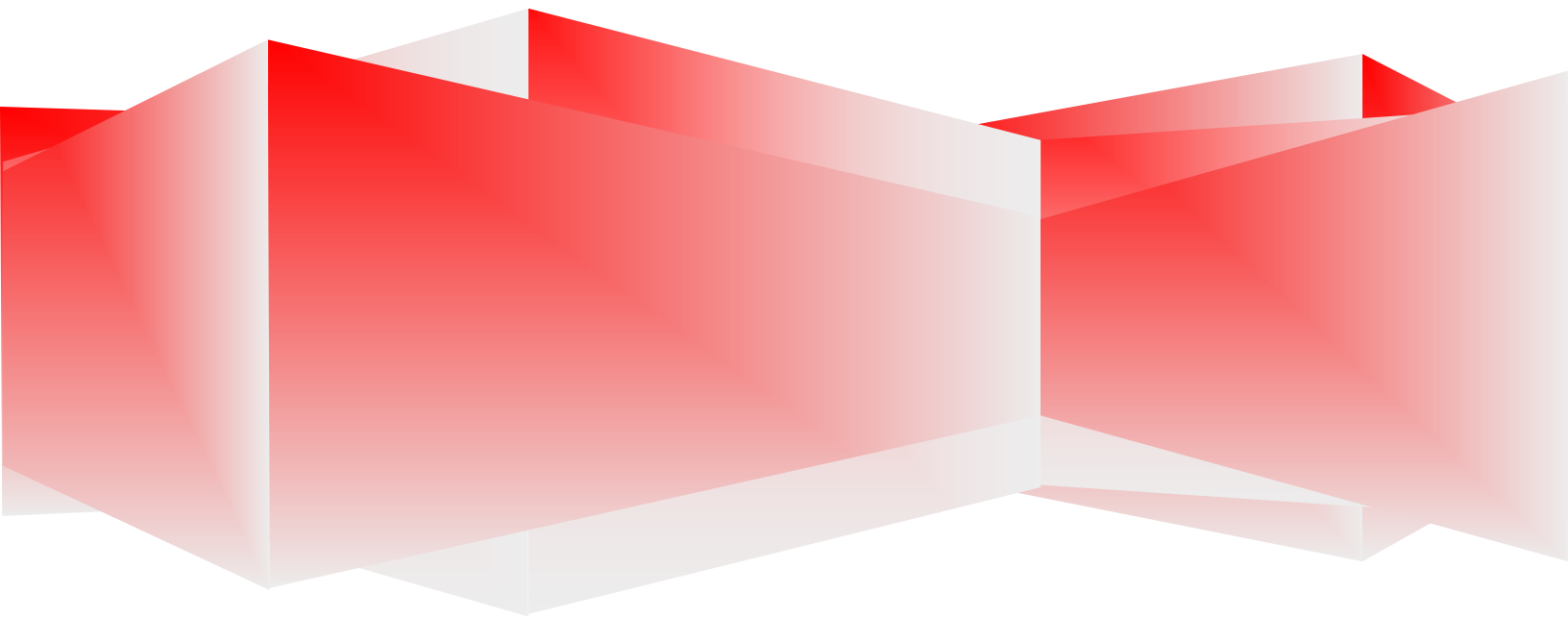


Syracuse Haulers Waste Removal, Inc.

**Emergency
Response
Plan (ERP)**

**For
Syracuse Haulers Transfer Facility
6223 Thompson Road
Syracuse, NY 13206**

September 2024



EMERGENCY RESPONSE PLAN (ERP)

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EMERGENCY RESPONSE PLAN (ERP)

1. OVERVIEW

This Emergency Response Plan (ERP) has been created so that Syracuse Haulers Waste Removal, Inc. (SH) staff can properly and thoroughly respond to **Hazardous Materials Release, Fire/Explosion, Radiation Detection, Emergency Notification, and Bloodborne Pathogen Exposure**, at the Syracuse Haulers Waste Removal, Inc. Transfer Facility, 6223 Thompson Road, Syracuse, NY 13206. On the following pages are decision trees (process flow diagrams) and detailed procedures for responding to such emergencies.

Modification of the following action plans can occur during the emergency, if the Emergency Coordinator or his/her Alternate determines that a different action will result in a better response to the emergency.

NOTE: Medical Emergencies, involving personal injury, heart attacks, unconsciousness, etc., vary in their complexity and nature. As a result, medical contingency plans are NOT included in this document. Instead, both the Emergency Coordinator (EC) and the Alternate are certified to provide First Aid and CPR, should the need arise. The EC will contact medical emergency response professionals, as is warranted by the situation.

1.1. Discovery

The Emergency Coordinator (and the Alternate) are responsible for determining the proper response to an emergency, in accordance with SH control procedures. If an SH employee discovers a spill, fire, or other emergency, that person must immediately contact the following individuals, in the designated order, until communication is achieved with one of the individuals:

1. **Emergency Coordinator (Scott Reed: 315.396.6814)**
2. **Alternate (Lynn Heffron: 315.729.9622)**
3. **Front Office (Steve Ruge: 315.706.6933)**

If not present at the incident scene, the Emergency Coordinator (or Alternate) can be contacted through mobile phones. Steve Ruge can be contacted by dialing extension 213 on any of the in-facility phones, after first pressing one the "INT" line buttons on a company telephone set. *(Phone numbers appear immediately above and in the tabbed section, "Emergency Contacts.")*

The employee, who discovers the situation, should provide to the Emergency Coordinator, Alternate and/or the Front Office the following information:

- Nature of emergency (i.e. Fire, Explosion, Hazardous Spill, Biohazard and/or Medical)
- Location of emergency
- Size and extent of emergency
- Materials involved, and
- Injury to personnel/civilians

EMERGENCY RESPONSE PLAN (ERP)

1.2. Initial Response

Upon being notified, the Emergency Coordinator (and/or Alternate) will assess the situation to determine the following:

- Hazards involved
- Magnitude of the problem
- Resources threatened, and
- Exclusion zone needed or evacuation of facility required

