dialing 1400. During an emergency, the PA system is used to warn employees and visitors of the situation, initiate evacuation, and to provide advice on the appropriate actions to take.

### Fire/Evacuation Alarm System

The facility’s fire alarm system and the maintenance and inspection programs associated with these alarms comply with the requirements found at 29 C.F.R. § 1910.165. The system consists of smoke detectors located throughout the building and a fire alarm on the third floor, which are wired at a central control panel. When a smoke detector or fire alarm is activated, flashing strobes and emergency sirens are deployed throughout the plant. If there is a fire, the employees and visitors are provided instruction to evacuate via the PA system.

# EMERGENCY RESPONSE AND PERSONAL PROTECTION EQUIPMENT

This Chapter identifies the facility's fire prevention equipment; hazardous material cleanup, decontamination and personal protection equipment (PPE); and describes the inspection and maintenance schedule for this equipment in accordance with 38 M.R.S.A. § 1318‑C(1)(D); 37-B M.R.S.A. § 795(D); 29 C.F.R. §§ 1910.120, Appendix A; and 29 C.F.R. § 1910.120(q)(2)(xi).

## Fire Prevention Equipment

A fire hydrant is located on Park Avenue, immediately outside the main building. There are approximately 30 fire extinguishers located throughout the facility. The extinguishers are inspected once a month by maintenance personnel and serviced annually by an outside contractor. Employees have been instructed not to fight fires and to contact Portland Fire Department in case of a fire, unless properly trained in the proper use and handling of fire extinguishers.

## Hazardous Material Response, Decontamination, And Personal Protection Equipment

All HP Hood employees who come in contact with any chemicals are provided safety masks, hard hats, safety glasses, and gloves. Employees are responsible for maintaining their own equipment. In addition, the facility has the resources listed in Table 6-1.

Table 6-1 HP hood Hazardous Materials Resource Inventory

|  |  |  |  |
| --- | --- | --- | --- |
| **Resource** | **Type** | **Quantity** | **Location** |
| APR | MSA | 2 | Entrance to cellar on boiler room side of building |
| Gloves | Chemical and Heat Resistant | Several | Laboratory, Cellar, Boiler Room, PPE Closet |
| Aprons | Chemical Resistant | 2 | Production |
| Face Shield | Chemical Resistant | 2 | Production, Maintenance |
| Goggles | Chemical Resistant | 5 | Laboratory, Production, Maintenance |
| Air Packs | S.C.B.A. | 2 | Boiler Room |
| Tyvek Suits | Disposable | 8 | Boiler Room |

HP Hood employees do not engage in hazardous material emergency response during emergency incidents, defined in Chapter 10. Certain HP Hood employees have been trained to respond to certain situations (“non-emergency incidents”, defined in Chapter 10).

## Medical Equipment

First Aid kits are located throughout the building (see Figures 6-1 through 6-4). The safety committee is responsible for keeping first aid kits stocked.

Two Automated External Defibrillator (AED) is on site as of October 2012. Both are in a marked cabinet the locations are

* Second Floor in between the restrooms
* Blow mold inside the door way leading out to the yard.

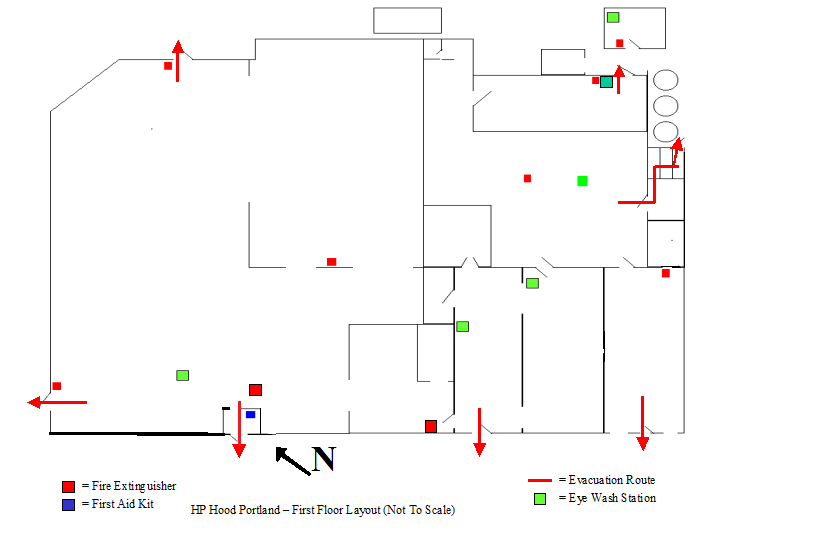
Training on AED’s, CPR, and Basic First Aid is conducted on site in conjunction with American Red Cross. Trained Responder’s thru 02/17/18 are as follows

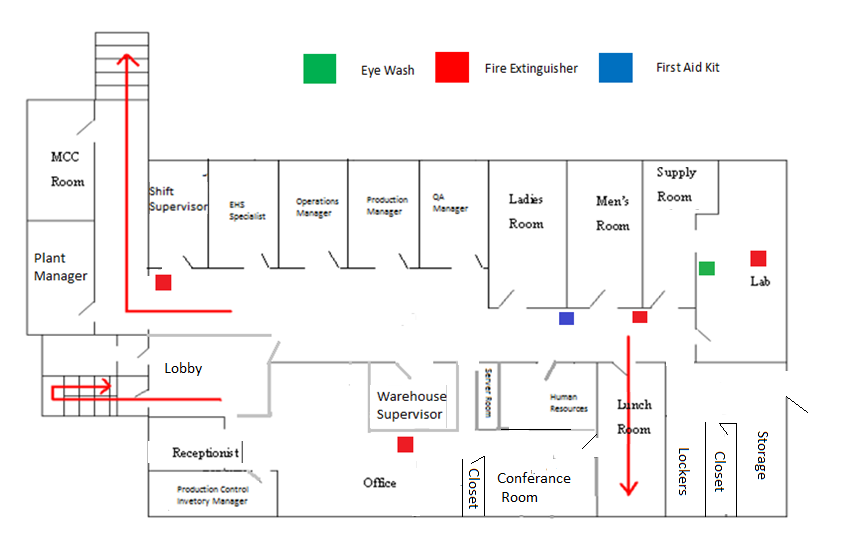
* Babcock, Roger
* Charlton, Chris
* Cleary, Dave
* Colwell, Chuck
* Fickett, Don
* Gove, Jillian
* Grant, Keith
* Hyde, Jason
* Libby, Clint
* Napolitano, James
* Ramsdell. Tammy

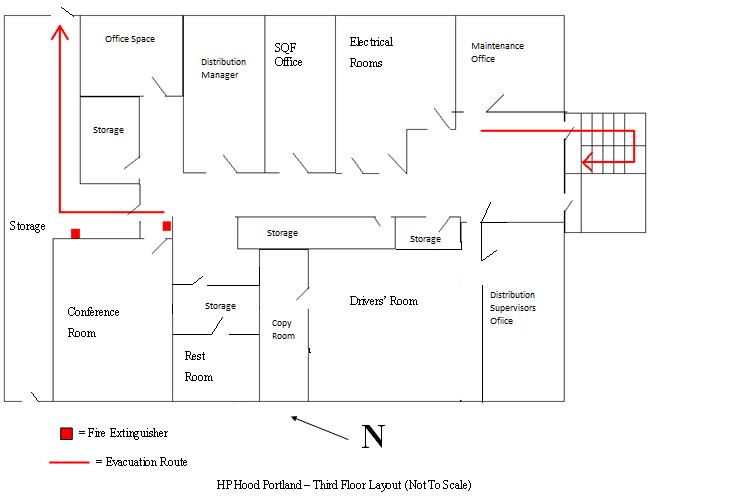
## Eye Wash Stations And Chemical Safety Showers

The facility has seven emergency eye wash stations: one in the CIP chemical area, one at the bulk chemical mezzanine, one in boiler room, one in production, one in the dry warehouse in the Carvel Building, one in the refrigerated warehouse, and one in laboratory. Three of the eyewash stations have combined showers with them. Figures 6-1 through 6-4 show the locations of eyewash stations and showers. The eye wash stations and showers are inspected monthly by HP Hood employees.

Figure 6-2 Location of Fire Extinguishers And Eye Wash Stations: First Floor.

Figure 6-3 Location of Fire Extinguishers And Eye Wash Stations: Second Floor.

Figure 6-4 Location of Fire Extinguishers And Eye Wash Stations: Third Floor.



# EMPLOYEE TRAINING PROGRAMS

HP Hood provides several different training programs to its employees. HP Hood’s training programs comply with 29 C.F.R. § 1910.120(q)(6) (emergency response); and 1910.1200(h) (hazard communication). HP Hood provides three types of employee safety training: New Employee Safety Orientation, Job Instruction Training, and Specialized Safety Training. HP Hood employees are, where appropriate, also trained on: safe work practices including standard operating and maintenance procedures; security procedures; appropriate use, inspection and maintenance of PPE; evacuation procedures; location of fire extinguishers; alarm systems; confined space entry; and lock-out tag-out procedures. All training records are kept in the Storage Closet for a period of at least three years. Table 7-1 lists the various kinds of training provided to the employees and the frequency of training.

Table 7-1. Employee Training

|  |  |  |
| --- | --- | --- |
| **Training** | **Employees Trained** | **Frequency of Training** |
| Hazard Communication | All Employees | One-time training for every employee, updated whenever a process or chemical use changes and the change presents new hazards. |
| Hazardous Material Technician | Two Maintenance Employees | Initial 24 hour training and annual refresher |
| Respiratory Protection | Maintenance Employees | Once a year |
| Confined Space Entry | Approx. 10 employees | Once a year |
| Lock-out/Tag-out | Maintenance (6 employees) | Once a year |

Note: All new employees required to perform any of the above functions will be adequately trained prior to operating in an unsupervised capacity.

## 7.1 Hazard Communication Training

All HP Hood employees who work with or may be exposed to hazardous chemicals (defined at 29 C.F.R. § 1910.1200(c)) at the facility are trained on the safe use and handling of the chemicals to which they may be exposed, the Federal Hazard Communication Standard (HCS) and this plan. The Plant Manager or his designee provide training to all new employees or whenever a new physical or health hazard is introduced into a work area. 29 C.F.R. § 1910.1200(h)(1). Hazard Communication Program training for new employees is included with Job Safety Training and Standard Operating Procedures. All other employees receive an annual refresher of the Hazard Communication Standard. Written tests are given after the training to judge the effectiveness of the instruction.

**7.1.1** **Training Materials**

Materials that may be used for hazard communication training include:

1. Commercially produced videotapes;
2. Material Safety Data Sheets for hazardous chemicals used at HP Hood;
3. Training session geared to familiarize employees with, and the location of, the hazardous chemicals in their work areas; and
4. Annual presentations given by chemical suppliers in the safe handling of chemicals.

### Scope of Training

HP Hood 's Hazard Communication training covers, but is not limited to, the following topics:

1. The requirements of, and employee rights under, the HCS;
2. The con­tent and physical location of the plant's written hazard communication plan (see Chapter 19);
3. The identity and location of hazardous chemicals in employees' departments;
4. Safe work practices developed by HP Hood for the handling of hazardous chemicals to which employees may be exposed;
5. How to detect the presence or release of hazardous chemicals, including appearance, odor, and use of monitoring devices, where appropriate;
6. The physical and health hazards of chemicals at the facility which employees may be exposed to;
7. How employees can protect themselves from hazards potentially caused by chemical exposure or use, including the use of protective equipment, proper work practices, and emergency response and accident prevention procedures;
8. How HP Hood implements its hazard communication program, including how to use, read and understand product warning labels and Material Safety Data Sheets;
9. Implementation of HP Hood 's ICP and evacuation procedures; and
10. Employee rights under the HCS, and how to obtain and use appropriate and/or additional hazard information.

## Emergency Response Training

Three plant employees are trained to the Hazardous Material Technician Level in accordance with 29 C.F.R. § 1910.120(q)(60(iii). Training includes initial 24-hour training and annual refresher courses. During non-emergencies and certain Level I emergencies described in Chapter 10, these employees are trained to don personal protective equipment, stop small releases and protect people and environment. Public outside emergency responders or the contracted hazardous materials response team (e.g., Clean Harbors) will respond to releases which may not be handled safely by HP Hood employees. Theses events include all level 2 and level 3 emergencies (see Chapter 10), and could include a level 1 emergency or fire.

The Hazardous Material Technicians have either received training or have sufficient experience to be competent in the following areas:

1. Know how to implement this ICP.
2. Know the classification, identification, and verification of known and unknown materials at the facility.
3. Be able to function within an assigned role in the employers incident command system.
4. Know how to select and use appropriate PPE.
5. Understand hazard and risk assessment techniques.
6. Be able to perform advance control, containment, and/or confinement operations within the capabilities of the resources and PPE available.
7. Understand and implement decontamination procedures.
8. Understand relevant standard operating procedures and incident termination procedures.
9. Understand basic chemical and toxicological terminology and behavior.

See 29 C.F.R. § 1910.120(q)(6)(iii).

## Respiratory Protection Training

The three Hazardous Material Technicians at the plant have received Respiratory Protection Training and get annual refreshers. The Respiratory Protection Training covers the following topics:

1. Proper use and limitation of respirators;
2. Reasons for respirator use;
3. Selection of respirators and cartridges;
4. Inspection of respirators;
5. Maintenance and storage;
6. Donning the respirator;
7. Fit testing (including handling of various respirators and a long period of wear in normal air);
8. Medical surveillance;
9. Air monitoring; and
10. Special situations - Confined space, heat, cold, lighting etc.

## Specialized Training

Specialized training is organized by the Portland Safety Specialist. Specialized training includes, but is not limited to:

1. Lockout/Tagout Training;
2. Confined Space Entry Training;
3. Hearing Conservation Training; and
4. Forklift Certification.

All Department Supervisors receive training in accident prevention, hazard recognition and control of accident causes, and safety inspections.

## Training Effectiveness

Supervisors present weekly "tool box" safety meetings to help reinforce fundamental safety practices. The safety committee reviews results of facility inspections and accident investigation findings, in part, to determine the effectiveness of training. Employees that work in an unsafe manner following training will be subject to disciplinary action up to and including termination.

**7.6 Exercising and Evaluating This Integrated Contingency Plan**

The facility performs an annual drill to test the effectiveness of this plan. The drill is performed in accordance with 37 B M.R.S.A. 795(1)(C).

### Evacuation Drill

The facility conducts an annual evacuation drill and documents the results using the questionnaire in Figure 7-1. Based on this questionnaire, this ICP may need to be revised. Revisions will be included and dated on the Revision Log by the Plant Manager or his designee and recorded at the front of this ICP on the Record of Changes. Evacuation drills may be based on any type of emergency other than a hazardous materials release (such as a fire drill).

### Hazardous Materials Release Scenario

As noted above, the facility is required by state law to test its Hazardous Materials Emergency Plan at least annually. 37-B M.R.S.A. § 795(1)(C). The annual test may be a table top exercise; a constructive discussion using the ICP to resolve problems; a functional exercise which adds time constraints and an evaluation of the coordination and information exchanged; or a full scale, realistic, facility-wide exercise intended to evaluate the operational capability of the plant's emergency management system. Departmental drills are conducted as necessary. Comments and suggestions as a result of these exercises may be implemented upon the opinion of management as well as feedback and recommendations by the Safety Committee. All comments contributing to revisions will be kept on file in the Plant Manager's Office.

Because HP Hood relies on municipal public safety services when possible, these exercises are coordinated with the affected municipalities and County or State Emergency Management Officials.

To clarify chemical safety for employees, please note that employees are trained during Hazard Communication training to safely handle the chemicals they work with. This ICP addresses the requirements of proper evacuation and limited emergency response responsibilities for emergency chemical releases.

Figure 7-1 Evacuation Drill Critique Questionnaire

Date of Report 6/29/01 Date of Exercise or 6/29/01

Actual Evacuation

What happened? There was a mock evacuation drill to test the effectiveness of muster point identification, egress capability and a building sweep to ensure a proper evacuation.

What outside service responded? No. I spoke with the Portland Fire Department and dispatch ahead of time informing them of our intentions and conducted the drill on our own.

Action taken: Set off alarm at 1:30 PM and all was judged clear at 1:40 PM.

What went well? Everyone exited in an orderly fashion, they knew the muster point. Supervisors did exceptionally well and were very fast to identify the completion of the head count of their respective departments.

What needs to be improved (and steps to improve)? Two people designated to make a building sweep was deemed highly effective, and documentation should be drawn up identifying that two people should be utilized in the event we need to evacuate the building.

Signature:

# AREAS IN NEED OF PROTECTION

The HP Hood facility is located in a commercial area and is not very close to any potentially sensitive environments. The closest water body to the facility is the Fore River, which is approximately a mile away. However, HP Hood uses hazardous and extremely hazardous substances, which can pose a potential danger to the businesses and residences in the area. In accordance with 38 M.R.S.A. § 1318‑C(1)(F), this Chapter identifies specific areas potentially in need of protection and the methods HP Hood employs to provide protection.

Measures taken by HP Hood, in part, to protect the areas identified below include: secondary containment of most bulk hazardous material tanks; regular visual inspections and preventive maintenance on tanks and secondary containment structures and systems; personal protective equipment; personnel training on proper operating procedures and safe hazardous material handling practices; emergency spill and release response procedures; pre-planning agreements with outside emergency responders (e.g., local fire and police departments, etc.); implementation of table top exercises; post-incident investigations designed to ensure that emergency incidents do not reoccur; and implementation of this ICP.

## Fore River

The facility is located approximately a mile away from the Fore River. A significant hazardous material release could potentially impact the river adversely. The protective measures described throughout this plan significantly decrease the possibility of a release from occurring and minimize the potential impact to the river from a hazardous material release at or from the facility.

## Residential Areas

The residential areas in the vicinity of the facility could be impacted by a major release. The protective measures described throughout this plan significantly decrease the possibility of nearby residential areas being impacted adversely by a hazardous material release at or from the facility.

## Small Businesses

Several businesses are located on St. John Street, St. James Street, and Park Avenue. These businesses could be adversely impacted by a significant hazardous material release at the facility. The protective measures described throughout this plan significantly decrease the possibility of nearby businesses being impacted adversely by a hazardous material release at or from the facility.

# Emergency Response Personnel, Roles And Lines Of Authority

This Chapter describes personnel roles, lines of authority, identifies emergency coordinators, and satisfies the requirements of 37-B M.R.S.A. § 795(1)(A); 38 M.R.S.A. § 1318-C(1)(H); and 29 C.F.R. § 1910.120(q)(2)(ii).