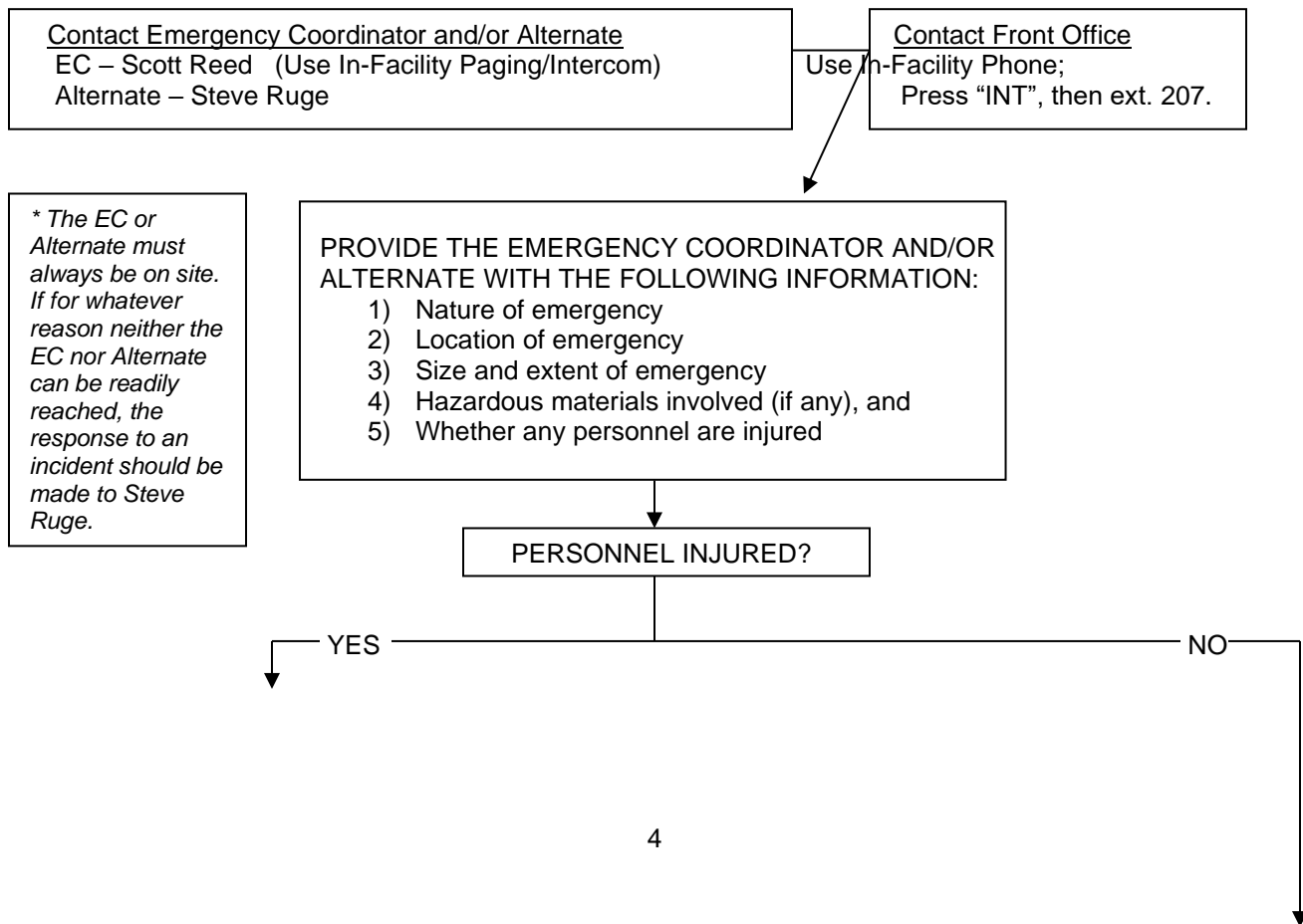
If the emergency involves the incidental release of a hazardous material, while awaiting arrival of the Emergency Coordinator (EC) or his/her Alternate, facility personnel shall commence containment activities immediately, using all available trained manpower and materials on-hand.

All containment activities are to be conducted at a safe distance from the release area and will consist of only those activities described in each employee's "Hazwoper" Training / "Spill Prevention Control & Countermeasures (SPCC)" Training.

Immediate containment of the spill shall include blocking of adjacent drains, constructing dikes, etc., while using all available containment materials on-hand.

2. HAZARDOUS MATERIALS

2.1. Spill and/or Release - (Procedural Flow)



EMERGENCY RESPONSE PLAN (ERP)

EMERGENCY COORDINATOR OR ALTERNATE CONTACTS THE FOLLOWING:
AMBULANCE: CALL "911" BE PREPARED TO GIVE:
NAME, ADDRESS, EXTENT OF INJURIES, EXTENT
OF EMERGENCY, POSSIBLE CHEMICALS INVOLVED AND QUANTITY.

(Continued from Previous Page)

EMERGENCY COORDINATOR AND/OR ALTERNATE WILL ASSESS THE SITUATION TO DETERMINE:

- 1) Hazards involved
- 2) Magnitude of the problem
- 3) Resources threatened, and
- 4) Exclusion Zone needed or Evacuation of Facility required

IN THE CASE OF A FIRE (EXCLUDING INCIPIENT FIRES), THE EMERGENCY COORDINATOR OR ALTERNATE CONTACTS THE FOLLOWING:

FIRE DEPARTMENT: CALL "911"

BE PREPARED TO GIVE: NAME, ADDRESS, EXTENT OF INJURIES, EXTENT OF EMERGENCY, POSSIBLE CHEMICALS INVOLVED AND QUANTITY

IF NECESSARY, THE EMERGENCY COORDINATOR WILL NOTIFY ALL FACILITY PERSONNEL OF EVACUATION THROUGH THE IN-FACILITY PAGING/LOUD SPEAKER SYSTEM. OFFICE PERSONNEL WILL BE NOTIFIED BY PHONE.

CAN THE SPILL BE ABSORBED, NEUTRALIZED, OR OTHERWISE CONTROLLED AT THE TIME OF RELEASE BY EMPLOYEES IN THE IMMEDIATE RELEASE AREA WITHOUT POSING A SAFETY OR HEALTH HAZARD?

YES

NO

CONTAIN SPILL; CLEAN-UP SPILLED MATERIAL, STORE PROPERLY FOR DISPOSAL (SEE PAGE 6)

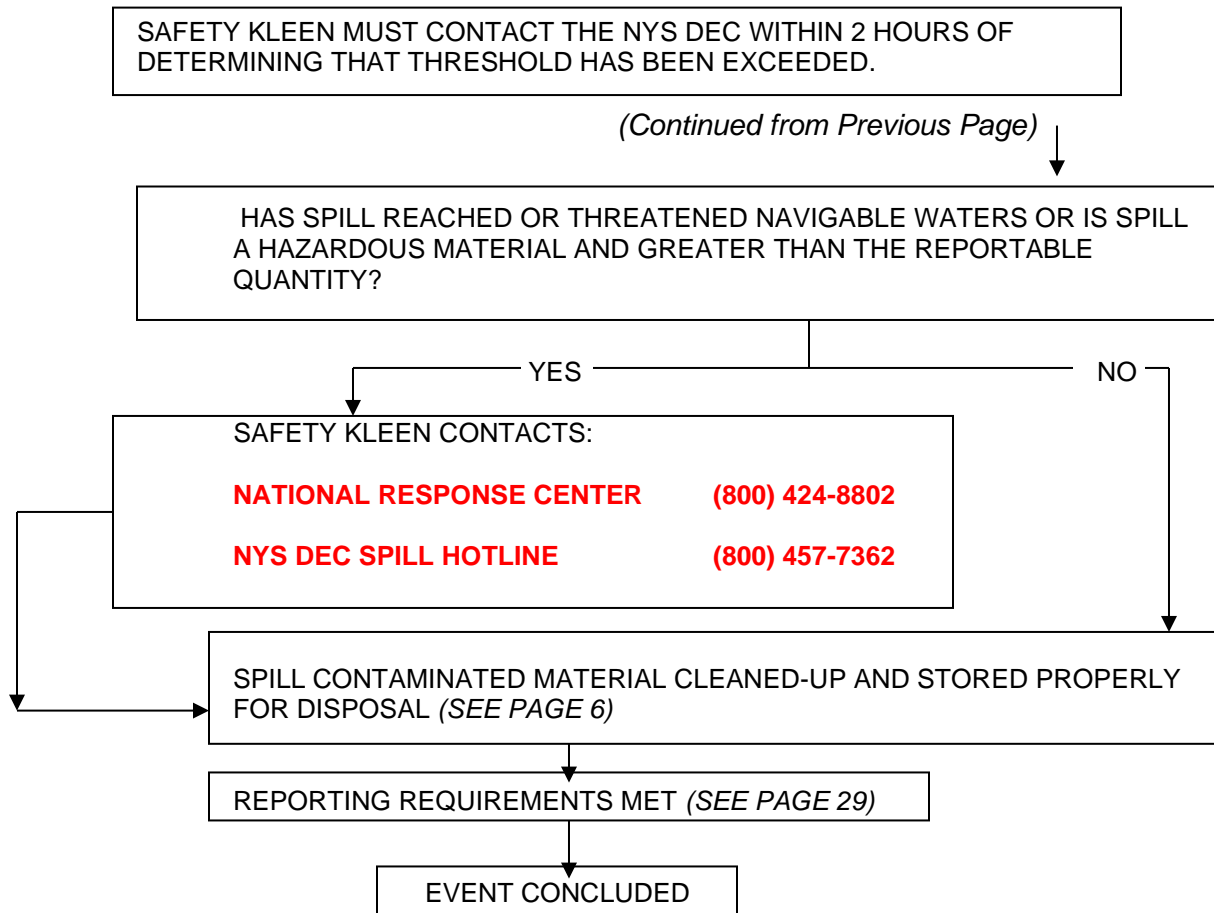
EC / ALTERNATE CONTACTS:
SAFETY KLEEN
(888) 375-5336

HAS OR WILL THE SPILL BE RELEASED TO THE ENVIRONMENT IN QUANTITIES ABOVE ITS REPORTABLE QUANTITY, CAUSE A SHEEN ON A SURFACE WATER, OR POSE AN IMMINENT HAZARD (SEE PAGE 6)

YES

NO

EMERGENCY RESPONSE PLAN (ERP)



2.2. Immediate Emergency Actions for Spills

Emergency procedures are the responsibility of the Emergency Coordinator (and/or the Alternate) but not the general employees of SH. Immediate procedures are outlined below:

- The Emergency Coordinator (and/or Alternator) must identify the character, exact source, amount, and extent of any released materials and assess possible hazards to human health or the environment.
- If necessary, the Emergency Coordinator (and/or Alternator) will evacuate all personnel within the facility using predetermined routes. (See page 19, "Evacuation Plan", for details.)
 - Transfer Facility personnel will be notified by an air horn and the in-facility phone system/paging system.
 - If the Emergency Coordinator determines there is a threat to human health or to the environment outside the facility, then he must report his findings immediately:

Call "911" and Safety Kleen (888) 375-5336

EMERGENCY RESPONSE PLAN (ERP)

- Local authorities, especially if evacuation of local areas is advisable, are to be contacted by calling “911.”

EMERGENCY RESPONSE PLAN (ERP)

- If the Emergency Response Contractor, Safety Kleen, determines that the spill is of a reportable quantity or greater, they must make their findings known immediately:

- **NYS DEC Spill Hotline.....(800) 457-7362**
- **National Response Center.....(800) 424-8802**

The following information must be provided to the regulatory agencies when contacted:

- Name and telephone number of reporter
 - Name and address of facility
 - Time and type of incident (e.g. release, fire)
 - Name and quantity of material(s) involved, to the extent known
 - The possible hazards to human health or the environment outside the facility
- As necessary, the Emergency Response Contractor (Safety Kleen) should notify the appropriate State and local regulatory agencies, included under the “Emergency Contacts” tabbed section.

2.3. During a Hazardous Spill Emergency

For all spills or leaks, the following guidelines will be followed as closely as possible by individuals appropriately trained, and as previous designated by the Emergency Coordinator or Alternate.

- If a leak or spill of oil or hazardous materials develops, the person discovering the discharge will leave the immediate area and contact... in this order: 1) the Emergency Coordinator, 2) Alternate and 3) Steve Ruge, providing the following information, to their fullest extent known:
 - Person(s) injured and seriousness of injury
 - Location of the spill or leak, material involved, and source
 - The approximate amount spilled, an estimate of the liquid and/or gas discharge rate, and the direction the liquid flow or gaseous cloud is moving
 - Whether the spill has been contained, or whether the flow has stopped
 - Whether a fire is involved
- The Emergency Coordinator or Alternate will contact the **Ambulance (call “911”)** and **University Hospital, 315.464.8633**, if personnel are injured. Only then, will the Emergency Coordinator or Alternate assess the situation to determine the following:
 - Hazards involved
 - Magnitude of the problem
 - Resources threatened
 - Exclusion Zone needed or evacuation of facility required

EMERGENCY RESPONSE PLAN (ERP)

- If the spill is small enough to be absorbed, neutralized or otherwise contained at the time of release by employees in the immediate release area, and it does not pose an adverse exposure hazard to employees, and it is within the scope of the employee's Hazwoper Training and/or SPCC Training, then the spill will be handled in the following manner:
 - Make sure all unnecessary persons are removed from the hazard area.
 - If flammable material is involved, remove all ignition sources, and use spark and explosion proof equipment and clothing in containment and clean up.
 - If possible, try to stop the leak.
 - Remove all surrounding materials that could be especially reactive with the materials in the waste. Determine the major components at the time of the spill.
 - Use absorbent pads, booms, earth, sandbags, sand, and other inert materials to contain, divert, neutralize and clean up a spill if it has not been contained by a dike or sump. Most spills contained within a dike or sump can be pumped back into the appropriate storage tank or drum.
 - If the released material is flammable, make sure that all electrical/mechanical equipment used in the response is explosion proof.
 - Procedure to follow for a leaking drum:
 - Move drum into a containment area or construct containment area around the drum
 - Roll drum or stand up on its end, away from leak
 - Drain contents (transfer to clean drum)
 - Label both drums accordingly
 - Absorb spillage or leakage with absorbent materials
 - Transfer absorbent waste to drum, label accordingly
 - Store until final disposal, and
 - Contact Safety Kleen for disposal
 - If spilled materials are flowing off-site, try to stop flow from the source by using sand, earth, sandbags, etc. If this is done, pump this material into a temporary holding tank or drum as soon as possible. If the released material is flammable, make sure that all electrical/mechanical equipment used in the response is explosion proof.
 - Place all containment and clean-up materials in drums for proper disposal. Some items, such as absorbent rags or booms, may have to be cut up.
 - Place all recovered liquid wastes in drums for removal to an approved disposal site.
- For large and/or hazardous spills the Emergency Coordinator and Alternate will use the following procedure:
 - Steve Ruge and facility receptionist will be called and instructed to turn on the answering machine and to not accept any outside calls unless absolutely necessary, so that the phone lines remain free to handle only emergency calls.
 - Initiate evacuation of the facility as necessary. (See page 19, "Evacuation Plan" for details.)

EMERGENCY RESPONSE PLAN (ERP)

- Call the ambulance service (911) for any injured persons. (Note: Both the Emergency Coordinator and Alternate are certified in First Aid and CPR, if basic medical attention is required.)
- Call the fire department (dial “911”) if a fire is involved.
- Keep heat-exposed containers cooled with water spray and remove them from the area if possible.