## Emergency Response Roles

In case of an emergency, the employee who becomes aware of the emergency will immediately call the Plant Manager at telephone extension 6710. The Plant Manager will assume the role of the Facility Emergency Coordinator (FEC), evaluate the situation and decide whether to activate this plan. The FEC will determine actions that may be necessary and, where applicable, will activate alarms or communications systems to notify all facility personnel of the danger. In the absence of the Plant Manager, his designee will assume the role of FEC.

## Chain-Of-Command

The Plant Manager is HP Hood's highest ranking emergency response official. The Plant Manager or his designee serve as the FEC during an emergency. When the FEC or his designee is on-site, he is responsible for the overall operation and safety of the facility and implementation of the employers Incident Command System or ICS.

The Incident Commander (IC) role is filled by the person in-charge of the outside agency which responds to the emergency at HP Hood. For example, in case of a fire emergency, the Supervisor of the Portland Fire Department response team will assume the role of IC and will be assisted by HP Hood employees, as appropriate. In the event of a hazardous material emergency, the Supervisor of the contracted outside response team will assume the role of IC.

## Emergency Response Job Responsibilities And Qualifications

This Chapter describes the job responsibilities and qualifications of the personnel that will respond to an emergency at HP Hood. Table 9-1 contains a listing of the key personnel to be contacted during an emergency.

### Facility Emergency Coordinator

The FEC has the authority to perform the following tasks upon notification of a chemical release emergency at the facility:

1. Identify the presence of a hazardous materials release;
2. Activate this ICP and evacuate employees, if necessary;
3. Call appropriate outside response agencies; and
4. Ensure that designated employees have completed head count at muster point(s) for all evacuated employees, visitors, and any contractors at the facility.

During certain chemical emergencies, the FEC and support personnel will form a Command Post and meet to coordinate response activities and resource requirements.

The FEC is responsible for coordinating the facility's response actions (e.g., ensuring all employees have evacuated safely, and the release area is barricaded until outside hazardous materials responders arrive at the scene.) If possible, the FEC will identify, from a safe distance, the substance of concern, quantity released, source of release, and the extent of the release. The FEC has the authority to call upon expertise as needed to assist the response efforts from a technical information perspective. This may include assessing the possible health and environmental hazards posed by the release of an irritating or asphyxiating gaseous chemical, such as ammonia. During Level 2 or 3 emergencies (defined in Chapter 10), no HP Hood employee may approach the point of release to plug, patch or otherwise control the release. Affirmative response to emergencies is the job of outside, professionally trained hazardous materials response teams.

The FEC is the primary liaison between the facility and outside public and private emergency responders. An Emergency Operations Center (EOC) may be established by outside responders. When an EOC is formed, the FEC will work with the outside responders and will coordinate resources and response efforts. The FEC is also responsible for making appropriate oral and written notifications of the incident to the State and Federal authorities. See Chapter 16.

### Incident Commander

The IC is in charge of directing emergency response operations at the facility. This role is usually assumed by the person in-charge of the external response team (e.g. Portland Fire Department, outside hazardous materials responder etc.). Depending on the situation (e.g., fire, hazardous material release, medical emergency) and which Response Team members have responded (e.g., Portland Fire Department, or private contractor), IC responsibilities may shift.

### Hazardous Material Technicians

HP Hood has trained three employees to the Hazardous Material Technician level. These employees may plug small releases during level 1 emergencies and non-emergency situations. HP Hood's Hazardous Material Technicians are part of the initial response to the site for the purpose of protecting nearby persons, property and the environment from the effects of the release.

## Personnel Roles

Everyone at HP Hood shares in the responsibility to create and maintain a safe environment and control losses within the organization. This responsibility starts with top management and permeates through all levels of management, supervision, and hourly employees. These responsibilities are outlined below.

### Executive Management

The Executive Management's responsibilities include giving full support and providing resources necessary to implement this ICP, delegating responsibility and authority for implementing this ICP to lower levels of management, authorizing the funds necessary to carry out the planning aspects of this ICP, and monitoring the performance of people responsible for implementing this ICP.

### 9.4.2 Plant Manager

The responsibilities of the Plant Manager include: assuming the role of FEC during an emergency, delegating responsibility to department heads and line Supervisors and holding them accountable for the implementation of this ICP, appointing a Facility Safety Coordinator, establishing a Facility Safety Committee and appointing a chairman, attending all safety committee meetings, and accompanying the Safety Coordinator on facility safety inspections.

### 9.4.3 Operations Manager

The General Manager assists the Plant Manager, as needed, during an emergency and acts as the FEC in the absence of the Plant Manager.

**9.4.4 EHS Manager**

The Safety Specialist is responsible for implementing and evaluating this ICP, providing assistance and making periodic inspections of the facility, discussing plant progress with local management, and making periodic reports to corporate management.

### Environmental Health & Safety (EHS) Director

The EHS Director’s responsibilities include working with the facility safety coordinator to ensure that Hood policies and procedures, as well as any state, local, and federal laws are adhered to. He periodically attends Facility Safety Committee meetings for the purpose of assisting the committee in achieving its objectives. He functions as the liaison between the Corporate Safety Committee and Facility Safety Committee to ensure that the Corporate Safety policies and procedures are being followed.

### Public Information Officer

Information about chemical releases will only be released to the media by the designated Public Information Officer (PIO). The release of information is according to corporate policy and pre-written procedures. New releases are coordinated with the municipal PIO.

On the advice of the FEC, the PIO chooses the most suited location for establishing a Media Operations Center (MOC) which is a briefing location for the news media. Possible locations for the MOC include the Fairfield Inn on Park Avenue and Denny's Restaurant on Congress Street. The actual location of the MOC will depend on the location and nature of chemical emergency at HP Hood. The initial communication with the news media may be by telephone and, if necessary, a public meeting with the media may be scheduled at the MOC. A list of local radio and television stations serving the area is provided in Table 9-2.

### Supervisors

Supervisors are responsible for enforcing facility and departmental rules, providing good leadership at all times and setting an example by using proper work procedures. They perform area inspections and submit written reports when conditions require correction. They instruct new employees in safe job methods, conduct safety discussions on a monthly basis with all employees, relay employee safety suggestions to management, periodically serve on the Safety Committee, ensure that safety equipment and protective devices are provided and used for each job, and follow-up on safety recommendations approved by the Safety Committee.

### Safety Committee

The responsibilities of the Safety Committee include: conducting monthly meetings, assisting in formulating and updating the safety rules and regulations, and reviewing past incident investigation findings and inspection recommendations and conducting following-up if they are not completed.

### Employees

Employees are responsible for working safely, using appropriate guards or PPE, and complying with all plant safety rules and regulations.

## Outside Assistance

The Plant Manager will determine whether an incident constitutes an emergency and requires the assistance of outside agencies. The Plant Manager or his designee is responsible for contacting the outside agencies for assistance. A list of phone numbers for outside resources are provided in Table 9-3.

Table 9-1 Facility Emergency Coordinators

**(Listed in order in which they will assume responsibility)**

|  |  |  |  |
| --- | --- | --- | --- |
| **Title** | **Name** | **Phone**  **Number** | **Home Phone**  **Number** |
| Plant Manager | John Marchildon | (207) 347-3739 | (603)625-1311  **(Cell Phone)** |
| Operations Manager | Keith Sturgis | (207) 347-3717 | (617) 448-2445  **(Cell Phone)** |
| Maintenance Manager | Richard Seiler | (207) 347-3734 | (207) 252-0771  **(Cell Phone)** |
| Production Manager | Jerry Witham | (207) 347-3723 | (207) 939-5715  **(Cell Phone)** |
| EHS Manager | Remi Fleuette | (603) 410-1056 | (603) 568-9436  **(Cell Phone)** |

Table 9-2 Emergency Information and Education

|  |  |  |
| --- | --- | --- |
| **Call Letters** | **Frequency/Channel** | **Phone Number** |
| **Radio Stations Serving the Area** |  |  |
| WHOM | FM 94.9 | (207) 773-0200 |
| WBLM | FM 102.9 | (207) 774-6364 |
| WMGX | FM 93 | (207) 774-4561 |
| **Television Stations Serving the Area** |  |  |
| WCSH | 6 | (207) 772-0181 |
| WGME | 13 | (207) 797-9330 |
| WMTW | 8 | (207) 775-1800 |
| FOX 51 UPN 35 | 12 | (207) 774-0051 |

Table 9-3 Outside Agency Emergency Phone List

**POLICE**

Portland City 911

Cumberland County Sheriff (207) 774-1444

Maine State Police (800)-482-0730

**FIRE**

Portland City 911

Non emergency (207) 874 8400

380 Congress St

**EMERGENCY MEDICAL/RESCUE**

MEDCU 911

**HOSPITALS**

Maine Medical Center Emergency Room (207) 871-2381

22 Bramhall St., Portland, ME

Occupation Health and Rehabilitation, Inc. (207) 774-7751

1600 Congress St., Portland, ME

Mercy Hospital Emergency Room (207) 879-3266

144 State St., Portland, ME

**HAZARDOUS MATERIAL RESPONSE CONTRACTORS**

National Response Corporation ENPRO (207) 878-3031

31 Waldron Way, Portland ME 04103

**ENVIRONMENTAL EMERGENCIES**

Maine DEP (24 Hour #) (800)-482-0777

Maine DEP - Portland (207) 822-6300

**OUTSIDE EMERGENCY NOTIFICATION**

City of Portland (207) 874-8300

Portland Water District (207) 774-5961

Public Works Department (207) 874-8871

Cumberland County (Emergency Management Agency) (207) 892-6785

Maine Emergency Management Agency (800)-452-8735

Department of Transportation (207) 289-2551

**MISCELLANEOUS RESOURCES**

National Response Center (800)-424-8802

Remis/Poison Control Center (800)-442-6305

(207) 871-4720

CHEMTREC - (24 Hour) Hotline (800)-424-9300

# Emergency Recognition And Characterization

HP Hood uses hazardous materials that are stored in compressed gas cylinders, bulk tanks, drums, and small containers throughout the facility (see Table 3-1). These materials, if released, have the potential to cause emergencies at the facility and, possibly, in surrounding areas. HP Hood's response to a fire, medical emergency, natural disaster, or a hazardous material release will depend on the facts, circumstances, potential hazards and substances involved in each incident. All incidents will be evaluated and characterized as soon as possible. This Chapter describes what constitutes "emergency" and "non-emergency incidents," how emergency incidents are classified, the measures HP Hood implements depending on the severity of an incident (e.g., Level I, II or III), and the steps HP Hood has implemented to prevent emergencies from occurring. This chapter also complies with some of the requirements of 29 C.F.R. § 1910.120(q)(2)(iii).

## Emergency and Non-Emergency Incidents

### Emergency Incident

An "emergency incident" is an occurrence which results, or is likely to result, in fire, injury, explosion or an uncontrolled release of hazardous material to air, water (including groundwater), or soil. It involves a response effort by outside emergency responders (e.g., local and state response agencies, fire departments, and private emergency response teams). 29 C.F.R. § 1910.120(a)(3). If an incident is characterized as a level 2 or 3 emergency incident, the HP Hood employees will (1) not attempt to control the situation defensively, (2) evacuate, and (3) must provide assistance to outside response agencies, as necessary.

### Non-emergency Incident

"Non-emergency incidents" are routine occurrences which can be handled safely by trained operational employees in the immediate work area or trained maintenance personnel from other areas of the facility. For example, non-emergency incidents could include, without limitation:

1. Repairs of a leaking pipe, container or tank (if the leak can be controlled by operational personnel without outside emergency assistance and it is not likely to adversely affect or threaten to affect human health or the environment); or
2. Incidental hazardous material releases or spills which can be absorbed, neutralized, or otherwise controlled at the time of release by operational employees in the immediate area (e.g., if a small amount of oil or solvent spills, and an employee in the area can safely clean it by using absorbents).

During a “non-emergency incident”, responding employees must comply with OSHA Workplace Protection Standards (e.g., wear appropriate PPE, follow evacuation routes, and not return to the area to collect valuables). If an incident occurs and it cannot conclusively be characterized as a “non-emergency,” it is characterized as an emergency and emergency response procedures are implemented (e.g., the Plant Manager or his designee is notified, this ICP is implemented). If subsequent evaluation of the situation by the Plant Manager shows that an emergency does not exist, the incident will be re-characterized accordingly.

## Definitions of Emergency Incident Levels

The incident level of an “emergency” is determined by what has already happened, what is currently happening, and what could happen. Typically, an incident that is in its early stages, but has progressed past the “non-emergency” stage, is easier to control and has less adverse impacts then prolonged, uncontrolled incidents. Certain HP Hood employees are authorized to respond to Level 1 emergencies. However, no Hood employees are allowed to respond to Level 2 and 3 emergencies - Hood will rely on outside contractors or agencies take offensive steps to handle these types of more serious emergency situations. Emergency incidents will be characterized, by level of severity, as described below.

### Level 1

A Level I incident is the least serious and most easily handled emergency. It usually requires an initial isolation and evacuation of the immediate and surrounding area as a precautionary measure. The Plant Manager, with the assistance of other Supervisors, will quickly determine if they can safely and effectively mitigate the incident as a non-emergency. Certain trained Hood employees are capable of addressing small ammonia releases by donning appropriate PPE and applying ammonia spill packs to stop small releases. These leaks will always involve less than **25 ppm** of ammonia. If the Plant Manager determines that the release cannot be safely mitigated in-house and support from an outside contractor or agency, it will then be characterized as a Level 2 emergency.

### Level 2

A Level 2 incident could potentially pose some threat to life, environment, or property and impact the facility operations. Evacuation of the immediate and adjacent areas may be necessary. There may also be a need for special expertise and equipment, and industrial hygiene or environmental sampling may be necessary. The Supervisor of the outside emergency responder will assume the responsibility of IC and follow all standard operating guidelines for an emergency response. All required environmental notifications will be made by the Plant Manager, or designee, and documented for facility records.

### Level 3

A Level 3 incident is any incident that:

1. Requires widespread evacuation of the facility and/or the community,
2. Involves multiple casualties and/or exposure, or
3. Potentially poses a serious threat to human health, the environment and/or property

Level 3 incidents generally require assistance from outside emergency response agencies, additional resources, and large numbers of emergency responders. As with Level 1 and 2 emergencies, standard operating guidelines will be followed for an emergency response. All required environmental notifications will be made by the Plant Manager, or designee, and documented for facility records.

## Characterizing Emergency Incident Levels

During any emergency incident, it is the responsibility of the Plant Manager to immediately determine the incident level after conferring with the department Supervisors. The initial determination directs initial response actions.

Initial determinations can be revised when re-characterization is warranted. However, the quicker an incident is characterized correctly, the quicker the situation can be brought under control. Past experiences with similar types of incidents may be useful in determining the correct emergency level.

The following factors are considered when evaluating and classifying an emergency incident level:

1. The type of incident (fire, explosion, release)
2. Location of the incident
3. The hazardous material involved and the hazards potentially associated with the material
4. Size, duration, and characteristics of the incident, when available
5. Potential hazards to facility personnel, public, and the environment
6. Corrective actions needed to control the incident and potential consequences of those actions
7. Potential for involvement of other facility areas and the possibility of secondary incidents
8. Any mitigating or aggravating factors (e.g., weather conditions, proximity of incompatible material, loss of power).

# Internal Notification Procedures

This Chapter describes notification procedures for plant employees, contract workers and facility visitors, of potential emergencies. It is designed to comply with the communication requirements under 29 C.F.R. § 1910.120(q)(2)(ii) and (ix) and 37‑B M.R.S.A. § 795(1)(E).

When an employee detects a situation that could result in an emergency incident, that employee will immediately notify the Plant Manager, who serves as the FEC, at Telephone Extension 3739 or the appropriate alternate (see Table 9-1). The back-up means of communication is the PA system. Upon being informed of a potential emergency, the FEC will evaluate the situation and implement this ICP, if necessary. Depending on the nature of the emergency, the FEC may decide to initiate evacuation of the facility. The employees will be notified of the emergency via alarms, which are sounded during fires and ammonia releases, or by the PA system (described in Chapter 5). Depending on the situation, it may only be necessary to evacuate a portion of the facility and some facility personnel may remain on site. This determination will be made by the FEC and will depend on the situation. All threatened areas will be evacuated.

If an evacuation is warranted, the plant PA system will be used as the primary means of informing people at the facility to evacuate. In addition, the PA system will be used to provide specific evacuation information as needed. The notification will include the reason for the evacuation, the proper routes to take and other necessary information. Primary and alternate “rally” or “muster” points have been established as described in Chapter 13.

## Sample Emergency Message

A sample emergency message is given below:

"At (time), emergency personnel within HP Hood were notified that there was a (chemical name) release from the (location in plant).

All efforts are being made to control the release and minimize the affect on the nearby citizenry and environment. Local, State, and Federal Officials have been notified and precautionary actions are being taken.

Once normal operations are resumed, further details will be provided."

# EMERGENCY RESPONSE

This Chapter describes HP Hood's emergency response procedures to releases of hazardous and non-hazardous materials, in compliance with 38 M.R.S.A. § 1318-C (1)(L); and 29 C.F.R. § 1910.120(q)(3).

## General Spill Response Procedures

The following procedure will be followed in case of a chemical spill:

1. Upon discovery, inform Plant Manager or acting FEC of the situation;
2. FEC will assess the situation and order evacuation, if necessary;
3. Request assistance from outside emergency responders, if necessary;
4. Restrict access to impacted and threatened areas;
5. Keep unprotected personnel upwind of spill area;
6. Avoid contact with spilled product;
7. Eliminate ignition sources that may be present;
8. Prevent product from entering sewers and confined spaces;
9. Consider potential mixing of incompatible materials;
10. Use explosion-proof and spark-proof equipment where necessary; and
11. Determine if a reportable incident occurred and facilitate reporting as required by law.

## Hazardous Substance Spill Response

### All Employees

Immediately upon discovering that a release or a spill has occurred or has the potential to occur, employees have been trained to inform any Supervisor or dial extension 3725 and advise the Plant Manager of the situation. If a Supervisor or the Plant Manager cannot be reached by phone, the employee will relay the information on the PA System. The employee reporting the incident should provide as much information as possible regarding the type, nature and location of the spill. Employees are trained to control small and incidental spills and leaks which result in “non-emergencies.” The employees will protect life and minimize losses by evacuating and preventing entry into potentially dangerous areas.

Tables 12-1 through 12-4 give the characteristics and handling protocol for the hazardous chemicals (ammonia, sodium hypochlorite, phosphoric acid and sodium hydroxide) used at HP Hood. Employees are expected to follow the protocol and use appropriate PPE when working with these chemicals. These tables also provide information on the appropriate course of action to take in case of exposure to one of these chemicals.