NOTE: If a hissing sound comes from a venting device or if a drum begins to bulge or discolor, withdraw all people from the area -- immediately.

- **Contact Safety Kleen at (888) 375-5336 for emergency spill response.**
- Safety Kleen, the designated emergency spill responder, is responsible for reporting the spill or release to local and state authorities so that, if necessary, downstream water users and/or persons downwind of the vapor can be notified and, if necessary, evacuated and/or sheltered.
- **SH personnel will NOT assist in handling hazardous materials spills, except minor spills which present no risk to facility personnel and are within the scope of their Hazwoper and/or SPCC Training.** For all other spills of hazardous materials, the Emergency Coordinator will contact Safety Kleen.
- All emergency equipment, which is used in response to the emergency, will be returned to “ready status” prior to resumption of facility operations in the affected area. During the emergency, the Emergency Coordinator should be aware of the following possible problems:
 - If the facility stops operations in response to a fire, explosion, or release, the Emergency Coordinator must monitor for leaks, pressure build up, gas generation, or ruptures in valves, pipes or other equipment, as appropriate.
 - In the affected areas of the facility, any waste or other materials that may be incompatible with the released material should be treated, stored, or disposed of... only after cleanup procedures are completed.
- The Emergency Coordinator will document the incident within 15 days and begin an investigation of the incident and the effectiveness of the emergency procedures. (See “Incident Report” in this document for details.)

EMERGENCY RESPONSE PLAN (ERP)

2.4. Extended Down Time of Transfer Facility

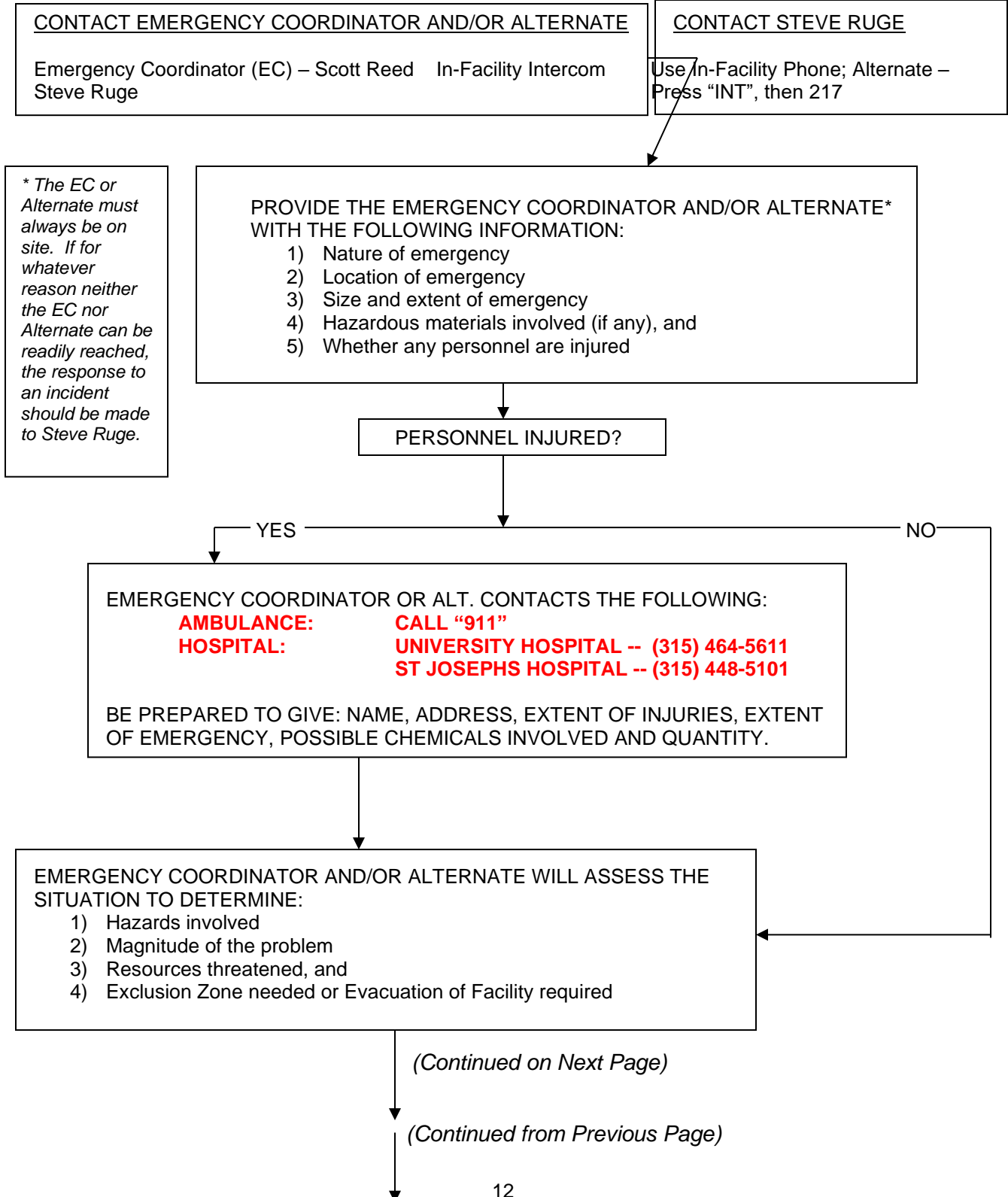
In the event of a major event that prohibits the use of the Transfer Facility, the following procedures are enacted:

- In the event of a major breakdown, SH will cease all incoming loads and redirect all vehicles to the appropriate disposal sites (*See list of "Disposal Sites" in the "Appendix"> "Disposal Sites".*)
- In the event of extended down time (hazardous spill, fire, etc.) all incoming company vehicles will be sent directly to the appropriate disposal site. Any contracted customer will be notified immediately via phone, fax, 2-way radio, and/or email of the shut-down with a list of disposal sites. (*See list of "Disposal Sites" in the "Appendix"> "Disposal Sites".*)

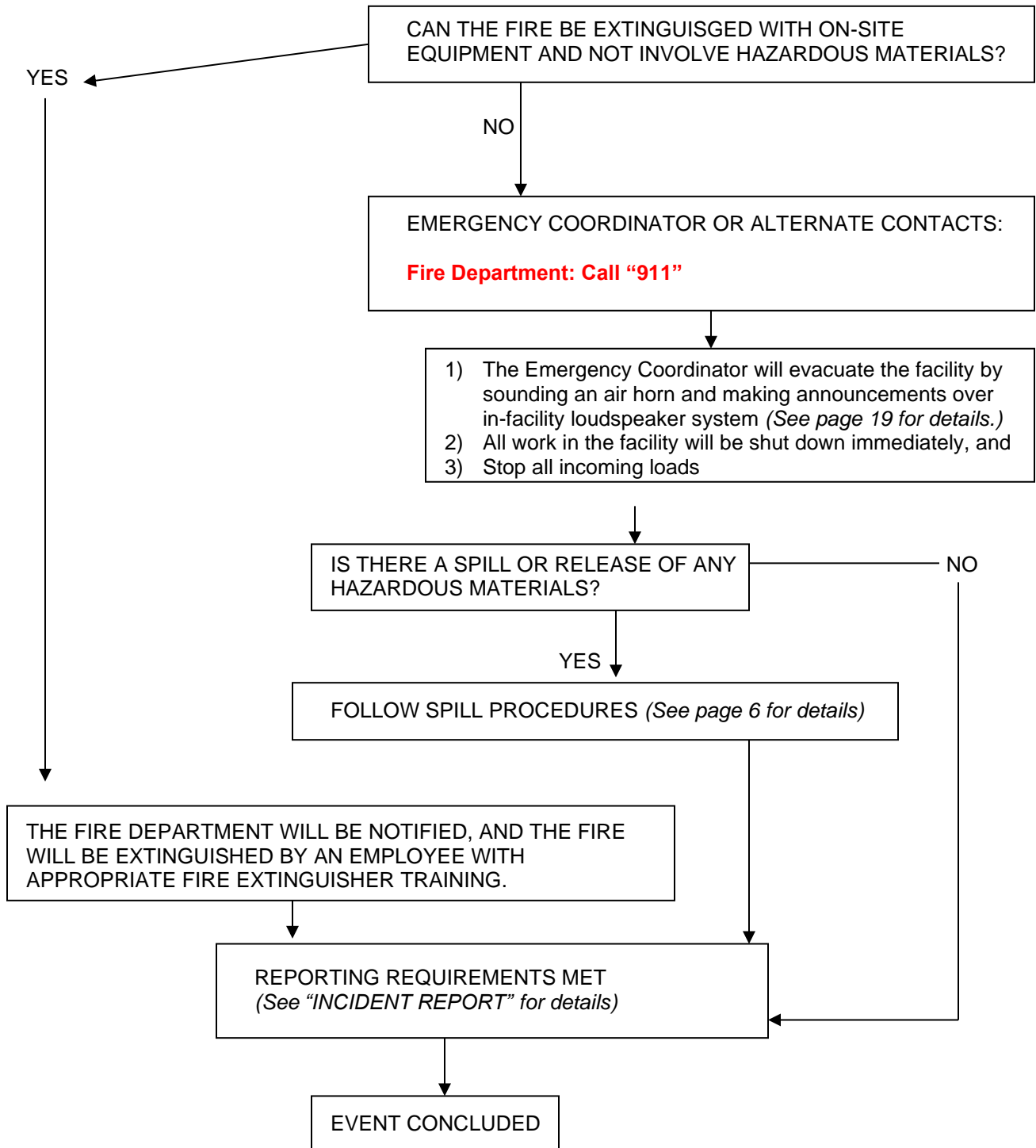
EMERGENCY RESPONSE PLAN (ERP)

3. FIRE AND/OR EXPLOSION

3.1. Response to Fire and/or Explosion (Procedural Flow)



EMERGENCY RESPONSE PLAN (ERP)



EMERGENCY RESPONSE PLAN (ERP)

3.2. Precautionary Measures for Fires

The following precaution measures are in place at the SH Transfer Facility in order to minimize the spread of fire:

- ABC rated, 20 lb. fire extinguishers are strategically placed within the facility, on the building's support columns, and are designated by identifying labels and covers. (See *Evacuation Map – Interior in Section 5.3.2*)
- Designated facility personnel are trained and are retrained, at least annually, on how to properly use fire extinguishers.
- All employees are trained in proper reporting and evacuation procedures.
- Emergency 911 service is also available from all telephones.

3.3. Immediate Actions for Fires

The person discovering the fire will leave the immediate area and contact, in the following order, until an individual is reached... 1) the Emergency Coordinator, 2) the Alternate and 3) Steve Ruge, so as to provide the following information:

- Nature of the emergency
- Location of the emergency
- Size and extent of the emergency
- Hazardous materials involved (if any)
- Person(s) injured and seriousness of injury
- The Emergency Coordinator (and/or Alternate) will contact the ambulance and hospital if personnel/civilians are injured and then assess the situation to determine the following:
 - Hazards involved
 - Magnitude of the problem (specifically, whether the fire is significant)
 - Resources threatened
 - Exclusion Zone needed or evacuation of facility required

Note: The first priority for an employee discovering a fire should be to notify the Emergency Coordinator, so that the chain of command is aware of the situation and so that the fire department can be contacted, if needed.

EMERGENCY RESPONSE PLAN (ERP)

3.4. During a Fire

3.4.1. For Small, Contained Fires

If the fire is small and contained (incipient) and does not involve hazardous materials:

- The fire department will be notified.
- At the same time, employees with fire extinguisher training will put out the fire.
- The Emergency Coordinator will determine whether the building should be evacuated for smoke build-up.
- The Emergency Coordinator will investigate for any injuries or damage to the building.
- The Emergency Coordinator will document the incident within 15 days and begin an investigation of the incident and the effectiveness of the emergency procedures (See *"Incident Report" in this document for details*).

3.4.2. For Large or Un-Contained Fires

If the fire is determined to be significant or cannot be contained or is believed to involve hazardous materials:

- The first person seeing the fire will alert -- in the following order until contact is successful -- the Emergency Coordinator, the Alternate, and Steve Ruge. This can be done through mobile phones. (See *tabbed section, "Emergency."*)
- Next, the notifying individual is to follow the direction of the Emergency Coordinator and notify staff to evacuate the facility, through the use of the in-facility intercom/paging system and/or air horn.
- Upon hearing the emergency notice, all facility personnel will evacuate the facility and proceed immediately to the designated Emergency Assembly Area. (See *"Evacuation Plan – Exterior" below*.)
- Meanwhile, the EC, Alternate, or Steve Ruge will notify the fire department by dialing "911", in order to give the emergency center the name and address of the facility and the nature of the call (fire).
- All equipment will be shut down as necessary and practical.
- SH employees will exit the nearest emergency exit and report to the Emergency Assembly Area. If the location of the fire blocks an emergency exit, then the employee will proceed to the nearest emergency exit away from the fire. (See *"Evacuation Plan - Interior" below for details*.)
- Contract personnel or visitors are the responsibility of SH and must evacuate to the Emergency Assembly Area for accountability.

EMERGENCY RESPONSE PLAN (ERP)

- The employee recognizing the emergency situation and beginning the evacuation will locate the Emergency Coordinator (at the Emergency Assembly Area), providing further information about the location and type of fire (oil, paper, etc.)
- The Emergency Coordinator will account for all employees. Names of persons present will be taken to assist the Emergency Coordinator in determining the presence of all employees. The Emergency Coordinator will report any missing employees to the first authorized emergency responders on site.
- Upon arrival of the fire department, the Emergency Coordinator and employee discovering the fire will report the location and type of fire and any missing employees.
- No employee is to speak to the media or share any information of any kind, under any circumstances to anyone; only the owner is authorized to speak.
- After the incident is complete, the Emergency Coordinator and person locating the fire will document the incident. (See *"Incident Report" in this document for details*).
- All emergency equipment used in the emergency will be returned to ready status prior to resumption of facility operations in the affected area. During the emergency, the Emergency Coordinator should be aware of the following possible problems:
 - If the facility stops operations in response to a fire, explosion, or release, the Emergency Coordinator must monitor for leaks, pressure build up, gas generation, or ruptures in valves, pipes or other equipment, as appropriate.
 - In the affected areas of the facility, any waste or other materials that may be incompatible with the released material should be treated, stored, or disposed of... only after cleanup procedures are completed.
- The Emergency Coordinator will document the incident within 15 days and begin an investigation of the incident and the effectiveness of the emergency procedures. (See *"Incident Report" in this document for details*).