Table 12-1 Ammonia: Characteristics And Protocols

|  |  |
| --- | --- |
| **General Health Hazards** | Irritating to mucous membranes and lung tissue. Prolonged exposure to concentrations greater than 500 ppm immediately dangerous to life or health. May cause permanent injury or death. Corrosive to skin, may lead to frostbite, redness, pain and serious skin burns. Corrosive to eyes, causing pain, redness, ulceration of conjunctive and cornea and lens and opacities. Ingestion - burns, nausea, vomiting and severe irritation. |
| **Protection (Equipment and Personnel)** | Protection approved by NIOSH/MSHA for ammonia must be used when exposure limits are exceeded. Appropriate protection depends on type and magnitude of exposure. Rubber gloves and rubber or PVC/Nylon/PVC laminate protective clothing should be used to prevent skin contact. A face shield should be used to prevent contact with splashed liquids. Chemical splash goggles should be used. |
| **Contamination Symptoms** | Inhalation - Sore throat, coughing, shortness of breath  Skin and Eye Contact - redness, pain, burns  Ingestion - nausea, vomiting |
| **Decontamination Procedures** | Inhalation - Remove from exposure, administer artificial respiration or oxygen as needed.  Skin contact - Immediately flush clothing with large quantities of water for 15 minutes. In case of frostbite do not remove clothing. Rinse with water and seek medical attention.  Eye contact - Flush immediately with large amounts of water for at least 15 minutes. Get immediate medical attention.  Ingestion - Do not induce vomiting. Give 1-2 glasses of milk and water. Immediately seek medical attention |
| **Spill Criteria** | RQ= 100# Small spill/release definition=Dike spill and use water spray to absorb ammonia gas. |
| **Special Precaution** | With a source of ignition present, ammonia will burn in the range of 16 to 25% air. Water fog or spray should be used to extinguish the flames. Ammonia reacts with chlorine, bromine, mercury, silver, silver solder, and hypochlorite to form explosive compounds. |

### Table 12-2 Sodium Hydroxide: Characteristics And Protocols

|  |  |
| --- | --- |
| **General Health Hazards** | Severe irritant. Effects from inhalation of dust or mist vary from mild irritation to serious damage of the upper respiratory tract, depending on severity of exposure. Severe pneumonitis may occur. Swallowing may cause severe burns of mouth, throat, and stomach. Severe scarring of tissue and death may result. Symptoms may include bleeding, vomiting, diarrhea, and fall in blood pressure. Damage may appear days after exposure. |
| **Protection (Equipment and Personnel)** | Wear impervious protective clothing, including boots, gloves, lab coat, apron or coveralls, as appropriate, to prevent skin contact. Use chemical safety goggles and/or a full face shield where splashing is possible. Maintain eye wash fountain and quick-drench facilities in work area. |
| **Contamination Symptoms** | Inhalation - Symptoms may include sneezing, sore throat or runny nose. Severe pneumonitis may occur.  Skin and Eye Contact - Corrosive! Contact with skin can cause irritation or severe burns and scarring with greater exposures.  Ingestion - Corrosive! Swallowing may cause severe burns of mouth, throat, and stomach. |
| **Decontamination Procedures** | Inhalation – Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Call a physician.  Skin contact – Immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Call a physician, immediately. Wash clothing before reuse.  Eye contact – Immediately flush eyes with plenty of water for at least 15 minutes, lifting lower and upper eyelids occasionally. Get medical attention immediately.  Ingestion - Do not induce vomiting. Give 1-2 glasses of milk and water. Immediately seek medical attention |
| **Spill Criteria** | RQ= 1000# Small spill/release definition=Dike spill |
| **Special Precaution** | Keep in a tightly closed container. Protect from physical damage. Store in a cool, dry, ventilated area away from sources of heat, moisture and incompatibilities. Always add the caustic to water while stirring; never the reverse. Containers of this material may be hazardous when empty since they retain product residues (dust, solids); observe all warnings and precautions listed for the product. |

Table 12-3 Sodium Hypochlorite: Characteristics And Protocols

|  |  |
| --- | --- |
| **General Health Hazards** | May cause irritation to the respiratory tract, (nose and throat); symptoms may include coughing and sore throat. May cause nausea, vomiting. May irritate skin. Contact may cause severe irritation and damage, especially at higher concentration. A constant irritant to the eyes and throat. Low potential for sensitization after exaggerated exposure to damaged skin. |
| **Protection (Equipment and Personnel)** | Wear impervious protective clothing, including boots, gloves, lab coat, apron or coveralls, as appropriate, to prevent skin contact. Use chemical safety goggles and/or a full face shield where splashing is possible. Maintain eye wash fountain and quick-drench facilities in work area. |
| **Contamination Symptoms** | Inhalation – May cause irritation to the respiratory tract, (nose and throat); symptoms may include coughing and sore throat.  Skin and Eye Contact - May irritate skin. Contact may cause severe irritation and damage, especially at higher concentration.  Ingestion - May cause nausea, vomiting. |
| **Decontamination Procedures** | Inhalation –Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention immediately.  Skin contact – Immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Get medical attention immediately.  Eye contact – - Immediately flush eyes with plenty of water for at least 15 minutes, lifting lower and upper eyelids occasionally. Get medical attention immediately.  Ingestion - Do not induce vomiting. Give 1-2 glasses of milk and water. Immediately seek medical attention |
| **Spill Criteria** | RQ= 100# Small spill/release definition=Contain and recover liquid when possible. Collect liquid in an appropriate container or absorb with an inert material (e. g., vermiculite, dry sand, earth), and place in a chemical waste container. |
| **Special Precaution** | Keep in a tightly closed container, stored in a cool, dry, ventilated area. Protect against physical damage. Isolate from incompatible substances. Containers of this material may be hazardous when empty since they retain product residues (vapors, liquid); observe all warnings and precautions listed for the product. |

Table 12-3 Phosphoric Acid: Characteristics And Protocols

|  |  |
| --- | --- |
| **General Health Hazards** | Harmful or fatal if swallowed. Causes burns to eyes, skin and mucous membranes. Mists or sprays will irritate and may damage upper respiratory tract and lungs. Eye contact may cause permanent blindness. |
| **Protection (Equipment and Personnel)** | Eye Protection - Chemical splash goggles  Skin Protection - Rubber gloves, protective clothing  Respiratory Protection - Not normally required |
| **Contamination Symptoms** | Burns to skin or eyes |
| **Decontamination Procedures** | Ingestion - If person can swallow, give one glass of water or milk. Do not induce vomiting. Get immediate medical attention  Skin contact - Wash affected areas with soap and water  Eye contact - Flush immediately with large amounts of water for at least 15 minutes. Get immediate medical attention.  Inhalation - Remove from exposure, administer artificial respiration or oxygen as needed. |
| **Special Precautions** | Fire - Persons exposed to thermal decomposition products should wear full protective equipment including self-contained breathing apparatus |
| **Spill Criteria** | RQ= 100# Small spill/release definition=Contain and recover liquid when possible. Collect liquid in an appropriate container or absorb with an inert material (e. g., vermiculite, dry sand, earth), and place in a chemical waste container. |
| **Special Precaution** | Keep in a tightly closed container, stored in a cool, dry, ventilated area. Protect against physical damage. Isolate from incompatible substances. Containers of this material may be hazardous when empty since they retain product residues (vapors, liquid); observe all warnings and precautions listed for the product. |

### Emergency Coordinator

The Plant Manager will assume the responsibilities of FEC and will immediately assess reported situations. The assessment will evaluate:

1. Nature and scope of problem
2. Steps necessary to protect life, health, environment, and facility operations
3. Whether outside emergency responders are needed

The FEC will immediately determine the need for and extent of evacuation (if not already accomplished) by consulting with other Supervisors and/or resources listed in Chapter 9 of this ICP. Once he activates this ICP, he will call the appropriate outside emergency responders to help mitigate the situation. The FEC and his support team will serve as liaisons between the facility and local, state and federal emergency responders.

### Outside Contractors

We will use is National Response Corporation (ENPRO) located on Waldron Road, Portland Maine. (See page 37 for phone #) for ammonia leaks and all other hazardous material response). They will operate under their own emergency response plan and use their own personal protective equipment when called to provide emergency assistance at HP Hood. The response team will also provide their own decontamination equipment and procedures.

### Medical

HP Hood does not employ professional medical staff on site. Employees will be treated at the Occupational Health & Rehabilitation Center or Maine Medical Center in case of a work-related incident. Employees assisting other injured employees at work should take the following precautions to protect themselves and others against blood borne pathogens:

1. Wear appropriate personal protection equipment, such as face and/or eye protection and gloves.
2. If trained in the correct procedures, use absorbent barriers to soak up blood or other infectious materials.
3. Clean the spill area with an approved disinfecting solution.
4. Dispose of contaminated materials in an approved waste disposal container.
5. Discard contaminated PPE in an appropriately labeled container.

Employees exposed to blood or body fluids while assisting another worker should do the following:

1. Use soap and water to wash the body parts that have been contaminated.
2. Report the incident to their Supervisor. Early action can prevent the development of hepatitis B and enable affected workers to track potential HIV infection.
3. Complete an incident report with details of the accident.

### Containment

HP Hood employees will respond offensively to chemical releases that are non-emergencies or Level 1 emergencies and defensively in case of Level 2 and 3 emergencies. Under no circumstances will they attempt to control or contain the release in an “emergency incident”. Containment will be done by the Portland Fire Department and/or an outside contractor such as Clean Harbors.

### Hazardous Substance Reportable Quantities

If a material released to the ground, water or air and contains hazardous substances, the Plant Manager will determine if the release exceeds an RQ listed in Table 2-1. If the release exceeds an RQ, then telephone and follow-up written reports will be made immediately as described in Chapter 16 of this Plan.

### Clean-Up

The FEC will facilitate proper clean-up after the spill has been contained by outside contractors and all threats to human life or the environment have been eliminated. The FEC will ensure all clean-up and disposal activities are protective of human health, safety, and the environment, and comply with all applicable environmental laws.

### Decontamination

The outside contractor called on to respond to an emergency will be responsible for decontamination of the incident area. Decontamination waste, such as gloves, protective clothing and absorbent material will be classified as either non-hazardous or hazardous waste, and will be stored and disposed of in accordance with applicable federal, state, and local laws.

### Notifications

The Plant Manager or designee is responsible for reporting reportable incidents to the appropriate regulatory and corporate parties. HP Hood’s reporting procedures are described in detail in Chapter 16.

### Investigation and Critique

HP Hood will conduct an investigation into the cause of the spill, the emergency response, and the corrective action needed to prevent a repeat incident as described in Chapter 17. If this ICP fails for any reason, it will be amended.

## Non-Hazardous Material Spill Response

Immediately upon recognizing that a spill of non-hazardous material has occurred (i.e. motor oil), or has the potential to occur, the Plant Manager will be called at extension 3725. The caller should describe the location, nature and type of material involved in the spill. The Plant Manager will consider the following:

1. Sizing-up the situation;
2. Threat to human health and safety;
3. Containment;
4. Clean-up;
5. Notifications; and
6. Investigation and critique.

## Fire Emergency

When the fire alarm is activated, the FEC or nearest Supervisor will investigate the fire and call the Portland Fire Department for assistance. The Plant Manager, FEC or nearest supervisor will determine if the fire poses danger to all or part of the plant and if a portion of the or the entire facility should be evacuated.

The Fire Chief or his designee will assume the role of IC on arriving, and take charge of mitigating the emergency. If the plant has not been evacuated, the Plant Manager will meet the fire department in the parking lot. If the plant has been evacuated, the FEC will meet the fire department at the off-site muster point/command post and apprise them of the situation.

# Evacuation Routes, Safe Distances, And Places Of Refuge

This Chapter identifies primary and alternate internal evacuation routes, emergency shut-down procedures, evacuation muster points, headcount procedures, safe distances, places of refuge, and shelter-in-place procedures. It also identifies the steps the plant takes if areas outside the plant boundary could be impacted by an emergency event at the plant. The purpose of this Chapter is to ensure orderly and coordinated evacuation of the facility and to coordinate with local authorities, where necessary, for the evacuation of the citizens in close proximity to the facility. This Chapter complies with the requirements of 29 C.F.R. § 1910.120(q)(2)(iv) and (vi); and 38 M.R.S.A. § 1318-C(1)(I).

## Potential Causes For Evacuation

The plant uses certain chemicals that, if released or spilled in large quantities, might pose a threat to the lives and safety of people and require partial or total evacuation of the plant. In addition, other events may also require partial or total plant evacuation. These substances and/or events include, without limitation: (1) a large release of a hazardous chemical; (2) a fire; (3) severe weather; or (4) a bomb threat or terrorist attack.

## Evacuation Decision And Notice

All employees are trained to inform a Supervisor upon discovering a spill or release of any chemical, fire, or learning of any situation that may constitute an emergency. Upon notification of such a situation, the Plant Manager will assume the role of Facility Emergency Coordinator (FEC). If the Plant Manager is not present, an alternate FEC will take charge. The FEC will immediately assess the situation and determine whether evacuation is necessary. The Supervisor at the scene of the incident can also authorize evacuation if there is an immediate, life threatening situation. If an emergency incident requires all or part of the plant to be evacuated, the procedures described below will be followed.

## Emergency Evacuation Procedures

The first step to effective evacuation is alerting and warning the employees. The procedures for notifying employees at the facility are described in Chapter 11. Employees ordered to evacuate an area should leave by the nearest safe exit in an orderly fashion. Operating machinery should be secured according to existing standard operating procedures (SOP), if it can be done without risk. Muster points are assigned for employees evacuating the facility and are provided in Section 13.5.

Evacuation routes are posted throughout the facility. These evacuation routes have been designed to ensure a safe and orderly evacuation of employees, visitors and contractors from all plant areas. While specifically designed for use during fires and chemical spills or releases, these routes may also be implemented during other types of emergencies. Because every emergency is unique, the appropriateness of pre-designated evacuation route will depend in part on the circumstances posed by the emergency (e.g., type of event, incident level, weather conditions, location, etc.) and the decisions made by the trained emergency responders. If smoke, heat, chemical exposure, or any other circumstance make execution of the duties specified below unsafe, they should not be attempted. Rather, employees should wait for instructions from the FEC or trained Emergency Response Personnel. These instructions and the notification of evacuation will be made via the PA system.

### Internal Evacuation

Upon activation of an evacuation by the FEC, all employees will be instructed over the PA system to evacuate through the nearest marked emergency exit, unless that exit is inappropriate due to the emergency. When the primary emergency exit is inaccessible, the nearest alternate exit will be used. Emergency escape routes are posted throughout the facility (see Figure 13-1) and described in Table 13-1 below*.* All employees will report to the pre-designated muster points (see Section 13.5).

Table 13-1 Primary and Alternate Evacuation Routes

|  |  |  |  |
| --- | --- | --- | --- |
| **Floor** | **Area** | **Primary Evacuation Route** | **Alternate Evacuation Route** |
| Cellar | Cellar | Use Stairs to Front Door | Use Back Stairs to exit across from the Boiler Building |
| First Floor | Chest | Use nearest door - walk through Overhead doors to outside | Use an alternate overhead door |
|  | Receiving | Use nearest exit in Receiving Bay | Use Front Door |
|  | Pasteurizer | Use Front door | Exit through Receiving Bay doors |
|  | Filling Operators | Use Cellar Exit | Use Boiler or Case Dock Exits |
|  | Case Dock | Use nearest exit on Case Dock | Use Front Door |
| Second Floor | Front Offices | Use Front Stairway to Ground Floor Lobby to Front Door | Use Back Stairway, to Receiving, to outside |
|  | Lab, Lunch Room, Back Offices and Rest Rooms | Use Stairs to Front Door | Use the Lunch Room Emergency Exit Door, onto roof, to Fire Escape. |
| Third Floor | Conference Room, Back Offices | Use Stairs to Front Door on the Ground Floor | Use Fire Door to Roof to Fire Escape to the ground |
|  | Front Offices | Use Stairs to Front Door on the Ground Floor | Use stairs to second floor Lunch Room Emergency Exit Door, onto roof, to Fire Escape |

### Roles and Responsibilities

*This policy is written for off-shift events when the leadership at this facility consists of a warehouse supervisor and production supervisor. These supervisors may utilize employees to help them “clear” the building. The decision to call 9-1-1 will be made by the FEC based on observations made.*

Warehouse Supervisor- Shall walk through the warehouse, reprocessing room, D-bag room, case-room, Fed 2 filler, FOGG filler confirming all employees in these areas have evacuated the building. Having completed the sweep the supervisor will pick up the muster point kit located in the shipping office and proceed to the muster point. Arriving at the muster point the supervisor will direct employees to gather by department in preparation for the head count. The supervisor must account for the location of the on-duty yard-jockeys and brief them on the emergency. Select three (3) employees to assist with pedestrian and traffic control into the facility. Post the selected employees at (1) the front entrance on Park Ave., (2) The Shipping department entrance, (3) Parking lot entrance. The two (2) employees posted at pedestrian entrances will be instructed to control access to these areas so that individuals do not re-enter the facility. The one (1) employee posted at the parking lot entrance will be instructed to control vehicle access into the parking lot. The supervisor will equip these three (3) employees with a reflective vest, a flashlight, and a radio to communicate. The supervisor will now call Management: Keith Sturgis, Jerry Witham, Richard Seiler, and John Marchildon to report the emergency. Phone numbers are loaded into business cell phones and listed on page 78 of this document. The supervisor will await the arrival of the production supervisor to review the current status and coordinate the head count.

Production Supervisor- Shall walk through the filling room, processing room, past & raw silo alleys, maintenance shop & utility room, air compressor room, boiler room, raw receiving, second floor office spaces, restrooms, Lab, third floor offices, restroom, conference room, parts room. Having completed the sweep the supervisor will pick up the visitor log located at the receptionist window, and the first responder go-bag located in the main office and proceed to the muster point. Arriving at the muster point the supervisor will link up with the warehouse supervisor to review the current status and coordinate the head count.

Employees- Upon realizing the need to evacuate, employees are asked to turn off the equipment at their work station provided they are not in immediate danger. Then exit the facility by using the nearest safe exit and proceed to the muster point. Reminder do not go to your locker or car. At the muster area report in to your supervisor and then form with your department group. The use of cell phones and social media are prohibited in the muster area.

### Post Evacuation Assessment; Accounting for all Personnel

The Supervisors of each department are responsible for taking post evacuation head counts and making sure all HP Hood employees and visitors/contractors are accounted for. After arriving at the designated muster point, each employee is responsible to report to his/her Supervisor so that the Supervisors can be assured that all employees have safely exited the facility. This is accomplished by employees from each department forming in separate groups. The Supervisors will report their headcount results immediately to the FEC.

Should an employee be unaccounted for, the FEC will communicate this information to the emergency response team entering the unsafe space to immediately retrieve any missing personnel. It is the responsibility of the Supervisors to keep track of contractors and visitors entering the plant and inform them of evacuation and mustering procedures. During an emergency, the Supervisor notifies the FEC about the evacuation status of contractors and visitors under their supervision.