3.5. Extended Down Time of Transfer Facility

In the event of a major event that prohibits the use of the Transfer Facility, the following procedures are enacted:

- In the event of a major breakdown, SH will cease all incoming loads and redirect all vehicles to the appropriate disposal sites (See *"Appendix"> "Disposal Sites"*).
- In the event of extended down time (hazardous spill, fire, etc.) all incoming company vehicles will be sent directly to the appropriate disposal site. Any contracted customer will be notified immediately via phone, fax, 2-way radio, and/or email of the shut-down with a list of disposal sites.

EMERGENCY RESPONSE PLAN (ERP)

4. RADIOACTIVE WASTE DETECTION

The nature of a Radiation Detection incident is different in form and substance than a Hazardous Materials Spill or a Fire/Explosion emergency. Therefore, the format and organization of this section of the ERP will appear different to you.

4.1. Detection Protocol

Syracuse Haulers' objective is to identify radiation contamination in any and all materials that may enter the facility. The firm lacks the expertise to remediate contaminated materials, therefore the protocol focuses on identification, return of materials to its originator, and reporting of incidents to the authorities (DEC), who are best equipped to investigate and follow-up.

The following procedures are in effect:

- A radiation detector is integrated within the Syracuse Hauler's truck scale, over which all incoming loads to the Transfer Facility must pass. (See "Appendix">"TRUCK SCALE & RADIATION DETECTION" for more details.) A detection alarm sounds if a truck containing radioactive materials passes over it. Should the alarm sound, the truck driver is instructed to drive off the scale platform and to stop at the base of the scale. No other truck traffic can enter the scale until the truck is released. Next the radiation detection unit is reset and the truck drives back on the scale to check for a false positive. If radiation is still detected the truck again drives off the scale platform and stops.
- Once the truck is stopped in the designated location, the driver is instructed to exit the truck and to walk onto the scale, in order to determine if the driver is the source of the radiation. (The driver could be the source of radiation, as some medical procedures involve the use of radioactive isotopes, and these may linger in human tissue for days after a procedure is performed.)
- If it is determined that the driver is, indeed, a source of radiation, then another driver is enlisted to drive the truck back over the scale (and pass through its radiation detection unit), in order to rule out any other radiation contamination within the load. If none is present, the truck can immediately proceed to the unloading area of the Transfer Facility, with the original driver in the seat.
- If the material on the truck is found to be the source of the radiation, radiation readings will be recorded at the cab and for the load itself. The truck will then be directed to a parking location away from the scale. The EC will verify critical information with the driver and record it on the "Radiation Monitor Alarm Notification Report". (See form below.) After the form is completed in full, the EC immediately informs the DEC by emailing the form to the DEC at Rad.sp11406@dec.ny.gov
- If it is a Syracuse Haulers truck, the truck will be stored at the parking location for 48 hours and then retested, as the source of the radiation may be medical waste with a very short half-life. If the truck is not a Syracuse Haulers truck or if radiation is still detected after the waiting period, the truck will be returned to its originator as long as the radiation levels are below the allowable limits for transport – 2 mrem/hr for the cab and 50 mrem/hr for the load itself. If the radiation levels are above the allowable limits the DEC

EMERGENCY RESPONSE PLAN (ERP)

should contact Syracuse Haulers with further instructions. If no response is received Thomas Papura can be contacted at thomas.papura@dec.ny.gov , 518-402-8652.

- A US Department of Transportation special permit is required to transport the materials back to the originator. Part 1 of a “DOT-SP 11406 Shipment Approval Form” for a waste load or “DOT SP 10656 Shipment Approval Form” for a scrap metal load is completed. The DOT SP11406 form is emailed to the DEC at @Rad.sp11406@dec.ny.org. The DOT 10656 form is emailed to BERP@health.ny.gov Attn: Radioactive Material Scrapyard Alert (See “Appendix for DOT SP 11406 and DOT SP 10656 forms”). The agency must issue a special permit for transportation of the contaminated materials, before the radioactive load can leave the Transfer Facility. A flow chart is given in Section 4.3 below. The driver then returns the contaminated load to its originator following the DOT procedure.
- If the radiation is above allowable limits for use of the DOT SP11406 or SP10656 forms, it may be necessary to contact a NYSDOH licensed consultant for assistance. A list of the currently licensed consultants is given in Section 4.4 below.

4.2. Radiation Detected Incident Report

EMERGENCY RESPONSE PLAN (ERP)

Syracuse Haulers Waste Removal, Inc.
6223 Thompson Road Suite 1000
Syracuse, New York 13206
Phone - 315-426-6771 Fax - 315-426-6771

Radiation Monitor Alarm Notification Report

Identification information

Date/Time Received : _____
Hauler : _____
Origin of Waste : _____
MMF Truck Number : _____
Truck License Plate Number : _____
Box Number: _____
Waste Description : _____
Contact Person : _____
Phone : _____
Email: _____

Portal Monitor Alarm information:

Background detector 1: _____

Max/Alarm detector 1: _____

Check for using SP11406 or SP10656

Background: _____
Dose Rate in Load: _____
Dose Rate in Cab: _____

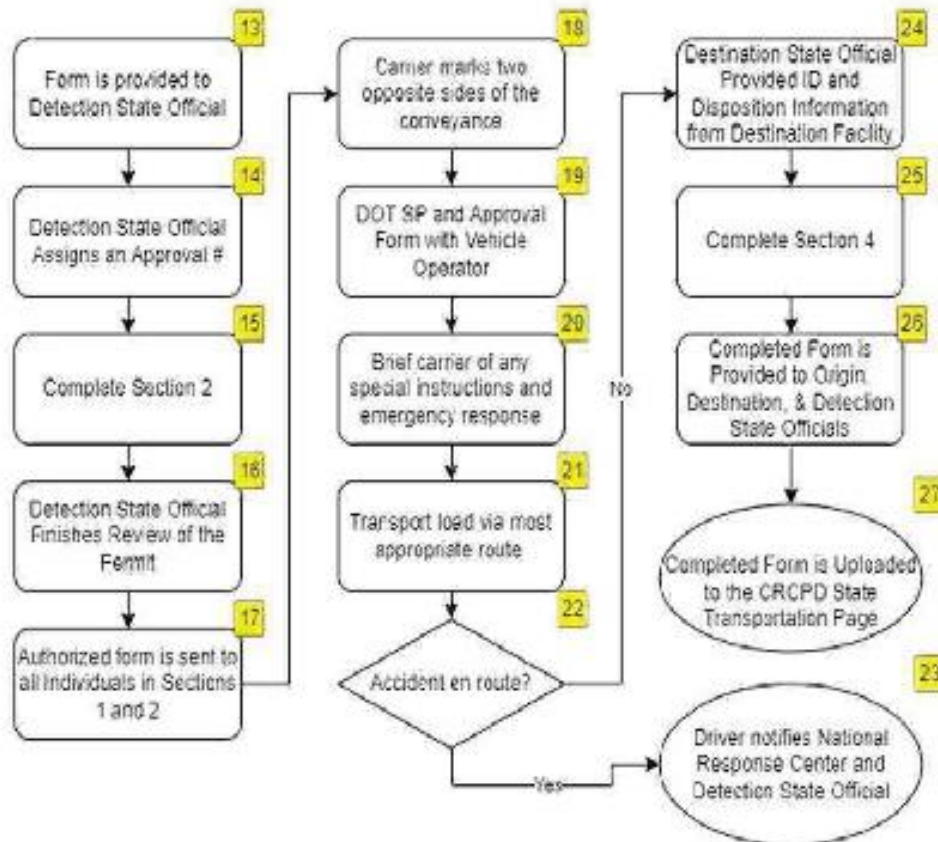
Spectra Information Submitted:(File ID)

Tentative ID of Material: _____
Source Check: _____
Background: _____
Unknown: _____

EMERGENCY RESPONSE PLAN (ERP)

4.3. DOT Permit Flow Chart

DOT-SP Process



Flow chart adapted from chart on page 6 of CRCPD Guidance and Best Practices for DOT SP-10656 and SP 11406 Forms Revised in 2023

EMERGENCY RESPONSE PLAN (ERP)

4.4. NYSDOH Licensed Consultants

GREAT LAKES ENVIRONMENTAL & SAFETY CONSULTANTS, INC.

EVAN J CASEY
50 RIDGE ROAD
BUFFALO NY 14218 716-827-0700

MJW TECHNICAL SERVICES, INC.

ALEXANDER BARTELS abartels@mjwcorp.com
15 HAZELWOOD DRIVE, SUITE 112
AMHERST NY 14228 716-631-8291

NORTHSTAR CONTRACTING GROUP, INC.

SCOTT E STATE, P.E.
32 WILLIAMS PARKWAY
EAST HANOVER NJ 07936 412-609-1590

GREATER RADIOLOGICAL DIMENSIONS, INC.

MICHAEL N PAULY michael.pauly@grdny.com
3857 HYDE PARK BLVD.
NIAGARA FALLS NY 14305 716-754-2654

COPHYSICS CORPORATION

THEODORE E RAHON, PH.D. ted@cophysics.com
1 COMMERCIAL DRIVE, SUITE 1
FLORIDA NY 10921 845-783-4402

PERMA-FIX ENVIRONMENTAL SERVICES, INC.

ANDREW J LOMBARDO, CHP andy.lombardo@perma-fix.com
1093 COMMERCE PARK DRIVE, SUITE 300
OAK RIDGE TN37830 865-640-0501

TIDEWATER, INC.

JAMES REESE, CHP, RRPT james.reese@tideh2o.net
6625 SELNICK DRIVE, SUITE A
ELKRIDGE MD 21075 916-717-0529

C.N. ASSOCIATES, INC.

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EMERGENCY RESPONSE PLAN (ERP)

5. EMERGENCY NOTIFICATION

5.1. Internal Notice

In the event of an emergency, the employee discovering the incident will immediately contact the following individual, in order of appearance until contact has been made with someone: 1) the Emergency Coordinator, 2) the Alternate and 3) the Steve Ruge. Both the EC and the Alternate can be contacted over mobile phones.

Steve Ruge can be contacted by using any phone in the facility by pressing the “INT” button and then dialing extension 213:

1. Provide the location and type of emergency
2. Steve Ruge will contact the Emergency Coordinator (and/or Alternate) through a mobile phone

For any emergency, the decision to evacuate will be at the discretion of the Emergency Coordinator or his Alternate. An evacuation notice will be announced through the facility’s telephone/public address system. If an evacuation is determined to be necessary, all facility and office personnel will immediately exit the facility at the established points of egress and meet at the designated Emergency Assembly Area. (*See Interior and Exterior Evacuation Maps on pages 26 and 27 below*)

* Note: The Emergency Coordinator or Alternate must always be on site. If for whatever reason neither the Emergency Coordinator nor Alternate can be readily reached, a report of the incident should be directed to Steve Ruge, where he will telephone “911” to summon emergency response professionals, so as to avoid in delay in response.

5.2. Community Notice

To notify neighboring properties and/or to evacuate an area outside of the facility, the Emergency Coordinator will first contact “911” and will next contact the East Syracuse Fire Department at 315-671-3380. The primary Emergency Responder or East Syracuse Fire Department will be responsible for determining the need for neighborhood evacuation.

Should a decision to evacuate the neighborhood be made, the EC and other responders will telephone area businesses to notify them. (*See “Emergency Business Contacts” on page 29 below.*)

5.2.1. State and Federal Reporting Requirements

A variety of state and federal reporting requirements exist for the reporting of emergencies and chemical releases. Provided below is a description of criteria applicable to Syracuse Haulers Waste Removal Inc. for reporting under various regulations. However, in most cases, the contracted emergency responder, Safety Kleen, will work with the Emergency Coordinator to ensure that all reporting is thorough, correct and timely.

EMERGENCY RESPONSE PLAN (ERP)

o New York State Spill Requirements

If an Oil / Hazardous Material is released, the NYS DEC requires that:

- Immediate containment of the spill shall be initiated such as blocking of adjacent drains, constructing dikes, etc., using all available containment materials on-hand.
- Contained materials shall be removed as soon as possible and placed into proper containers. All equipment and manpower shall be utilized to remove spilled materials promptly and in a safe manner.
- In the event that the spill is beyond the means of available manpower and materials on-hand, the Emergency Coordinator will contact Safety Kleen, which is the contracted clean-up company of SH. *(See the tabbed section “Emergency Contacts” for details or refer to “Appendix”>“EMERGENCY CONTACTS” for details.)*

The following information should be provided to the NYS DEC, to the best of the reporting person’s knowledge, upon oral notification of a spill:

- The name and telephone number of the caller
- The location of the release or threat of release
- The date and time the release occurred
- The set(s) of notification criteria that is the basis for notification
- The name of the oil and / or hazardous material(s) released or of which there is a threat of release
- The approximate quantity of the oil and / or hazardous material(s) which has been released or of which there is a threat of release
- The source of the release or threat of release
- A brief description of the release or threat of release
- The name and telephone number of the owner / operator of the site or vessel where the release has occurred or at which there is a threat of release
- The name and telephone number of a contact person at the site or vessel where the release has occurred or at which there is a threat of release
- A description of Immediate Response Actions taken or proposed to be taken in response to the release or threat of release
- The names of other federal, state or local government agencies that have been notified of and / or have responded to the release or threat of release

EMERGENCY RESPONSE PLAN (ERP)

- If applicable, any other information, including without limitation, potential environmental impacts, that is relevant to assessing the degree of hazard posed by the release or threat of release.

5.3. Response Management System

5.3.1. Overview

All emergencies require prompt and deliberate action. In the event of any major emergency, it will be necessary to follow an established set of procedures. Such established procedures will be followed as closely as possible; however, in any given emergency situation, the Emergency Coordinator and / or Alternate may deviate from the procedures to provide a more effective plan for bringing the situation under control.

SH employees will not engage in emergency response operations other than incipient fires or incidental releases of hazardous materials, as defined in their Fire Extinguisher Training and Hazwoper/SPCC Training, respectively. In the event of an emergency, all SH employees will be evacuated from the facility, and professional, emergency response personnel will be called in. The Emergency Coordinator (and/or Alternate) is responsible for determining which situations require facility evacuation.