In order to manage and control an evacuation, the FEC or his designee will be positioned at the southeast corner of the facility on the sidewalk (near the Country Department). All Supervisors or lead persons will report to this location after they have completed their evacuation duties. The FEC will assign employees to secure the front entrance, maintenance entrance, and the shipping entrance to be assured that no one will enter the building.

### Community Evacuation

The IC may inform the Chief Elected Official and/or other appropriate municipal officers to consider evacuation or sheltering of the public if an event at the facility could adversely impact off-site areas. Prior to informing an elected official, the IC will consider:

1. Evidence that a significant release of hazardous materials could pose a threat beyond the plant boundary;
2. Fire involves areas containing hazardous chemicals which could pose a threat beyond the plant boundary; and
3. Potential for explosion which could pose a threat beyond the plant boundary.

The technical support staff at the plant will assist the municipal officials with any information they need to make off-site evacuation decisions.

It is the responsibility of the Portland Fire Department, working in conjunction with other city and county entities, to decide whether community evacuation is appropriate. If a community evacuation is ordered, the Portland Fire Department will initiate and complete the evacuation in accordance with the Cumberland County Emergency Management Plan.

In the event of a Level II or III emergency incident at the facility, various municipal agencies may be involved in the response. As discussed in Chapter 18, arrangements have been made with various public and private emergency response entities to coordinate effective emergency response at the plant.

### Re-Entry for HP Hood Employees

No employee shall attempt to enter the building after an evacuation until the Incident Commander (external contractor) of the hazardous materials response team or Portland Fire Chief in conjunction with the FEC has determined if it is safe to do so. The outside emergency responder is responsible for making this decision based on air monitoring and/or visual assessment. Upon clearance of the area, employees are allowed to re-enter. Local emergency officials are responsible for informing the community when they may return to evacuated areas. The FEC and his support team will assist the local emergency officials with information they may need to make that determination.

## Sheltering Procedures

Sheltering may take one of two forms during a chemical emergency: in-place sheltering within the threatened area or sheltering following evacuation out of the threatened area.

### Sheltering In Place Within The Facility

This strategy is used when it is recognized by the Facility Emergency Coordinator that employees cannot be safely evacuated from an area prior to the arrival of toxic cloud. The FEC will instruct the employees through previously described notification procedures to take shelter where they are located. Employees who take shelter in-place should observe the following procedures:

1. Close all doors and windows
2. Secure openings under doorways
3. Disconnect air conditioners and fans
4. Lower the thermostat setting of any heater to minimize the intake of external air

Airborne toxins vary in their weight relative to air. The FEC and his technical staff is contacted to determine whether the particular chemical is heavier or lighter than air. Persons in the building are directed to where it is most advantageous to take shelter within the building. The FEC authorizes the notification of the people sheltered within the facility as to when the cloud has cleared the air and it is safe to exit.

### Sheltering Following Evacuation

In the event of adverse weather conditions during evacuation, shelters are designated at or near the employee assembly points. Employees evacuated off the facility boundaries are instructed to meet at a designated off-site assembly point. The nearest available shelter to be used by employees evacuated off-site is Denny's Restaurant.

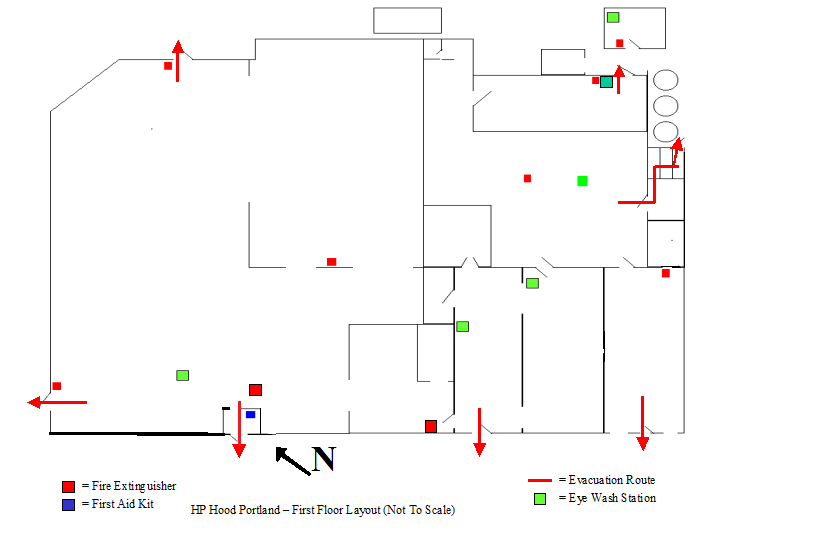
## Muster Points

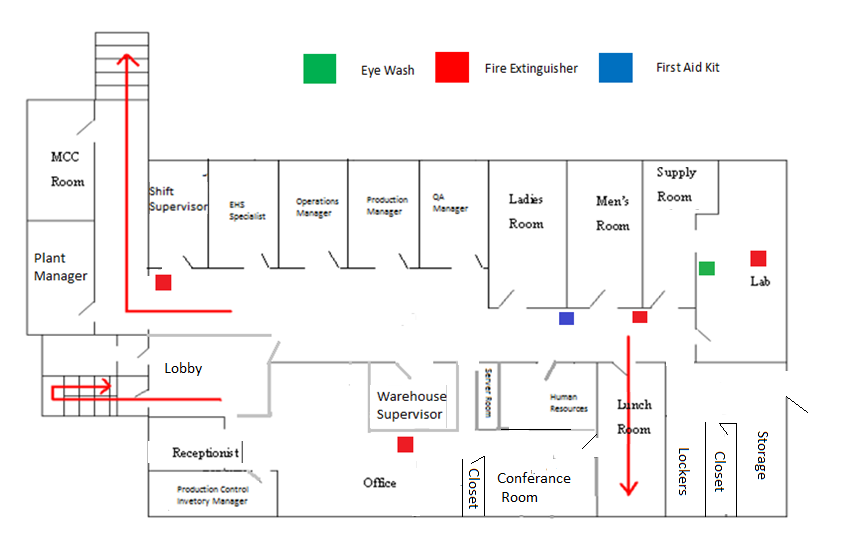
In the event that HP Hood must totally evacuate the plant facility, all employees are instructed to evacuate the building using the nearest exits and assemble in the Hood Parking Lot near the blow mold building. If it is necessary to be further away, employees will be directed to a designated location by the FEC. In case of inclement weather, the employees will be directed into the 2nd floor of the Carvel building. If the Carvel building needs to be evacuated blow mold/sales employees will go to the 2nd floor foyer of the plant unless the FEC designates a different muster point.

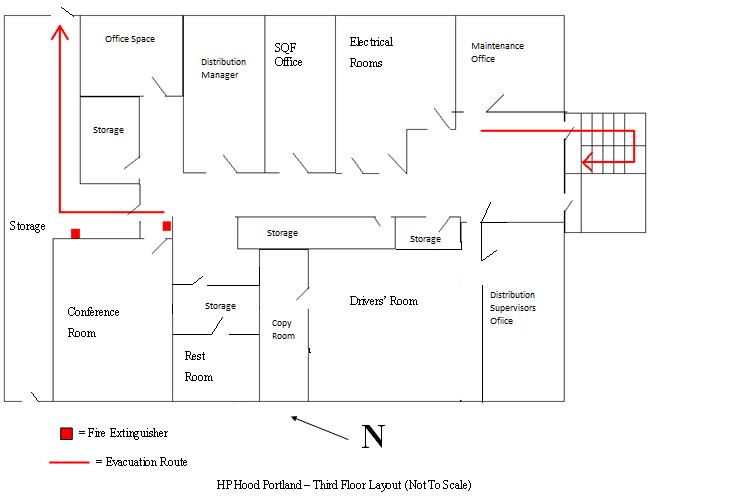
## Search And Rescue

If the headcount analysis following an evacuation reveals that people are missing, the IC will determine if a search and rescue effort should be conducted. These efforts, if necessary, will be conducted by outside trained response personnel.

Figure 13-1. Evacuation Maps









# Site Security AND Control

This Chapter describes the routine security measures HP Hood implements to protect the plant and the security measures HP Hood implements during an emergency to ensure the protection of human health, the environment and property. This Chapter meets the requirements of 29 C.F.R. § 1910.120(q)(2)(v).

## Site Security

The facility can be accessed through five entrances: main entrance, maintenance entrance, Country Department entrance, M.T. Case entrance, and shipping entrance. All contractors and visitors to the facility must authorized to be on the site by a HP Hood employee. Visitors are not permitted to roam around the facility freely unless authorized by a HP Hood employee. The facility is small and well manned and it is not possible for a guest to go unnoticed by HP Hood employees.

## Security Measures Implemented During Emergency Incidents

During an emergency incident, HP Hood evacuates all threatened personnel, forbids entry by anyone other than outside emergency responders, and establishes control zones around the affected area(s). The purpose of setting up control zones is to minimize the potential adverse impact of the incident on employees, citizens, responders, the environment, and property.

Upon notification that a hazardous materials emergency exists within the facility, the first trained responder will establish the control zones and designate other employees to assist with evacuations or perimeter security. As more qualified outside responders arrive, control zones will be modified to meet the existing situation.

Upon notification that an emergency exists within the facility, employees will immediately restrict facility access to only essential emergency response personnel. All entry points will be secured immediately, if possible.

### Establishing Control Zones

The IC, with guidance from the FEC, will immediately designate three major zones around the affected area for all emergencies. These zones serve to reduce the risk to personnel and equipment by controlling and directing tactical operations. Authorized personnel will move through access control points only. Each zone is described below.

#### A) Hot Zone (Exclusion Zone)

The Hot Zone is the area of most concern. Access into this area may be permitted only by trained responders with the use of proper PPE and the buddy system. All other Standard Safety and Operating Procedures will be adhered to for Hot Zone operations. The Hot Zone will extend far enough to prevent adverse effects from hazardous materials. Only those responders necessary to control the incident or rescue others may enter this area. No HP Hood employees may enter the hot zone.

#### B) Warm Zone (Contamination Réduction Zone)

The Warm Zone is an area of limited access. The purpose of the Warm Zone is to reduce the spread of contamination and control access to and from the Hot Zone. It also serves as a buffer zone and, at least initially, is not contaminated. Contamination in this Zone should remain in the Decontamination Corridor, which is also located in this Zone. Entry and exit from the Hot Zone will always be accomplished through the Decontamination Corridor which will be controlled and secured. PPE may be required in this area. The Back‑Up Response Team will position themselves in a clean area of the Warm Zone during Hot Zone operations. The size of this zone will be determined by the nature of the incident and the size of the decontamination operations to be conducted within. The IC, in conjunction with the FEC, will determine where the zones are for each emergency.

#### Cold Zone (Support Zone)

The Cold Zone is the area which borders the outer perimeter of the Warm Zone and is a clean area set up for support operations. It will be upwind and uphill, if possible, from the Hot and Warm Zones and as far away from the Hot Zone as necessary for safe operations. This zone will have a secure outer boundary.

### Identifying Control Zones

Control zones will be defined based on results of sampling, monitoring, and/or incident investigation. If monitoring instruments are not immediately available, the emergency response team will use physical data and chemical information to determine the safest zones. Extended zones may be necessary until the zones are accurately defined.

The criteria for establishing zone boundaries include:

1. Visual survey and investigation of the incident.
2. Location and types of hazardous materials and other hazards in the area.
3. Analysis of data on physical and chemical properties of hazardous materials involved.
4. The ability to safely access the contaminated area.
5. Area necessary for the control zones to be effective.
6. Current and anticipated weather conditions.
7. Number of personnel available to properly control these zones.
8. Number of victims and potential exposure of personnel and the public.

### Securing Control

Once the Control Zones have been determined, they will be clearly marked. This may be done by using hazard tape, rope, warning cones, or by any other effective means. Personnel will then be strategically placed around the perimeter of the Cold Zone and, if necessary, the Warm Zone to restrict access by unauthorized personnel. Personnel chosen for this job may not have completed formal emergency response training. However, they will be briefed on site safety policies and hazard exposure information.

# Decontamination Procedures And Polices

This Chapter describes the decontamination procedures followed during emergency response operations involving hazardous material at the facility. See 29 C.F.R. § 1910.120(q)(2)(vii). It should be noted that decontamination is performed by the outside contractor responding to the emergency (e.g. Clean Harbors).

## Decontamination Policies And Procedures

OSHA defines decontamination as “the means of removal of hazardous substances from employees and their equipment to the extent necessary to preclude the occurrence of foreseeable adverse health affects.” 29 C.F.R. § 1910.120(a)(3). This Chapter describes the policies and procedures to be used whenever decontamination is necessary. It also defines when decontamination is necessary.

### Importance of Decontamination

Practicing proper decontamination procedures both during and after a hazardous materials incident helps prevent unnecessary personnel exposure to hazardous materials and reduces the potential spread of the material involved. The benefits of conducting proper decontamination are critical and cannot be over-emphasized.

Contamination of personnel and equipment, even with strict safety practices, may occur. A plan to decontaminate is necessary and must be operational before any entry is made into an environment that may pose hazardous material hazards.

### General Policy

This policy applies to all responses to hazardous materials incidents and whenever people or resources are, or may be, contaminated. The policy is as follows:

1. Decontamination operations will be established before entry into the "Hot Zone" (defined in Chapter 14) is allowed. A gross emergency decontamination for quick response may be acceptable to accommodate a quick entry into the Hot Zone, until more definitive decontamination is set up.
2. All personnel and equipment that have entered the Hot Zone will be decontaminated.
3. Personnel and equipment that have entered the "Decontamination Corridor" either during or after decontamination operations have occurred will be decontaminated.
4. All personnel or equipment suspected of being contaminated will be decontaminated.
5. Injured personnel will be decontaminated.
6. The IC or FEC will research the suspected contaminants thoroughly to identify the appropriate decontamination method(s) to use. This research will also be used to choose the correct PPE for decon workers.
7. The "Decontamination Corridor" will be established and clearly identified. It will be located in the Warm Zone (defined in Chapter 14) and all decontamination activities will take place there.
8. Contamination prevention is as important as decontamination and all responders will do everything possible to avoid exposure and prevent contamination spreading.
9. All decontamination personnel will wear appropriate PPE, as identified by the IC or FEC.
10. A "Decontamination Officer" may be appointed for decontamination operations. The responsibilities of a Decontamination Officer include:

a. Reporting to the IC

b. Establishing and controlling the contamination reduction corridor

c. Safety of all decon personnel and others who enter the Decon Corridor

d. Coordinating emergency response activities between responders

e. Determining the method and type of decontamination necessary

f. Briefing and debriefing emergency responders of decontamination procedures

### Medical Decontamination Policies

The following procedures will be followed for decontaminating injured or exposed personnel during a hazardous materials incident.

Some physical injuries are minor and may be appropriately treated by trained medical responders (from outside responding agencies) at the scene, while other injuries may require more advanced medical treatment. Trained medical responders are capable of making these decisions. Medical personnel capable of providing Basic Life Support (BLS), will be present at all hazardous materials incidents.

Potentially life-threatening injuries will be treated immediately, possibly without considering decontamination. If the victim's life is in jeopardy, some form of decontamination may be possible with the initial first aid treatment, if the decontamination does not delay the first aid treatment. Some basic decontamination practices which may be utilized include:

1. Protect yourself from the contaminant by using PPE and or avoiding contamination on or around the victim, if possible.
2. Carefully remove respirators and PPE from the victim.
3. If protective clothing or suits cannot be removed easily, they may be cut off.
4. Removal of contaminated clothing and equipment should not delay first aid treatment.
5. Washing of PPE worn by the victim may be effective if it will not cause further harm.
6. Victims may be packaged in body bags, plastic, or other materials to avoid spreading the contamination when it is not possible to thoroughly decontaminate the victim or the PPE.
7. Medical personnel and facilities will be advised immediately whenever a victim is being transported or cared for and has not been thoroughly decontaminated. Medical personnel will be advised of the chemical to which the person was exposed, the chemical’s properties, hazards, known antidotes and specialized treatment, and other pertinent information. A copy of the MSDS or an uncontaminated label from the container will be given to medical personnel.

Exposure to hazardous materials may cause several different types of injuries. Immediate medical attention and definitive treatment at a medical facility is required for all exposed persons. If it is possible to perform thorough decontamination before treatment or transport without jeopardizing the welfare or life of the victim, it should be done immediately by the best possible method. The same precautions should be taken as outlined above under "Physical Injury."

### Decontamination Procedures

Each incident may require different decontamination operations. The nature of the: incident, chemical, weather, temperature, number of people to be decontaminated, and number of trained personnel available are a few of the factors which dictate the method, size, and type of decontamination operation that will be required.

Basic decontamination procedures are described below. These steps may be utilized for most incidents, unless an extremely hazardous substance is involved, which may require a more sophisticated operation and more personnel. Basic decontamination steps and procedures that may be useful include:

1. Covering the Decontamination Corridor with plastic and placement of booms or dikes to control runoff from decon operations.
2. Using collection pools to hold decontamination water runoff.
3. Demarcation of the Decon Corridor with tape, cones, ropes or other markers.
4. Have a segregated equipment drop at the edge of the Hot Zone for contaminated equipment. This equipment can be re-used in the Hot Zone without decontaminating.
5. Have an initial or "primary" decontamination wash and rinse as the first step near the Hot Zone to wash the most significant contamination off of PPE.
6. Have a secondary wash and rinse about 15 to 20 feet, or more, away from the first wash to ensure thorough decontamination of PPE.
7. Have a clean area either before or after the secondary wash to change Self Contained Breathing Apparatus (SCBA).
8. A large area near the Cold Zone (defined in Chapter 14) end of the Decon Corridor should be established to remove chemical suits, respiratory equipment, and other items.
9. Demarcate a clean (uphill) side and a dirty (downhill) side of the Decon Corridor. The clean side should be used to pass uncontaminated supplies and equipment into the Warm Zone, while the dirty side contains all of the contaminated equipment and supplies used or removed during decontamination operations.
10. All used equipment, supplies, and contaminated items, should remain in the Decon Corridor until it can be determined if these items can be decontaminated.
11. All contaminated items must be disposed of in accordance with applicable laws. An Environmental representative will ensure that contaminated items are properly packaged and disposed of.

# NOTIFICATION PROCEDURES FOR FEDERAL, STATE AND LOCAL OFFICIALS

This Chapter describes how the facility notifies federal, state, and local agencies regarding: reportable releases at or from the facility; and fatalities, hospitalization of three or more employees, and satisfies the requirements of 38 M.R.S.A. § 1318-C(1)(J) and (K); 42 U.S.C. §§ 9603 and 11004; and 40 C.F.R. §§ 302.6, 355.40.

It is the responsibility of the FEC or his designee to ensure all regulatory agencies are notified, when notification is required by law. The decision to issue warnings to local citizens regarding a chemical release is the responsibility of local officials and public safety departments of the affected communities. HP Hood will assist potentially impacted communities in a concerted effort to minimize exposure and maintain the safety of the community.

For chemical releases that go beyond the facility’s boundaries and releases of extremely hazardous substances in quantities equal to or exceeding applicable reportable quantities (see Table 2-1 for reportable quantities), the FEC will immediately notify the National Response Center (NRC).If oil or chemicals enter the city sewers, the Plant Manager will notify both Portland Water District and the Public Works Department (PWD). If the release affects the quality of milk, the Plant Manager will notify the Maine Department of Health Engineering.

## Immediate Oral Notifications For Hazardous Material Releases

If a reportable release of hazardous materials occurs (see Chapter 2), the Plant Manager, or his representative, will immediately[[4]](#footnote-4) report the incident to the:

A. Portland Fire Dept. 911

B. Maine State Police (which informs the 1-800-452-4664

State Emergency Response Commission

("SERC") and MEDEP)

C. National Response Center 1-800-424-8802

If a release leaves the boundaries of the plant, the Plant Manager or his designee will also notify, immediately, the Cumberland County Sheriff’s office at (207) 774-1444 who will notify the Cumberland County Emergency Coordinator.

The following information will be provided to all government agencies to whom HP Hood reports:

1. Specific location of release;
2. Identification and estimated quantity of hazardous material released;
3. Time and duration of release;
4. Environmental media into which the hazardous material was released;
5. Known or anticipated acute or chronic health risks;
6. Precautions that should be taken, including evacuation or medical surveillance;
7. Names and telephone numbers of parties to be contacted for further information; and
8. Any injuries.

See 37-B M.R.S.A. § 798(1); 42 U.S.C. §§ 9603 and 11004; 40 C.F.R. §§ 302.6; 355.40(b)(1); and 29 C.F.R. § 1904.8(a).

## Written Notification For Hazardous Material Releases

After a reportable release of hazardous material, the Plant Manager files follow-up reports with various agencies as follows.

As soon as practicable, but always within fourteen days, the Plant Manager sends a follow-up written notice to the community emergency coordinator in all counties likely to be affected by the release and to the SERC. This follow-up written report describes the:

1. Specific location of the release;
2. Hazardous material released and the estimated quantity;
3. Time and duration of the release;
4. Environmental media into which the hazardous material was released;
5. Known or anticipated acute or chronic health risks posed by the release;
6. Precautions that were taken, including evacuation and medical surveillance;
7. Names and telephone numbers of parties which should be contacted for further information;
8. Actions taken responding to and containing the release;
9. Cause of the release and the events leading to it;
10. Known and anticipated health risks posed by the release and any medical attention needs of exposed persons; and
11. Measures taken or to be taken to avoid recurrence.

37-B M.R.S.A. § 798(3); and 40 C.F.R. § 355.40.

Within thirty days after a reportable release, the Plant Manager files a release report with MEDEP in Portland that states the:

1. Date and time of the hazardous material release;
2. Date and time Public Safety officials were notified (State Police, Sheriff, Portland Fire Department, or the MEDEP);
3. Name and address of parties involved;
4. Exact location of the release;
5. Amount and type of hazardous material released;
6. Complete description of circumstances causing the release;
7. Amount of hazardous material recovered;
8. Method of recovery;
9. Location and method of hazardous material/debris disposal;
10. Name and address of any person, firm or corporation suffering damages due to the release; and
11. Procedures, method, and precautions instituted to prevent a similar occurrence from recurring.

See Figure 16-1.

## Immediate Oral Notifications For Oil Spills

### Oil Releases to Water

If a petroleum product release to water occurs, the Plant Manager will immediately report the incident to:

A. Local Public Safety Offices

Portland Fire Dept. 911

Portland Police Dept. 911

B. Maine State Police 800-452-4664

The Maine State Police will notify:

Department of Environmental Protection

Maine Emergency Management Agency

Cumberland County Sheriff

C. National Response Center 800-424-8802

The Response Center Operator will make

the following notifications, as applicable:

U.S. Coast Guard, District 1

EPA, Region 1

### Oil Releases to Land

If a petroleum product is released onto land in quantities equal to or greater than 25 gallons, the Plant Manager will immediately report the incident to the MEDEP at 800-482-0777. If petroleum is released onto land while filling the UST, it will be reported if the quantity releases is greater than 10 gallons. See MEDEP Chapter 690 and 691.

## Written Notification For Oil Spills

If HP Hood (1) discharges more than 1000 gallons of oil into or upon navigable waters or adjoining shorelines in a single spill event; or (2) discharges oil in harmful quantities (as defined in 40 C.F.R. Part 110) into or upon navigable water ways or adjoining shorelines in two spill events within any twelve month period, it will file a written report with EPA's Region I Administrator within 60 days from the time either (1) or (2) occurs. 40 C.F.R. § 112.4(a).

Except as noted above, no written report is required for an oil spill generally. However, the agencies notified of a spill may request a written follow-up of the incident. An accurate record of the incident will be kept and turned in to the Plant Manager, who will submit a written report if requested to do so.

## Reporting Of Fatality Or Multiple Hospitalization Incidents

Within 8 hours after the death of any employee from a work-related incident or the in-patient hospitalization of three or more employees as a result of a work-related incident, HP Hood orally reports the fatality/multiple hospitalization by telephone or in person to the nearest Area Office of the Occupational Safety and Health Administration (OSHA), U.S. Department of Labor, or by using the OSHA toll-free central telephone number.

This notification is made after each such fatality or hospitalization of three or more employees which occurs within thirty (30) days of an incident. However, if HP Hood does not learn of a reportable incident at the time it occurs and the incident would otherwise be reportable, it will report the incident within 8 hours of the time the incident is reported to any HP Hood agent or employee.

Such notifications will relay the following information: HP Hood’s name; location of incident; time of incident; number of fatalities or hospitalized employees; contact person and telephone number; and brief description of incident.

Figure. 16-1 Hazardous Material Spill

Portland Regional Office Report

This form should be filled out by the spiller and returned to the Department of Environmental Protection within thirty (30) days of the spill. Please mail to: Steven Eufemia, Bureau of Oil & Hazardous Materials, 312 Canco Road, Portland, ME 04103.

DATE & TIME OF CHEMICAL DISCHARGE:

DATE & TIME PUBLIC SAFETY OFFICIALS NOTIFIED (State Police, Sheriff, Fire Dept., or Maine DEP):

NAME & ADDRESS OF PARTIES INVOLVED:

EXACT LOCATION OF SPILL:

AMOUNT & TYPE OF CHEMICAL (S) DISCHARGED:

COMPLETE DESCRIPTION OF CIRCUMSTANCES CAUSING DISCHARGE:

AMOUNT OF CHEMICAL(S) REMOVED: METHOD:

LOCATION & METHOD OF CHEMICAL/DEBRIS DISPOSAL:

PROCEDURES, METHOD & PRECAUTIONS INSTITUTED TO PREVENT A SIMILAR OCCURRENCE FROM RECURRING:

ADDITIONAL COMMENTS:

# Incident Termination, CRITIQUE AND FOLLOW-UP REPORT

This Chapter describes HP Hood's incident termination procedures, critique, and follow-up report and satisfies the requirements found in 29 C.F.R. § 1910.120(q)(2)(ix).

## Incident Termination Policy

When a spill or release no longer poses any threat to life, the environment, or property, the IC will announce termination of the emergency phase of the incident. This decision may be based on input from the FEC and other response teams. When determining whether an emergency has ended, the IC will consider:

1. Remaining potential threat to human health and the environment;
2. Whether the incident has ceased or is under control;
3. Whether it is safe for workers to enter evacuated areas; and
4. The presence or availability of cleanup crews.

Formal termination procedures will follow all emergency incidents. These procedures include three steps: Debriefing, Post Incident Analysis, and Critique. If a hazardous waste cleanup operation is necessary, then the Plant Manager will facilitate appropriate action with the outside contractors. HP Hood personnel are not qualified to re‑enter the Hazard Sector to conduct clean‑up operations. If the incident becomes an emergency again by posing a revived threat to people, the environment, or property, an emergency can be re‑declared. Clean‑up operations that are conducted as part of the emergency phase to help mitigate the incident can only be performed by properly trained and equipped personnel (e.g. Clean Harbors).

## Disposal Procedures

The recovery of spilled chemicals and removal of contaminated debris is facilitated by an incident follow-up investigation team comprised of the FEC, selected HP Hood employees, and the outside contractor responsible for emergency response. The Plant Manager will determine the applicable federal, state, and local regulatory requirements and then select one or more of the following waste cleanup/management options:

1. Product Recovery - whenever possible and feasible, spilled and contained chemicals will be returned to their original containers or process of origin. The Plant Manager will ensure all leaks and punctures are repaired first.
2. Off-Site Disposal - Non-hazardous and hazardous wastes that cannot be recovered and reused, or diverted to the WWTP will be collected, transported, and disposed at an appropriately licensed off-site facility.

Selected cleanup and disposal options will comply with all applicable federal, state, and local laws and rules. Decontamination wastes such as gloves, protective clothing and absorbent material will be classed as hazardous or non-hazardous waste and appropriately managed.

## Incident Critique And Follow-Up Report

After each incident, a documented review is conducted by the FEC, key emergency response members involved with the incident, and others if appropriate. In addition, the Facility Evaluation Form for a hazardous materials release will be completed. See Figure 17-1 (this form is also used during drills.)The incident review will include the following:

1. What caused the incident and was it preventable?
2. What was the scope of the incident and the degree of damage?
3. Were operations interrupted and, if so, what was the loss?
4. Has the incident revealed deficiencies in any of the following areas?
5. Construction;
6. Operation procedures;
7. Employee training;
8. Employee performance;
9. Notification of local, county, state and federal agencies;
10. Coordination with public agencies; and
11. Restoration of operations.
12. What recommendations or actions are needed to prevent a similar incident?
13. Did the ICP:
14. Anticipate the incident?
15. Meet the needs of the emergency and responders?
16. Should the plan be modified? How?

The FEC will also conduct a review of the containment device and/or process from which the release occurred and measures that can be taken to ensure against reoccurrence.

Whenever this Plan fails during an emergency incident, it will be amended. Whenever the Plan is amended, the amendments will be provided to all plan recipients as soon as practicable.

Information learned from a post-incident review may be used in subsequent HP Hood training.

Figure 17-1 Facility Evaluation Form for Hazardous Materials Release

|  |
| --- |
| Facility: |
| Location: |
| Date of Exercise: Time of Exercise: |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **TYPE OF EXERCISE** |  | **INCIDENT SCENE** |  | **RELEASE** |
| Tabletop [ ]  Functional [ ]  Full Scale [ ]  Actual  [ ] |  | Fixed Facility [ ]  Transportation [ ]  a. Highway  [ ]  b. Rail   [ ] |  | Air   [ ]  Water [ ]  Soil  [ ]  Contained  [ ] |

|  |
| --- |
| **NUMBER OF RESPONSE PARTICIPANTS** |
| [ ] Facility Members [ ] Environmental Contractor  [ ] Emergency Management [ ] Red Cross  [ ] Fire Department [ ] Utilities  [ ] Police Department [ ] Transportation  [ ] State Police [ ] School Department  [ ] Sheriff Department [ ] Public Works  [ ] Rescue/EMS [ ] News Media  [ ] Elected Officials [ ] Private Industry  [ ] Environmental Agency [ ] Railroad  [ ] Neighbors/Residents [ ]  [ ] Hospitals [ ] TOTAL PARTICIPANTS |

|  |
| --- |
| **FUNCTIONS EVALUATED/TESTED** |
| Systems Tested Objectives Met  Yes No  [ ] Alerting/Warning Systems [ ] [ ]  [ ] Reporting/Notifications [ ] [ ]  [ ] Incident Command System [ ] [ ]  [ ] Communications [ ] [ ]  [ ] Evacuation Procedures [ ] [ ]  [ ] Multi-Agency Response Coordination [ ] [ ]  [ ] Response Personnel Safety (SOP) [ ] [ ]  [ ] Resource Management [ ] [ ]  [ ] Security/Traffic Control [ ] [ ]  [ ] Health & Medical [ ] [ ]  [ ] Mutual Aid/Response Contractor [ ] [ ]  [ ] Decontamination [ ] [ ]  [ ] Media Relations [ ] [ ]  [ ] Other [ ] [ ] |

Figure 17-1 Facility Evaluation Form for Hazardous Materials Release (Cont.)

|  |
| --- |
| **PROBLEMS ENCOUNTERED** |
| [ ] Inadequate Training [ ] Evacuation Procedures  [ ] Standard Operating Procedures [ ] Medical Management  [ ] Lack of Resources [ ] Security/Traffic  [ ] Lack of Personnel [ ] Lack of Agency Support  [ ] Inadequate Warning System [ ] Communications  [ ] Ineffective Command System [ ] Lack of Technical Knowledge |

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| **SUMMARY OF EXERCISE** |
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| --- |
| **CRITIQUE/LESSONS LEARNED** |
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|  |

|  |
| --- |
| **FACILITY** |
| Prepared by: Date: |
| Title: |

|  |
| --- |
| **Local Emergency Planning Committee (LEPC)** |
| Received by: Date: |
| Title: |
| Comments: |
|  |

# Pre-Emergency Planning With Outside Agencies; And Emergency Medical And Health Treatment Resources

This chapter describes the plant's pre-emergency planning activities with emergency response providers and on and off-site emergency medical treatment resources. This Chapter satisfies the requirements found at 29 C.F.R. § 1910.120(q)(2)(i) and (viii).

As described in Chapter 10, plant employees are trained to respond to Level I emergencies only. Outside agencies are contacted for offensive response to Level 2 and 3 emergencies. Therefore, HP Hood has entered into formal and informal agreements with the following entities to provide emergency assistance on an as-needed basis:

1. Portland Fire Department
2. Portland Police Department
3. Maine Medical Center
4. Mercy Hospital
5. Concentra.
6. National Response Corporation, ENPRO.
7. Miller Refrigeration

The Portland Fire Department is generally familiar with the layout of the plant, properties of the hazardous material used by HP Hood, places where personnel normally work, entrances and exits from the plant, and designated evacuation routes. Moreover, the Portland Fire Department has been provided lists of hazardous material handled in bulk (e.g., hazardous chemicals in quantities greater than 10,000 lbs and ammonia) at the plant, and information describing the location and hazardous characteristics of these hazardous materials.

## Agreements With And Responsibilities Of Outside Responders

### Portland Fire Department

HP Hood personnel are trained to let outside agencies respond to most emergencies. If off-site emergency assistance is needed, the first outside response agency called is the Portland Fire Department. The Plant Manager will inform Portland Fire Department of all information known about an emergency incident.

When the Portland Fire Department arrives at the plant it will:

1. Take charge of the emergency response;
2. Be aware of and observe proper safety precautions for any hazardous chemical(s) involved;
3. Determine if evacuation of areas outside the plant is necessary and, if so, order the evacuation by implementing the Cumberland County Comprehensive Emergency Management Plan;
4. Take actions necessary to counter the effects of the accident or incident;
5. Establish a forward command post at the scene, when necessary; and
6. Call additional local and state emergency responders, when necessary.

Portland Fire Department employees are trained to the First Responder Operations level when responding to Hazardous Material incidents. This level of training enables the Fire Department to respond defensively only, without actually trying to control the release. When the Portland Fire Department determines additional assistance is needed, it will contact other local and state emergency response teams. HP Hood has agreements with contractors who will provide offensive response and control of hazardous material release which result in “emergency incidents.” The Agreement between HP Hood and the Portland Fire Department is memorialized in a formal Mutual Aid Agreement. See Appendix B.

### Portland Police Department

The Portland Police Department works in cooperation with the fire department and the plant, and would provide the following services when asked to do so:

1. Access control
2. Crowd control
3. Removal of security threats
4. Public evacuation assistance
5. Traffic control

The Maine State Police is also available to support these activities, if requested. See Appendix B.

### Medical and Ambulance Services

In case of an emergency, HP Hood employees are taken to Occupation Health and Rehabilitation, Inc., Maine Medical Center or Mercy Hospital. Primary ambulance service is provided by the fire department with MedCu. If an individual is exposed to a hazardous material at the plant and is transferred to an off-site hospital for treatment, an MSDS or uncontaminated label will be given to the ambulance provider and sent with the exposed person(s) to assist medical providers with appropriate treatment. See Appendix B.

### Cleanup and Emergency Response Contractors

HP Hood has entered into an agreement with NRC ENPRO for ammonia releases and environmental Services for all other hazardous material releases, to provide emergency response services.

# PLANT HAZARD COMMUNICATION

## Compliance Statement

This Written Hazard Communication Plan is designed to explain how HP Hood meets the requirements of OSHA's Hazard Communication Standard (HCS). 29 C.F.R. § 1910.1200. Specifically, it describes how HP Hood obtains and uses material safety data sheets (MSDSs), labels products containing hazardous chemicals,[[5]](#footnote-5) and trains employees and contract workers about the hazardous chemicals they may be exposed to at HP Hood.

HP Hood is committed to employee safety and requires all employees to follow this plan and maintain their work areas accordingly. A copy of this Plan will be provided to HP Hood employees, their designated representatives, representatives of OSHA and the National Institute for Occupational Safety and Health ("NIOSH") upon request. In addition, other information required as part of HP Hood's hazard communication efforts (e.g., MSDSs and chemical lists) is available to workers upon request. Requesting to see such information is an employee's right and no employee will be penal­ized in any way for asking to review it. Using this information is part of Hood 's shared commitment to a safe and healthy workplace.

## Statement of Purpose

The purpose of this Hazard Communication Plan is to explain how HP Hood meets the requirements of federal, state, and local rules on informing employees about possible hazards posed by chemicals in the workplace. All employees that may be exposed to chemicals are informed of the specific hazards of the chemicals that they may contact and the appropriate protective measures to use when handling the chemicals.

## Hazardous Chemical Lists

A current master list of all hazardous chemicals present or used at HP Hood is kept by the Safety Specialist. A complete list is also included with the MSDS book. The master chemical list is updated whenever a new product containing a hazardous chemical is brought into the facility and when use of a product containing a hazardous chemical is discontinued. No new product containing a hazardous chemical may be brought into the facility unless the Plant Manager is informed and approves of the purchase.

Copies of the chemicals used in Production will be posted near the chemical containers stored by the casewashers on the production floor.

## Safety Data Sheets (SDS)

SDSs are obtained from the supplier of chemical materials and reviewed by the Safety Specialist for adequacy and accuracy. If the supplier fails to send an SDS, Hood requests for it. If an SDS is not available from the supplier, it is secured from a contract bank or the product use is discontinued.

SDSs for chemicals used at the facility are kept in the Site Hawk database on the 3rd floor employee computer terminal as well as binders by the Time Clock on the second floor. One of the books contains all chemicals used or stored on the production floor. The second book contains all other chemicals found throughout the building (i.e., Maintenance shop and Office). SDSs for the chemicals used in the Laboratory are kept in a notebook in the Laboratory.

When a product's use is discontinued and no remaining product is on-site, the product's SDS is removed from HP Hood's active SDS binder into its inactive SDS binder. In accordance with OSHA rules, HP Hood maintains MSDSs on discontinued products for at least 30 years. 29 C.F.R. §§ 1910.20(e) and 1910.1200(g).

## Labels, Labeling, and Warnings

Labels supplied by the manufacturer and found on chemical containers are checked for required information and warnings and then maintained on incoming chemical materials. The Plant Manager is responsible for ensuring that all chemicals received into the Plant are properly labeled. Materials dispensed by stores are labeled according to the information on the manufacturer's label. If the label does not contain the correct information, or is otherwise found to be inadequate, a new label is used with warnings and information supplied by the Plant Manager. Labels on incoming containers of hazardous chemicals may not be removed or defaced unless a new label or marking with the required warnings is immediately attached to the container. However, containers do not require labels if employees transfer hazardous chemicals into containers for use during their work shift and the contents of the containers are completely used, or returned to the original containers, during one work shift.

If the labels cannot be easily affixed to the container, tags, signs, process documents or other written materials will be used to label hazardous materials. The label will be legible, prominently displayed in English, as well as any other language appropriate to the workplace. The label will contain the name of the material and any warnings which may be appropriate (e.g., flammable, corrosive etc.). The name and address of the chemical manufacturer or other responsible party must be included on all materials received from a chemical manufacturer or distributor.

All pipes in the facility are labeled with the hazardous chemicals contained therein. This labeling system ensures that employees are aware of hazardous chemicals contained in pipes in the various work areas of the facility.

## Training

All HP Hood employees who work with or may be exposed to hazardous chemicals (defined at 29 C.F.R. § 1910.1200(c)) at the facility are trained on the safe use and handling of the chemicals to which they may be exposed, the federal HCS and this plan. The Plant Manager or his designee provide training to all new employees or whenever a new physical or health hazard is introduced into a work area. 29 C.F.R. § 1910.1200(h)(1). Hazard Communication Program training for new employees is included with Job Safety Training and Standard Operating Procedures. All other employees receive an annual refresher of the Hazard Standard. Written tests are given after the training to judge the effectiveness of the instruction.

### Training Materials

Materials used for hazard communication training may include:

1. Commercially Produced Safety and Hazard Communication Videotapes;
2. Material Safety Data Sheets for hazardous chemicals used at HP Hood; and
3. Training session geared to familiarize employees with, and the location of, the hazardous chemicals in their work areas.

### Scope of Training

HP Hood 's Hazard Communication training covers, but is not limited to, the following areas:

1. The requirements of, and employee rights under, the HCS;
2. The con­tent and physical location of this written hazard communication plan;
3. The identity and location of hazardous chemicals in employees' departments;
4. Safe work practices developed by HP Hood for the handling of hazardous chemicals to which employees may be exposed;
5. How to detect the presence or release of hazardous chemicals, including appearance, odor, and use of monitoring devices, where appropriate;
6. The physical and health hazards of chemicals at the facility which employees may be exposed to;
7. How employees can protect themselves from hazards potentially caused by chemical exposure or use. Such measures may include use of protective equipment, proper work practices, and emergency response and prevention procedures;
8. How HP Hood implements its hazard communication program, including how to use, read and understand product warning labels and MSDSs;
9. Implementation of HP Hood 's Contingency Plan and evacuation procedures; and
10. Employee rights under the HCS and how to obtain and use appropriate and/or additional hazard information.

See 29 C.F.R. § 1910.1200(h).

## Outside Contractors

Prior to any outside contractor starting work within the company facilities, the Plant Manager or his designee will meet with the contractor and discuss the work to be done. The contractor will be advised of the following:

1. Hazardous chemicals to which there may be possible exposure while on the job site;
2. Measures the contractor's employees may take to lessen the possibility of exposure; and
3. The availability of SDSs for all hazardous chemicals on file and where a copy may be obtained.

The contractor will also be provided with a copy of HP Hood's Hazard Communication Program. The contractor will be responsible for providing adequate safeguards so his employees can complete the work without endangering themselves or others. The contractor is expected to use signs, barricades and other appropriate means to keep unauthorized personnel out of the work area.

## Non-Routine Tasks

Any non-routine work will be reviewed for potential exposure to hazardous chemicals by the Plant Manager. Prior to starting non-standard work, each employee will be provided information about hazardous chemicals involved with such activities. This information will include:

1. Specific chemical hazards; and
2. Protective/safety measures the employee can take.

A procedure will be agreed upon detailing appropriate actions and safeguards to control exposure to any hazardous chemical. This procedure will be used whenever the work is being done.

## Hazardous Chemical Determination

Hood relies on manufacturer's SDSs to determine whether the products it uses are or contain hazardous chemicals.

## Additional Information

For additional information regarding HP Hood 's HCS plan, chemical hazards, or SDSs, employees should contact the Plant Manager.

# TRANSPORTATION ROUTES FOR EXTREMELY HAZARDOUS SUBSTANCES

This Chapter identifies transportation routes and methods for extremely hazardous substances used at the facility, and meets the requirements of 37-B M.R.S.A. § 795(1)(F).

## Anhydrous Ammonia + Production Chemicals

Anhydrous Ammonia is transported from W.H. Shurtleff Co., South Portland, ME to the HP Hood facility on Park Avenue in Portland.

All other production chemicals are supplied by Ecolab. Box truck and tanker deliveries come via Rt 495 from Massachusetts through the Maine Turnpike to the South Portland exit to Rt 295. Rt 295 off the Congress St exit to Marston Street to the facility on Park Avenue.

# INSURERS PROVIDING SUDDEN AND NON-SUDDEN ACCIDENTAL COVERAGE

This Chapter identifies the companies providing sudden and non-sudden accidental coverage to the facility, and meets the requirements of 37-B M.R.S.A. § 795(1)(G).

The facility maintains liability insurance with the following carrier:

American Home Assurance, Policy # 5744410

|  |  |  |  |
| --- | --- | --- | --- |
| portland emergency telephone numbers | | | |
| DIRECTOR OF OPERATIONS | david stevens | Cell | 207-939-0269 |
| Director of Safety | REMI FLEUETTE | CELL | 603-568-9436 |
| Plant Manager | John Marchildon | cell | 413-426-3946 |
| distribution manager | skip woods | cell | 207-415-1170 |
| EHS MANAGER |  | cell |  |
| maintenance manager | richard seiler | Cell | 207-252-0771 |
| qA manager |  | cell |  |
| warehouse supervisor | Tim Drake | cell | 207-289-0093 |
| distribution supervisor | jEFF FOSS | cell | 207-252-1639 |
| operations manager | keith sturgis | cell | 617-448-2445 |
| Production Manager | Jerry Witham | Cell | 207-939-5715 |
| Production SUPERVISOR |  | Cell |  |

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# 22 BOMB THREATS

If you receive a bomb threat, immediately call the following:

1. Your immediate supervisor
2. Plant manager

3. Police (911) - Furnish the following information:

• Street address: 349 Park Avenue

• Building Name: HP Hood

• Street intersection: Marston Street

• Your floor number and location

• Your name and telephone number

2. HP Hood Inc. (617-887-3000)

6 Kimball Lane

Lynnfield, MA 01940

Then proceed as follows:

1. Record as much information about the caller as you can using the Bomb Threat Checklist. This information will be useful in the police investigation.

2. Upon notification of a bomb threat, management will accomplish the following:

• Coordinate with the Portland Fire and Police Departments.

• If the Portland Fire and Police Departments feel the necessity to evacuate any portion of the building, or all of the building, the evacuation will be handled in an orderly manner.

For your information:

• Explosives can be concealed in a small package, shopping bag, attaché case, etc. Be on the alert for such containers left in unusual or unexpected locations. Do not touch them!

• Common explosives used in bombings are usually made of commercial dynamite and/or black powder. The dynamite generally occurs in cylinders about 1 inch in diameter and 8 inches long, covered with heavy, water-resistant paper. Black powder is generally encased in a section of pipe.

**BOMB THREAT CHECKLIST**

Page 1 of 2

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Listen. Do not interrupt the caller.** | | | | | | | |
| Your name | | | Time | | | Date | |
| Caller’s identity | | | Sex  M 🞏 F 🞏 | | | Approximate age (years) | |
| Origin of call  Local 🞏 Long Distance 🞏 Booth 🞏  **Voice Characteristics and Background Noises (Circle each appropriate description)** | | | | | | | |
| **Voice** | **Speech** | | **Language** | **Accent** | | **Manner** | **Background Noises** | |
| Loud | Fast | | Excellent | Local | | Calm | Office machinery | |
| High Pitch | Distinct | | Fair | Regional | | Rational | Factory machinery | |
| Raspy | Stutter | | Good | Eastern | | Coherent | Bedlam | |
| Intoxicated | Slurred | | Obscene | Midwestern | | Deliberate | Animals | |
| Soft | Slow | | Poor | New England | | Angry | Quiet | |
| Deep | Distorted | |  | Southern | | Irrational | Mixed | |
| Pleasant | Nasal | |  | Race | | Incoherent | Street traffic | |
|  |  | |  | Foreign | | Emotional | Airplanes | |
|  |  | |  | Asian | | Laughing | Party atmosphere | |
|  |  | |  | European | |  | Trains | |
|  |  | |  | Spanish | |  | Music | |
|  |  | |  |  | |  | Voices | |

Describe any characteristics or noises not listed above:

(continued on next page)

BOMB THREAT CHECKLIST

Page 2 of 2

|  |  |  |
| --- | --- | --- |
| **Keep the caller talking.** | | |
| If the caller is willing to keep talking, ask these questions: | | |
| When will it go off: | Certain hour: | Time remaining: |
| Where is it planted? | Building area: | |
| What kind of bomb? | | |
| Where are you now? | | |
| How do you know so much about the bomb? | | |
| What is your name and address? | | |
| Hold on the line while you notify supervisor listed here:  Supervisor | | |
| Did the caller appear familiar with the site or building by his description of bomb location? | | |

Write out the message in its entirety and any other comments below.

**Action to take immediately after the call.**

Notify the following persons in the order given:

|  |  |
| --- | --- |
| 1. Name Portland Police Department | Phone No. 911 |
| 1. Name Dave Stevens | Phone No.  Cell Phone: 207-939-0269 |
| 1. Name Keith Sturgis | Phone No.  Cell Phone: 617-448-2445 |

# 23 SEVERE STORM

In the Portland area, severe storms can occur at any time of the year and may involve rain, snow, hail, and/or high winds. During a severe storm, the following procedures should be observed:

1. If a severe storm should occur and there is no other emergency associated with it such as fire or power loss (discussed elsewhere in this plan):

• Remain at your work station and await instructions from the Supervisor or Plant Manager

• If another emergency such as fire, injury, or power loss occurs, follow the instructions in this plan for those emergencies (see Table of Contents).

2. Stay away from building windows during high winds! One of the most common injuries in buildings is from flying glass due to imploding windows during windstorms.

• Personnel occupying offices, conference rooms, or work stations next to windows on the windward side of the building may be asked by their Supervisor to move to another work area until the winds pass.

• Lower and close the blinds over the windows.

3. In the event of a severe storm, the Plant Manager will decide whether the plant is to be closed. The Plant Manager must follow company guidelines and policy before closing the plant.

# 24 POWER FAILURE

Power failures occur as stand-alone incidents or in conjunction with other emergencies. Procedures that must be observed in either situation include the following:

1. Stand-Alone Power Failure

• If a power failure occurs and there is no other emergency such as a fire that may have occurred with the power failure, remain at your work station and await instructions from the Plant Manager or Supervisor. Turn off and unplug your computer (if applicable) to guard against a possible power surge when the power is restored.

2. Power Failure in Conjunction with Another Emergency

• If another emergency such as a fire or severe storm is evident along with the power failure, also follow the instructions in this plan for those emergencies (see Table of Contents) as directed by your Supervisor.

# TORNADO

If a tornado warning is given for the Portland area, management will announce the warning over the building’s public address system. Safe areas at HP Hood are is the cellar with the doors closed. Employees should remain in these safe areas until the plant manager announces the “all clear”.

# 26 OTHER EMERGENCIES

1. Night, Weekend, or Holiday Emergencies

• In case of emergency, follow the steps listed in this plan that pertain to the particular emergency. Call emergency response personnel.

2. Evacuation of Handicapped Persons

• Each handicapped person should be evacuated with assistance from two employees. The employees are responsible for assisting the handicapped occupant to a safe location on the floor. **Do not attempt to carry the handicapped person down the stairwell. This will be performed by emergency personnel, if required.**

**27 BUSINESS CONTINUITY**

In the event of a catastrophic incident impacting our manufacturing capabilities or the inability to obtain raw materials, the following is the procedure that would be taken to ensure minimal customer interruption due to shortages in product inventory, and protect the product that is stored on-site.

* Plant Management will communicate with Senior Management/Crises Management team to update on the situation, especially as it pertains to inventory levels and the time to resume normal operations.
* For power loss events, Plant Management will work to secure power generating capabilities to protect product inventory and possibly resume limited operations until power can be fully restored.
* All product and packaging would be placed on HOLD by the QA department and released only when an inspection had been completed. Any product found to be defective or sub-standard would be destroyed.
* Senior Management will determine if internal or external manufacturers will be needed depending on the amount of time needed to resume normal operations. In all such instances affecting product produced for a customer, senior management will communicate and seek approval for sourcing product ingredients and/or packaging from alternate sources.
* Formulations, processing procedures, code dating and product specifications would be distributed to one or more of the fluid processing facilities within the HP Hood LLC structure with the assistance of the R&D technical staff.
* Packaging materials that have been cleared by the location QA department will be transferred to the plant(s) that will be making product for Portland.
* To maintain the customer ordering process, customer orders and production planning would continue to function as normal with these needs relayed to the plant(s) making product. In the event the Customer Service and Production Planning functions were also compromised, the function would be transferred to other locations within the HP Hood LLC system
* Finished product deliveries from other plant(s) would be coordinated through HP Hood LLC Production Control, Customer Service and Distribution departments.
* Senior Management will notify key customers of potential impact due to product shortages to ensure no aggressive promotions during the timeframe of minimal to no production and until normal operations resume.
* Once the production facility is ready to resume production, Senior Management will keep close communications with the alternative manufacturer(s) until the last day of production.
* Any new process equipment, piping, packaging installed during the downtime, must be validated as clean/sanitized before going on line for commercial production.

**GLOSSARY OF TERMS**

**Abrasion**………………………………………….Scraped skin

Absolute…………………………………………. A chemical substance that Is relatively free of Impurities.

**Absorption**……………………………………….Entry of a chemical into the body, through skin or eyes, often into the bloodstream.

**ACGIH**……………………………………………..American Conference of Governmental Industrial Hygienists. This group publishes the Threshold Limit Values (TLV's).

**Acid**……………………………………………….An inorganic or organic chemical that 1) is usually corrosive to human tissue and must be handled with care, 2) has a pH of less than 7.0, 3) neutralizes bases (alkalis) to form salts, 4) dissociates in water yielding hydrogen or hydronium ions, 5) may react with metals to yield hydrogen, and 6) turns litmus paper red.

**Acidosis**…………………………………………. Tissues of the body have decreased alkalinity marked by symptoms such as sickly sweet breath, headache, nausea, vomiting, blurred vision.

Acrid……………………………………………… Irritating and bitter.

**Action Level**……………………………………..The exposure level at which OSHA regulations take effect to protect employees in the work place.

**Acute**……………………………………………... Short term; can refer to an exposure or a health effect that occurs over a short period of time, such as minutes, hours, or several days.

Acute Toxicity…………………………………...Adverse health effects resulting from brief exposure to a chemical (e.g., seconds, minutes, hours).

**Adsorb**……………………………………………To collect gas or liquid molecules on the surface of another.

**Aerosol**……………………………………………A fine material suspension of liquid (mist or fog) or solid (dust, fume, smoke).

**AHERA**……………………………………………Asbestos Hazard Emergency Response Act (1986) federal law requiring local education agencies to Identity asbestos hazards and develop abatement plans.

Air Monitoring……………………………………Measurement of a chemical's concentration in air.

**Alkali**………………………………………………An inorganic or organic chemical that 1) is usually corrosive to human tissue and must be handled with care, 2) has a pH of more than 7.0, 3) neutralizes acids to form salts, 4) dissociates in water yielding hydroxide ions, 5) turns litmus paper blue, 6) may also be called a **base** or **caustic.**

**Alveoli**……………………………………………..Air sacs in the lungs where the blood picks up oxygen.

**Ambient**…………………………………………...Usual or surrounding conditions.

Amnesia…………………………………………..Memory loss.

Analgesia…………………………………………Reduced sensitivity to pain.

Anemia……………………………………………A reduction in the number of blood cells, caused by bleeding, destruction of blood cells, or an inability to replace blood cells.

**Anesthesia**……………………………………….Loss of sensation, including loss of touch, pain, vibration sense, and/or temperature sense.

**Angina Pectoris**…………………………………Chest Pain caused by inadequate blood supply to the heart.

**Anorexia**………………………………………….Loss of appetite.

Antidote…………………………………………..A remedy to revive. prevent or counteract the effects of poison.

**Anuria**……………………………………………..Loss of the ability to urinate.

**Anxiety**……………………………………………Severe nervousness.

**API**…………………………………………………American Petroleum Institute. trade association representing U.S. petroleum producers.

**Apnea**…………………………………………….. Breathing has stopped.

**Arrhythmia**……………………………………….Irregular heartbeat.

**Aromatic**………………………………………….An organic compound that containsa benzen ring In Its molecule.

**Asphyxia**………………………………………….Lack of oxygen or inability of cells to use oxygen (I.e., carbon monoxide) causes suffocation.

**Asphyxiant**………………………………………..A substance that causes suffocation.

Asphyxiant, Chemical………………………….An agent that prevents the blood from carrying oxygen (e.g.. carbon monoxide) or that poisons the cell's ability to use oxygen (cyanide).

**Asphysiant, Simple**…………………………….An Inert gas (e.g.. nitrogen. argon) which has no Inherent toxicity, but which can displace oxygen from air causing smothering or suffocation.

**Aspiration**………………………………………..Drawing the chemical fumes down into the lungs.

**Asthma**……………………………………………A medical disorder which causes attacks of wheezing, chest tightness, shortness of breath, and/or coughing due to spasmodic contraction of the air passages.

**Atasia**……………………………………………..A lackof coordination or movement**.**

**ATSDR**……………………………………………Agency for Toxic Substances and Disease Registry; federal agency that carries out the health-related responsibilities of RCRA and CERCLA

**Autoignition Temperature**…………………….The temperature a substance must be to catch on fire without a spark or flame.

**BACT**……………………………………………...Best Available Control Technology; an

emissions standard under CAA determined for a specific facility based on energy, environmental and economic impact costs, and available technologies.

**Base**……………………………………………….Analkali (see Alkali).

**Benign**…………………………………………….Not harmful, may refer to a noncancerous tumor.

**Bioaccumulative**………………………………..A characteristic of a chemical to Increase its concentration In an organism's tissue relative to Its exposure and more than it excretes or metabolizes.

**Biological Monitoring**………………………….Evaluation of exposure to a chemical

analyzing bodily fluids or tissues.

**Blurred Vision**………………………………….. lnability to see clearly.

**Boiling Point**….………………………………….Point at which a chemical liquid becomes a vapor.

**Bradycardia**….…………………………………..Slowed heartbeat (l*ess* than 60 beats per minute).

**Bronchioles**……………………………………...Smaller air passages of the lungs which

branch off the bronchi.

**Bronchiolitis Obliterans**……………………….A serious lung condition caused by massive exposure to an irritant and resulting in obliteration of the small breathing tubes (bronchioles) and replacement with scar tissue.

**Bronchitis**………………………………………..An inflammatory condition of the airways (bronchial tubes) resulting in coughing up of sputum.

**Bronchospasm**………………………………….A condition caused by the airways and resulting in wheezing sounds and shortness of breath.

**Bronchus**…………………………………………(Plural: Bronchi; sometimes called Bronchial Tubes). Air passages branching off the windpipe to carry air to the lungs.

**Burn**……………………………………………….Destruction of skin or other tissues

**CAA**……………………………………………….Clean Air Act (1955, 1977); federal law mandating and enforcing toxic emissions standards for stationary sources and motor vehicles.

**Cancer**……………………………………………An uncontrollable growing mass of tissue which can cause serious health effects or death.

**Carcinogen**………………………………………A cancer-causing substance (e.g, asbestos, benzene).

**Carcinoma**……………………………………….A type of cancer.

**Cardiovascular**………………………………….Relating to the heart and blood vessels.

**Caustic**……………………………………………An Alkali (see Alkali).

**Ceiling Limit**……………………………………..The concentration of a chemical that should not be exceeded during any pat of the working exposure.

**Central Nervous System (CNS)**………………The brain and spinal chord.

**Central Nervous System Depression**……….Drowsiness. dizziness and headache caused by chemical acting on the brain. Higher doses can cause unconsciousness, coma or death.

CERCLA…………………………………………..Comprehensive Environmental Response Compensation and Liability Act of 1980. It is commonly known as SUPERFUND.

**CFC**………………………………………………..Chlorofluorocarbon chemical substance associated with the depletion of Earth's ozone layer.

**Chelating Agent**…………………………………A chemical compound used to treat metal poisoning in the body (i.e., lead)

**Chemical Burn**…………………………………..Destruction of skin or other tissue similar to that of a thermal bum, but caused by contact with a chemical.

**Chemical Pneumonitis**…………………………Inflammation of the lungs caused by inhaling a chemical that is irritating or otherwise toxic to the lungs.

**Chemtrec**…………………………………………Chemical Transportation Emergency Center (1- 800-424-9300). A Public service by the Chemical Manufacturers Association. Emergency advice is provided to the On-Scene Incident Commander during a response to a release of hazardous chemicals.

**Chilis**………………………………………………A sensation of cold associated with shivering and often fever.

**Chloracne**……………………………………..…A sever form of skin acne caused by exposure to certain chlorinated chemical compounds.

**Chronic Effects**………………………………….May not show up for many years or may last over a long period of time.

**Chronic Toxicity**………………………………...Adverse health effects resulting from long-term exposure to a chemical (e.g., months, years, decades).

**CMA**……………………………………………….Chemical Manufacturers Association; Washington D.C. based trade association.

**CNS**……………………………………………….See Central Nervous System.

**CNS Depression**………………………………..See Central Nervous System Depression.

**Colic**………………………………………………Crampy pain of the abdomen.

**Coma**………………………………………….…..Extended loss of consciousness due to an Injury, Illness, or poison.

**Combustible**…………………………….……….A substance's ability to catch fire; in general, a liquid with a flash point above 1000 F. Paper materials that can be ignited are also considered a combustible**.**

**Concentration**…………………………………...Strength of a chemical in the air or in a liquid solution; often described in parts per million (ppm) milligrams per cubic meter {mg/m3) or percent (%).

**Confined Space**…………………………………An enclosed space with little ventilation where an oxygen-deficient environment may develop or where chemicals may reach high concentrations; may be entered only when properly trained and equipped; examples include storage tanks, vaults, pits, tunnels, silos, sewers, and boilers.

**Conjunctivitis**……………………………………Inflammation of the tissues of the eye, and may be a response to chemicals in the eye.

**Contact Dermatitis**……………………………..Skin rash caused by contact with something (chemical, soap, cosmetic, jewelry); may be due to irritation or an allergic reaction (sensitization).

Contracture………………………………………Scarring of the skin and/or subcutaneous tissues causing a limitation of the normal movement of a body part.

**Convulsions**……………………………………..Seizures or fits, as in an epileptic; violent spasms of the body.

**Corrosives**……………………………………….Cause bums or damage to the skin. Corrosives may also dissolve or degrade metals and other materials.

**Cutaneous**……………………………………….Pertaining to the skin (dermal).

**CWA**………………………………………………Clean Water Act (1972); federal law regulating the discharge of pollutants into surface waters.

**Cyanosis**…………………………………………Blush color of the skin and lips due to a lack of oxygen In the blood.

**Delirium**…………………………………………..A mental state characterized by confusion, disturbed or slurred speech, and sometimes , hallucinations.

**de minimis**………………………………..………Settlement; financial settlement with a PRP responsible for as relatively small amount of contamination at a hazardous waste site.

**Dermal**………………………………………….…Pertaining to the skin (cutaneous).

**Detector Tubes**……………………………….…CoIor-changing tubes through which air can be drawn to detect the presence of chemicals.

**Diaphoresis**………………………………………Sweating, profuse perspiration.

**Diarrhea**…………………………………………...Loose and frequent stools.

**Dose**……………………………………………....The amount of a substance that reaches the sensitive body tissues or target organs and causes effect(s).

**Dose/Response**…………………………………The relationship whereby increased health effects are experienced as the dose increases.

**DOT**………………………………………………..United States Department of Transportation.

**DRE**………………………………………………..Destruction and Removal Efficiency; measure of the effectiveness of incineration in removing contaminants.

**Dust**……………………………………………….Solid particles suspended in air, usually produced by some mechanical process such as crushing, grinding, abrading, or blasting.

**Dysfunction**………………………………………Impaired or abnormal function.

**Dyspnea**…………………………………………..A sensation of shortness of breath**.**

**Ecchymosis**…………………………………...…Bruise.

Eczema………………………………………...…A skin rash characterized by redness, itching, sometimes blistering; may become scaly or crusty.

**EEC**………………………………………………..European Economic Community; 12-nation organization representing member interests in European trade.

**Edema**…………………………………………….Swelling due to accumulation of fluid In tissues.

**EIL**…………………………………………………Environmental Impairment Liability legal and financial liability associated with "sudden and non-sudden" contamination.

**Emergency Response Team**………………….A team of Individuals properly trained and

medically certified to respond to industrial emergencies and to enter IDLH environments.

**Emesis**…………………………………………….Vomiting.

**Emetic**……………………………………………..An agent such as syrup of ipecac which

induces vomiting. Never use emetics if victim is not alert or after ingestion of solvents; always seek medical advice before giving an emetic.

**EPA**………………………………………………..United States Environmental Protection Agency. Responsible for enforcement of federal laws protecting the environment.

**Epidermal**…………………………………………Pertaining to the outer layer of skin.

**Epistaxis**………………………………………….Nosebleed.

**ERT**………………………………………………..See Emergency Response Team.

**Erythema**……………………………..…………..Redness of the skin; usually due to a local increase In blood flow.

**Etiology**……………………………………..……The cause of a medical condition or disease.

**Euphoria**………………………………………....A feeling of well-being or elation.

Evacuate…………………………………………To quickly and calmly leave an area in order to avoid exposure to a potentially harmful situation.

**Evaporation Rate**……………………………….How fast a chemical changes from a liquid to a vapor{compared to butyl acetate).

**Exothermic**……………………………………….Exothermic is usually referenced in relation to chemical reactions that produce heat.

**Explosive**…………………………………………A material that produces a sudden. almost Instantaneous release of pressure. gas, and heat when subjected to abrupt shock, high temperature. or an ignition source.

**Exposure**…..…………………………………….The quantity and extent of external contact with a toxic substance.

**Fasciculation**…………………………………….Twitching.

**Febrile**………………………………………….....Running a fever.

**Fibrosis**…………………………………………...Scarring; scarring In the lungs may affect oxygenation of blood.

**FIFRA**…………………………………………..…Federal Insecticide, Fungicide and

Rodenticide Act (1972, 1988) federal law mandating toxicity testing and registration of pesticides.

**Fire Classes & Extinguishing Agents**…….…**Class A -**Ordinarv combustibles**.**

1. Water

**Class B** -Flammable liquids.

1. Carbon Dioxide

2. Dry chemical

3. Foam

4. Halon

**Class C** -Electrical

1. Carbon Dioxide
2. Dry Chemical
3. Halon

**Class D** -Combustible metals**.**

1. Special agents (Powder**)**

**Flammable**…………………………………………Readily capable of catching fire.

**Flammable Limits**………………………...……...The range of temperature and concentration that a substance will burn.

**Lower Explosive Limit (LEL)**…………………..The leanest gas or vapor/air mixture that can be ignited by a spark or flame.

**Upper Explosive Limit (UEL)**…………………..The richest gas or vapor fair mixture that can be ignited by a spark or flame.

**Flashback**…………………………………………Fire traveling along a vapor trail to its source.

**Flashpoint**………………………………………...The temperature at which enough vapor is present to catch on fire when a flame or spark is passed.

**Fracture**……………………………………………Broken bone.

**Full Protective Clothing**………………...………Full protective clothing means protection to prevent gases, vapors, liquid and solids from coming In contact with the skin. Full protective clothing includes a helmet, self-contained breathing apparatus, coat and pants customarily worn by fire fighters (turn-out or bunker coats and pants), rubber boots, gloves, bands around legs, arms waist, and face mask, as well as covering for neck, ears and other parts of the head not protected by the helmet. positive pressure breathing apparatus and face mask.

**Full Thickness Burn..**…………………………...Third-degree bum causing complete destruction

of the skin and subcutaneous tissues Including nerves and blood vessels; the skin may appear charred or ulcerated.

**Fumes..**……………………………………………Tiny solid particles formed by the vaporization of a solid which then condense in air: particles are usually of a size which readily reach the air sacs (alveoli) of the; lungs.

Gas……………..……………………………….… A formless fluid which disperses in air, often found in tanks or cylinders and may be created by a chemical reaction.

**Gastrointestinal**..……………………………….. Relating to the stomach, intestines, or other digestive organs.

**GNP**..……………………………………………….Gross National Product; the total market valueof all goods and services produced by a nation during a specific period.

**GTEL**……………………………...………………..EnvironmentalTesting Laboratory-a subsidiary of GTI.

**GTI**………………………………………………….Groundwater Technology, Inc. The leading groundwater remediation company in the world.

**Hazard**……………………………………………..The likelihood of injury under a given set of environmental conditions; for a chemical this depends on toxicity, level of exposure, duration, and individual susceptibility.

**Hema**……………………………………………….Blood

**Hematoma**…………………………………………Bleeding into the tissues.

**Hematuria**………………………………………….Blood in the urine; gross hematuria results from enough blood to turn the urine orange or red; microscopic hematuria cannot be seen with the naked eye.

**Hemolysis**…………………………………………Destruction of red blood cells.

**Hemolytic Anemia**………………………...……..A loss of red blood cells due to destruction.

**Hemoptysis**,………………………………………Coughing upblood.

**Hemorrhage**………………………..……………..Lossof blood in significant amounts; can be external bleeding, as with a laceration, or Internal bleeding.

**Hepatic**…………………………………………….liver (Hepatoxic: harmful to the liver).

**Herbicide**……………………………………….... A poison that kills plant life or vegetation.

**High Explosive**…………………………………. Any explosive with a detonation rate at three or four miles per second. High explosives may be primary or secondary. Primary high explosives are very sensitive to heat and shock. Secondary explosives are not.

**Hose Mask**……………………………………..… Indistinction to a filter mask, one supplied with unmodified air through a hose or piping.

**HSWA**…………..………………………………….Hazardous and Solid Waste Amendments (1984) amendments to RCRA establishing a timetable for landfill bans and more stringent requirements for USTs.

**Hypersensitivity**………………………………….Conditionof being sensitized or allergic to a specific chemical.

**Hyperthermia**……………………………..………Excessively high body temperature.

Hyperventilation…………………………………Rapid, deep breathing.

**Hypothermia**……………………………………..Excessively low body temperature.

**Hypoxia**………………………………………….. Low oxygen content of the blood.

**ICS**…………………………………………………Incident Command System, the combination of facilities. equipment, personnel, procedures, and communications operating within a common organizational structure (usually at emergency situations).

**IDLH**……………………………………………….Immediately Dangerous to Life and Health are the conditions of this space or material to be handled.

**IEMS**……………………………………………… Integrated Emergency Management System. developed by FEMA, that provides a generic system for dealing with chemical spills or other emergencies.

**Ignition Temperature**………………………….. Ignition temperature of a substance, whether solid, liquid or gaseous, Is the minimum temperature required to initiate or cause self- sustained combustion Independently of the heating or heated element.

**Impermeable**……………………………………..Not allowing passage of a chemical; for example chemical-resistant gloves or apron.

**Impervious**……………………………………….Impermeable.

**Incompatibility**…………………………………..Not to be stored or mixed together.

**Individual Susceptibility**……………………… Differencesbetween Individuals in their response to a given toxic exposure (see also Susceptibility).

**Industrial Hygienist**……………………………..Person with special training and experience in assessing and dealing with occupational health and safety hazards.

**Inert**………………………………………………..Chemically and biologically inactive; does not react with the body.

**Inflammable**………………………………………Readily capable of catching fire; do not confuse with non-flammable.

**Ingestion**…………………………………...…….Swallowing a chemical substance; may Inadvertently result from eating, drinking or smoking in the work place or with contaminated hands.

**Inhalation**…………………………………………Entry of a chemical substance to the lungs by breathing.

**Inhalation Valve**…………………………………A device that allows respirable air to enter the facepiece and prevents exhaled air from leaving the facepiece through the intake opening.

**Inorganic Compounds**..……………………….Chemical substances that do not contain carbon and hydrogen.

**Irritant**………………………………………..……A substance capable of causing irritation to the skin, eyes, nose, throat, or lungs.

**Insecticide**………………………………………..A poison that kills insects**.**

**Jaundice**………………………………………….Yellowing of the skin; may be caused by liver damage, gal bladder disease, or hemolysis.

Laceration………………..………………………Cut skin or tissue.

**Lacrimation**………………………………………Production of tears by the eyes.

**Land Ban**…………………………………………Land Disposal Restrictions for various types of hazardous wastes such as Dioxin wastes and certain spent solvents (fOO1-fOO5).

**Lassitude**…………………………………………Weariness, tiredness.

**Latency**……………………………………………Period of time between exposure and symptoms of toxicity.

**Lavage**…………………………………………….Rinse with water.

**Lethargy**..…………………………………………A sense of fatigue, drowsiness, and laziness.

**LD-50**………………………………………………Lethal dose to 50% of a certain population.

**Local Toxicity**……………………………………Adverse effect of a chemical at the point where the chemical contacts the body.

**LQG**………………………………………………..Large Quantity Generator of hazardous materials.

**MADEP**……………………………………………Massachusetts Department of Environmental Protection.

Malaise…………………………………………….A vague, generalized ill feeling.

Material Safety Data Sheet (MSDS)…………..A fact sheet summarizing information about the manufacturer, the identifies, hazardous properties, and protective measure required for the safe handling of a chemical or mixture of chemicals.

**MCGLs**…………………………………………….Maximum Contaminant Level Goals; nonenforceable health goals for the maximum level of a contaminant in water delivered to users of public water systems.

**MCP**……………………………………………….Massachusetts Contingency Plan

**Metabolism**………………………………………The process of change some chemicals go through after absorption by the body.

Milligrams per cubic meter(mg/m3)………… A concentration unit for air contaminants; mass of the contaminant divided by the volume of air containing it.

**Miosis**……………………………………………..Pinpoint pupils of the eye.

**Mists**………………………………………………Suspension of very small liquid droplets. Generated by a gas condensing to a liquid state, or by the aerosolization of a liquid.

**Mitigation**…………………………………………Actions which lessen or reduce the potential fo1- emergencies, short or long tem1.

**Mutagen**…………………………………………..A chemical capable of causing mutations; mutagens may affect future generations if spermor egg cells are affected**.**

**MWRA**…………………………………………….Massachusetts Water Resource Authority.

**Myalgias**………………………………………....Muscle aches.

**Narcosis**…………………………………………Sleepiness or a state of unconsciousness caused by a chemical.

Nausea…………………………………………..An urge to vomit.

**NCP**………………………………………………National Oil And Hazardous Substance Pollution Contingency Plan (40 CFR Part 300), prepared by EPA to put Into effect the response powers and responsibilities created by CERCLA and the authorities established by Section 311 of the Oean Water Act.

**Necrosis**…………………………………………Death of cells or tissue.

**Nephritis**…………………………………………Inflammation of kidneys (Nephratoxic: harmful to kidneys).

**Nephrotoxic**…………………………………….Toxic to the kidneys.

**Neural**……………………………………………Nerves (Neural toxic: harmful to nerves).

**Neurotoxic**………………………………………Toxic to the nervous system.

**Neutralize**……………………………………….To render chemically harmless; to bring a solution to pH of 7.0 by adding acid (base) to a basic (acidic) compound.

**NFPA Hazard Classification**…………………The numerical designations of relative accident potential based on probable outcomes should an accident occur. Used at fixed sites.

**NIOSH**……………………………………………National Institute *for* Occupational Safety and Health.

**Nitrates**………………………………………….Compounds containing nitrogen and oxygen. Many of the nitrates are potent oxidizers and can be shock-sensitive.

**NPDES**…………………………………………..National Pollutant Discharge Elimination System; federal permitting system under

EPA for hazardous effluents.

**NPDWR**…………………………………………National Primary Drinking Water Regulations; part of 1986 SDWA amendments for regulations regarding drinking water contaminants.

**NPL**………………………………………………National Priorities List; official list of hazardous waste sites to be addressed by CERCLA.

**NRC**…………………………………………….. National Response Center. a communications center for activities related to response actions, is located at Coast Guard headquarters in Washington. DC. The NRC receives and relays notices of discharges or releases to the appropriate On Scene Coordinator, disseminates OSC and ART reports to the NRT when appropriate. and provides facilities for the NRT to use In coordinating a national response action when required. The toll free number (800-424-8802. or 202-267-2675 in the Washington. DC area) can be reached 24 hours a day for reporting actual or potential pollution incidents.

**NRT**……………………………………………..National Response Team, consisting of representatives of 14 government agencies (DOD, DOl, DOT /RSPA, DOT /USCG, EPA, DOC FEMA, DOS, USDA, DOJ, HHS, DOL, Nuclear Regulatory Commission, and DOE}, is the principal organization for implementing the NCP. When the NRT is not activated for a response action, it serves as a standing committee to develop and maintain preparedness, to evaluate methods of responding to discharges or releases, to recommend needed changes in response organization, and to recommend revisions to the NCP. The NRT may consider and make recommendations to appropriate agencies on the training, equipping, and protection of response teams, and necessary research, development, demonstration, and evaluation to Improve response capabilities.

**Nuisance Dust**…………………………………Generally innocuous dust. Not recognized as the direct cause of a serious pathological condition, but Irritating at high concentrations.

**Nystagmus**……………………………………. Rapid, rhythmic. Involuntary horizontal movements of the eyes.

**Odor Threshold**……………………………….The lowest concentration detectable by odor; note that published values vary greatly, as does an individual's ability to detect chemical odors; air monitoring is a much more reliable way to detect chemical hazards for many substances.

**Olfactory**………………………………………..Relating to the sense of smell.

**Olfactory Fatigue**……………………………..Inability to smell something as the concentration Increases or after adjusting to the odor; this is a classic property of hydrogen sulfide.

**Oliguria**…………………………………………Markedly reduced urineoutput.

**Oral…**……………………………………………Relating to the mouth.

**Organic Solvents**……………………………..Liquid chemicals (hydrocarbons} that can dissolve oil and grease. "Organic" compounds are a broad class of chemicals and refer to the chemicals that contain carbon and hydrogen atoms.

**ORS**……………………………………………...Environmental Recovery Systems Equipment Manufacturing Firm -a subsidiary of GTI.

**OSHA**……………………………………………Occupational Safety and Health Administration, established by the act of 1970.

**OSWER**………………………………………….Office of Solid Waste and Emergency Response, a division of EPA

**OVA**……………………………………………...Organic Vapor Analyzer.

**Overexposure**……………………………….....A high level of exposure to a chemical which may cause health effects.

**OWPE**……………………………………………Office of Waste Programs Enforcement, a division of EPA.

**Oxidizers**……………………………………….Any element, compound or mixture that acts as an oxidizing agent. Any substance that readily gives up oxygen or other oxidizers.

**Oxygen Deficiency**……………………………An environment with too little oxygen. Air normally contains 21% oxygen; below 16%, symptoms may develop.

**Pallor**…………………………………………….Pale skin appearance.

**Palpitations**…………………………………….A sensation of fluttering of the heart, irregular heartbeat, or pounding of the heart

**Paralysis**………………………………..……...Inability to move a part of the body.

**Paresthesias**…………………………………..Altered sensations of the skin, often numbness and tingling, or "pins and needles" sensation.

**Part A Permit**…………………………………..The first part of the RCRA permit allowing the operation of TSDF interim status until granting a Part B permit approval.

**Part B Permit**………………………………….The second. narrative section submitted by generators in the RCRA permitting process. Covers the S.O.P.s followed at the facility for safety and health of the workers and the environment

**Partial Thickness Burn**………………………Second-degree burn into the dermis of the skin causing blistering and redness

**Particulates**…………………………………….Solid or liquid particles suspended in air; aerosol.

**Parts per Billion (ppb)**………………………..Unit of concentration of an air contaminant; one part contaminant {by volume) per billion parts air {by volume).

**Parts per Million (ppm)**………………………Unit of concentration of an air contaminant; one part contaminant (by volume) per million parts air (by volume).

**PCBs**……………………………………………Polychlorinated biphenyls

**PEL..**………………………………...…………..Permissible Exposure Level -OSHA standard which means that it is a violation to expose workers to levels above the standard.

**Penetration**…………………………………….The flow of a dangerous liquid or vapor through porous materials. seams, pinholes, zippers or other imperfection in protective clothing.

**Percutaneous**…………………………………Through the skin; often referring to absorption of a chemical.

**Peripheral Nervous System (PNS)**……….. Nerves outside of the brain and spinal chord Including motor nerves to control the function of muscles, sensory nerves to carry sensations to the brain, and autonomic nerves to control a variety of organ functions.

**Permeation**…………………………………….The flow of a dangerous liquid or vapor through porous materials, seams, pinholes, zippers or other Imperfections in protective clothing.

**Permissible Exposure Limit (PEL)**………..The maximum air concentration permitted by law for a chemical exposure in the workplace; typically based on an 8-hour time-weighted average exposure.

**Personal Protective Equipment (PPE)**……Clothing such as gloves, gauntlets, aprons or suits, and devices such as safety glasses, respirators, or ear plugs used to protect workers from occupational hazards.

**Peroxides**………………………………………Unstable, can cause explosions.

**Pesticidex**………………………………………Chemicals designed to kill pests such as insects, rodents, weeds, etc.; most are toxic to humans.

**PH**……………………………………………..….Acidic or basic corrosives are measured on a pH scale.. 7.0 is the neutral point on the scale. Corrosives with a pH below 7.0 are considered acidic and those above 7.0 are considered to be basic (or caustic).

**Pharyngitis** Inflammation of the throat; may be caused by chemical irritation, a cold virus, or a bacterial infection.

**Phlegm**………………………………………….. Thick, coughed-up sputum or mucous.

**Photophobia**……………………………………Pain or discomfort around bright light.

**Placard**………………………………………….. A sign that Identifies hazardous materials and may indicate appropriate precautions). Placards are used on large containers.

**Pleural**……………………………………………Relating to the lining around the lungs.

**Pneumoconiosis**……………………………….Dusty lung, as a result of the continued inhalation of various dusts and other particles.

**Pneumonia or Pneumonitis**………………….Inflammation of the lungs. May be caused by chemical Irritation, bacteria or viruses.

**PNS**……………………………………………….See Peripheral Nervous System.

**Poison**……………………………………………Any substance that has the ability to destroy life when exposure is limited to small amounts that are Inhaled, absorbed or ingested over a short period of time.

**Poison Control Center**………………………..A regional center staffed 24 hours a day to answer Inquiries and to assist in the proper management of poisoning: usually associated with a major hospital's emergency department.

**Polymerization**………………………………….A chemical reaction in which two or more small molecules combine to form a larger molecule. Molecules of a chemical can react with each other altering their properties. Can make chemicals hazardous or release a hazardous gas.

**Ppb**………………………………………………See Parts per Billion.

**PPE**………………………………………………See Personal Protective Equipment.

**Ppm**……………………………………………...See Parts per Million.

**Ppq**………………………………………………See Parts per Ouadrillion.

**PAP**………………………………………………Potentially Responsible Party, to be held responsible by EPA for the financial costs of cleanup at a hazardous waste site.

**Prostration**……………………………………..A state of total mental or physical exhaustion.

**Proteinuria**……………………………………..Protein in the urine; sometimes may be a sign of kidney damage.

**Pulmonary**…………………………………….. Relating to the lungs.

**Pulmonary Edema**…………………………….Filling of the lungs with fluid: can be caused by lung damage, excessive fluid in the body or congestive heart failure.

**Pyrophoric**……………………………………..A substance which can catch fire when exposed to air at temperatures below 130°F, even without an Ignition source.

**Pyrophoric Liquid**…………………………….Any liquid that ignites and burns spontaneously in dry or moist air at or below 130°F.

**Radioactive**…………………………………….Any type of substance that liberates radioactive particles or energy due to unstable atoms that have disintegrating nuclei.

**RADS**…………………………………………… See Reactive Airways Dysfunction Syndrome

**RBC**…………………………………………….. See Red Blood Cell.

**RCRA**……………………………………………Resource Conservation and Recovery Act (of 1976) established a framework for the proper management and disposal of all wastes. RCRA directed EPA to identify hazardous wastes, both generically and by listing specific wastes and Industrial process waste streams.

## Reactive Airways Dysfunction Syndrome

**(RADS)**………………………………………….An asthma-like condition caused by a severe acute exposure to a pulmonary irritant.

**Reactive Materials**…………………………..Any element or compound that will spontaneously enter into a chemical reaction.

**Re-breather**……………………………………Any breathing device that deans the exhaled air of the user and mixes with fresh air in order to provide an on-going air supply.

**Reconnaissance**……………………………..To go and physically observe the conditions that constitute an emergency situation.

**Red Blood Cell (RBC)**………………………..Blood cells that look red and carry oxygen around the body.

**Renal**……………………………………………Relating to the kidneys.

**Respiratory**…………………………………….Relating to the lungs, airways, nose, mouth, or throat.

**Respirators**…………………………………… Filter or absorb chemicals in the air or supply air from an independent source.

**Respiratory Distress**…………………………Severe difficulty breathing.

**Rhinorrhea**……………………………………. Runny nose.

**RI/FS**…………………………………………….Remedial Investigation and Feasibility Study, an EPA investigation at a SUPERFUND site to assess contamination.

**RIP**………………………………………………RCRA Implementation Plan, addresses enforcement activities for TSDF's with groundwater monitoring.

**Route of Entry** **or Route of Exposure**……..The way a chemical enters the body; Inhalation, skin contact, eye contact, and Ingestion.

**RRT**…………………………………………….. Regional Response Teams composed of representatives of Federal agencies and a representative from each state in the Federal region. During a response to a major hazardous materials Incident Involving transportation or a fixed facility, the OSC may request that the RATs be convened by the chair when a hazardous materials discharge or release! exceeds the response capability available to the OSC In the place where it occurs; crosses regional boundaries; or may pose a substantial threat to the public health, welfare, or environment, or to regionally significant amounts of property. Regional contingency plans specify detailed criteria for activation RATs. RATs may review plans developed in compliance with Title III, if the local emergency planning committee so request.

**RQ**………………………………………………. Reportable Quantity

**Safe Limits**……………………………………..The practical certainty that injury or illness will not result from the use of a substance under specified conditions of quantity and manner of use.

**SARA**…………………………………………… The Superfund Amendments and Reauthorization Act of 1986. Title III of SARA includes detailed provisions for community planning, and community Right-To-Know.

**Sarcoma**……………………………………….. A type of cancer.

**SCBA**…………………………………………… Self-contained breathing apparatus.

**SDWA**……………………………………………Safe Drinking Water Act, establishes maximum contaminant levels for drinking water.

**Seizure**………………………………………… An episode of fIts or convulsion, such as in an epileptic, characterized by violent body spasms.

**Sensitization**………………………………….. The development of an allergic reaction to a chemical.

**Sensitizer**……………………………………...An agent capable of causing sensitization or allergic reactions.

**Shock**…………………………………………...A state of reduced blood pressure and/or blood volume resulting in depression of bodily functions; may be caused by injuries involving loss of blood, bums. or crushing of a body part; often is associated with pale, cool skin and a thready pulse.

**Smoke**…………………………………………..An air suspension of particles. often originating from combustion or sublimation.

**Solubility in water**…………………………….The ability of a substance to dissolve in water .

**Solution**………………………………………...Mixture of one or more substances in another substance, usually a liquid in which all the ingredients are completely dissolved.

**Solvent**………………………………………….A liquid substance capable of dissolving a solid substance, e.g., toluene. xylene.

**Somnolence**…………………………………...Sleepiness.

**Spasm**…………………………………………..Abnormal and involuntary muscle contraction.

**SPCC Plan**…………………………………….. Spill Prevention, Control and Countermeasures Plan describes emergency plan for releases of oil from above ground bulk storage tanks.

**Sputum**………………………………………… Phlegm or mucous coughed up from the airways or lungs.

**SQG**……………………………………………..Small quantity Generator of hazardous materials.

**Stability**…………………………………………Resistance to becoming more hazardous.

**STEL**……………………………………………. Short Term Exposure Limit.

**STC**………………………………………………Single Trip Container.

**Stupor**………………………………………….. Severe depression of level of consciousness almost to the point of unconsciousness.

**Subacute Toxicity**……………………………. Adverse health effects resulting from exposure to a chemical for weeks or several months.

**Superficial Burn**………………………………First-degree bum affecting the top layers of skin (epidermis) and characterized by redness and irritation or pain.

**Superfund**……………………………………... The trust fund established under CERCLA to provide revenue and training resources for hazardous waste-site clean up activities.

**Supplied-air suit**………………………………A one or two piece suit that Is impermeable to most particulate and gaseous contaminants and Is provided with an adequate supply of respirable air.

**Surface Area**………………………………….. The area of a material's surface exposed to air.

**Susceptibility**…………………………………. An Individuals sensitivity to a hazardous substance's effects (see also Individual Susceptibility).

**Syncope**……………………………………….. Fainting; an episode of temporary unconsciousness.

**Synergism**……………………………………...The combined action of two or more chemicals which increases individual substances toxicities.

**Systemic Toxicity**…………………………….Toxicity resulting from absorption of a chemical substance into the body, and acting somewhere other than the point of entry .

**Tachycardia**…………………………………… Fast heartbeat (over 100 beats per minute).

**Tachypnea**…………………………………….. Fast breathing rate.

**Target Organ**…………………………………..The organ where a chemical exerts its toxic effects.

**TCLP**…………………………………………….Toxicity Characteristic Leaching Procedure, shows the waste meets the EPA treatment standards.

**Tenderness**…………………………………….Pain with pressure on the tender spot.

**Teratogen**………………………………………A substance that can adversely affect fetal development.

**Thermal**…………………………………………Pertaining to heat.

**Thermal Burn**………………………………….A heat-caused burn.

**Threshold Limit Value (TLV)**………………..An exposure level under which it is assumed that most people can work consistently for 8 hours a day, day after day, with no harmful effects. A table of these values of accompanying precautions Is published ... annually by the American Conference of Governmental Industrial Hygienists.

**Tinnitus**…………………………………………Ringing in the ears.

**Title III**………………………………………….. The Emergency Planning and Community Right- To-Know Acts of 1986. Specifies requirements for organizing the planning process a the State and local levels for extremely hazardous substances: minimum plan content: requirements for fixed facility owners and operators to inform officials about extremely hazardous substances present at the facilities; and mechanisms for making information about extremely hazardous substances available to citizens.

**Toxic**…………………………………………….Poisonous; having properties of causing adverse health effects when the body is exposed.

**Toxicity**…………………………………………The inherent capacity of a substance to cause harm or to produce Injury.

**Toxicology**…………………………………….. The scientific discipline devoted to the study of poisons.

**Toxic Agent**…………………………………… An agent capable of producing a harmful response in a biological system which can lead to serious injury, dysfunction or death.

**Toxic Response**……………………………….An effect considered to be harmful to the biological system as a result of exposure to chemical or physical agents.

**Toxic Products of Combustion**…………….The by-products of a combustion reaction that endanger life or the environment (e.g., carbon monoxide, hydrogen cyanide, hydrogen sulfide. sulfur dioxide, hydrochloric acid, nitrogen oxides).

**Trachea**………………………………………… Windpipe.

**TSCA**…………………………………………….Toxic Substances Control Act.

**TWA**…………………………………………….. (Time Weighted Average) -Average of several sample; taken over time during a normal work day.

**Ulcer or Ulceration**……………………………Loss or death of tissue resulting in an open sore on the skin or on a surface of an internal organ, such as the stomach.

**Unstable Material**…………………………….. Any material that will readily decompose or polymerize due to heat, temperature, pressure or contaminants.

**Urticaria**………………………………………..Hives caused by s systemic allergic reaction.

**UST**……………………………………………...Underground Storage Tank, regulated by RCRA, used to store hazardous chemicals or petroleum.

**Vapors**…………………………………………. The gaseous form of substances which are normal ( in the solid or liquid state either by increasing the pressure or decreasing the temperature alone. Vapors also diffuse. Evaporation is the process by which a liquid Is changed into the vapor state and mixes with the surrounding air.

**Vapor Density**………………………………… The weight of a gas compared to an equal amount of air. Gases with a vapor density greater than (1) will settle; those less than (1 ) will rise.

**Vapor Pressure**………………………………. The pressure of vapor above a liquid.

**Vascular**……………………………………….. Relating to the blood vessels (arteries. veins, or capillaries).

**Ventilation**…………………………………….. One of the principal methods to control health hazards, a duct and fan system which removes airborne contaminants from the workplace.

**Vertigo**…………………………………………. A type of dizziness in which the room feels like it is spinning.

**Vesicant**……………………………………….. A chemical which causes a blistering rash.

**Vesiculation**……………………………………Blistering of the skin.

ViscosIty………………………………………. A fluid’s thickness.

**VOA**…………………………………………….. Volatile Organic Analysis.

**VOC**…………………………………………….. Volatile Organic Compounds.

**Volatile**…………………………………………. Evaporates readily.

**Warning Properties**………………………….. Odor or Irritation signaling the presence of a chemical at airborne concentration below those which are considered toxic.

**Water Reactive Materials**…………………… Any 5,ubstance that readily reacts with or decomposes in the presence of water with substantial energy release.

**WBC**……………………………………………. See White Blood Cell.

**Wheezing**………………………………………Breathing that sounds somewhat like bagpipes due to airway constriction: shortness of breath may be associated with wheezing; commonly occurs in asthma.

**White Blood Cell (W8C)**……………………...Blood cells that look whit under the microscope and function to fight infection.

**WSO** ……………………………………………Wor1d Safety Organization. 26

1. For purposes of this Integrated Plan, HP Hood will report if a release equals or exceeds the RQ adopted under the most current edition of the code of Federal Regulations. [↑](#footnote-ref-1)
2. RQs are listed on the Table found at 40 C.F.R. §§ 302.4 and 355 App. A. [↑](#footnote-ref-2)
3. HP Hood defines ‘immediately’ to mean within one hour of becoming aware of the exceedance, unless reporting within this time frame would compromise the response effort. If the response effort would be compromised, HP Hood will report as soon as practicable. [↑](#footnote-ref-3)
4. HP Hood interprets “immediately” to mean within 60 minutes. HP Hood will always report incidents within 60 minutes of becoming aware of a reportable release, unless reporting in this time frame will compromise the response effort. If a response effort will be compromised, the release will be reported as soon as possible. [↑](#footnote-ref-4)
5. OSHA defines a "hazardous chemical" as any chemical that poses a physical or health hazard. 29 C.F.R. §  1910.1200(c). [↑](#footnote-ref-5)