The Transfer Facility makes use of an internal telephone/public address system, which can be used to communicate between Steve Ruge and the facility and to outside lines, and it also incorporates a paging/loudspeaker system. The paging/loudspeaker system can be used to contact key facility personnel and to make announcements.

Total facility evacuation is initiated by the Emergency Coordinator. The Emergency Coordinator will initiate evacuation in the facility through the paging/loudspeaker phone system and/or air horn.

5.3.2. Evacuation Plan

In the event that a facility evacuation is called for by the Emergency Coordinator (and/or Alternate), the following actions will be taken:

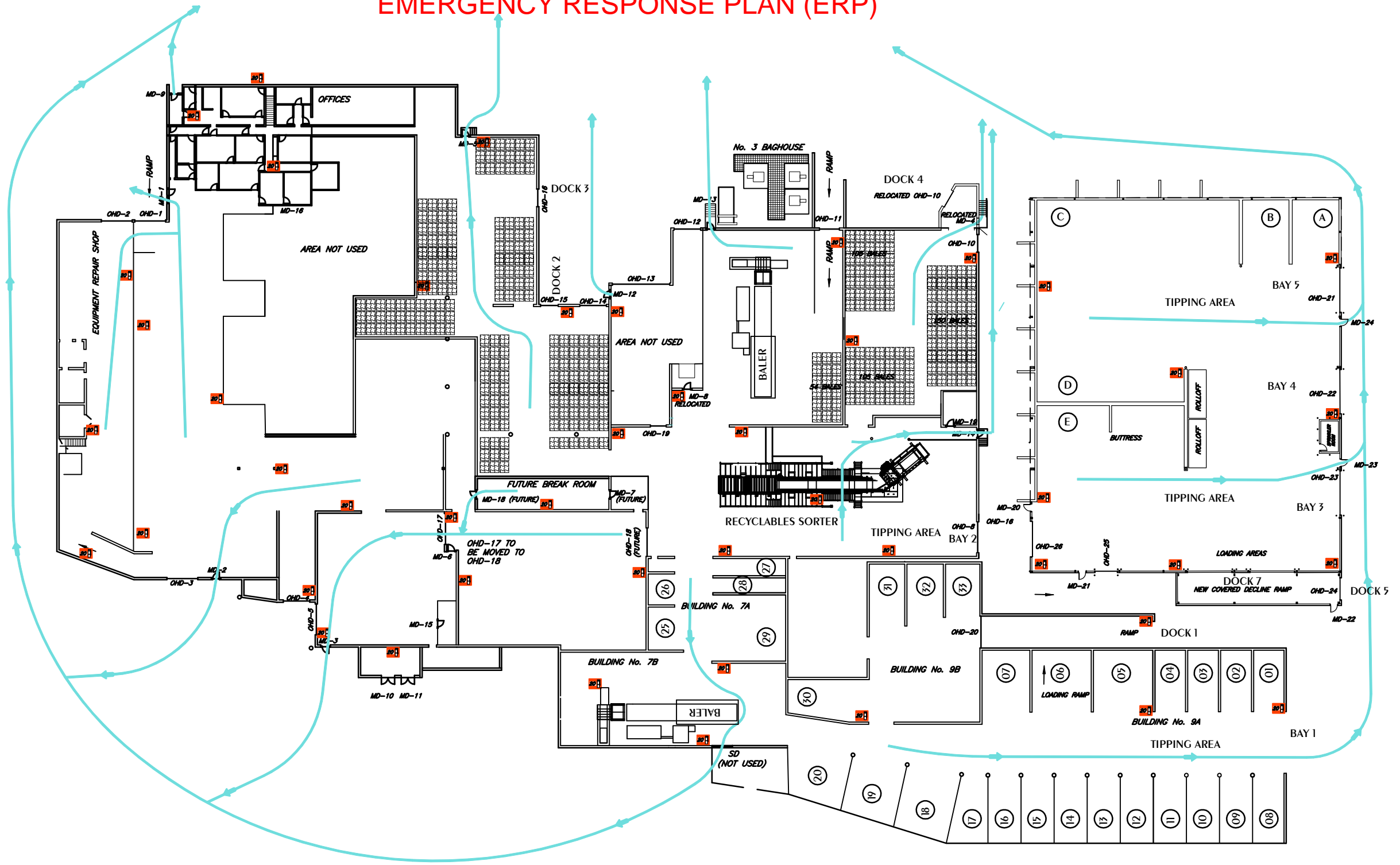
1. All vehicular traffic within the plant will cease, in order to allow safe exit of personnel and movement of emergency equipment. Vehicles must be parked off to the side of access roads and away from the buildings, without blocking exit aisles or doors. Keys must remain with the vehicles.
2. All personnel, visitors and contractors will immediately leave the facility area and proceed to the Emergency Assembly Area. The evacuation routes are posted throughout the facility and are shown on the diagram below.

EMERGENCY RESPONSE PLAN (ERP)

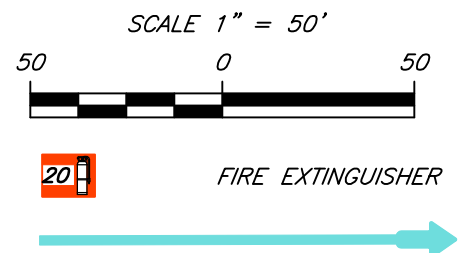
There are no critical operations in the facility; therefore, no one will remain within the facility during an evacuation notice. All personnel, visitors and contractors will be directed to an alternate Emergency Assembly Area, if the designated onsite Emergency Assembly Area is within the danger zone for the specific incident. (See *Exterior Evacuation Map for "Alternate Emergency Assembly Area."*)

3. No persons shall remain or re-enter the location after a complete evacuation has been announced.
4. SH personnel are to notify their drivers mobile phones and / or 2-way radios to:
 - a. Leave the truck and evacuate to the Emergency Assembly Area, or to
 - b. Take truck, leave premises and travel the access road to "Emergency Equipment Parking" area. (See *map immediately below for details.*)
 - c. Return after the "all clear" from the Emergency Coordinator (and/or Alternate).
5. Once outside the building, employees are to report to the designated Emergency Assembly Area. The Emergency Assembly Area, as shown in the diagram below, is located immediately WEST of the office entrance, on a concrete pad. If needed, personnel will be moved to the OFFSITE Emergency Assembly Area, located at gravel lot adjacent to the truck scale.
6. The Emergency Coordinator will take a head count at the Emergency Assembly Area to determine if there are any missing employees.
7. Contractors/visitors will be accounted for at the Emergency Assembly Area by the employees with whom they are working/visiting.
8. There will be NO attempt to find persons not accounted for, if a search involves endangering the lives of others by re-entry into situation areas.
9. The Emergency Coordinator will relay all pertinent information to the professional Emergency Responders.
10. Re-entry into the area will be made only after clearance is given by the Emergency Coordinator (and/or Alternate). At the EC's discretion, an "all clear" signal will be given for re-entry into the facility; and
11. In all questions of accountability, individual employees will be held responsible for those persons reporting to or visiting them. Visitors will be the responsibility of those employees they are seeing. Contractors are the responsibility of those persons administering the individual's contracts.

EMERGENCY RESPONSE PLAN (ERP)

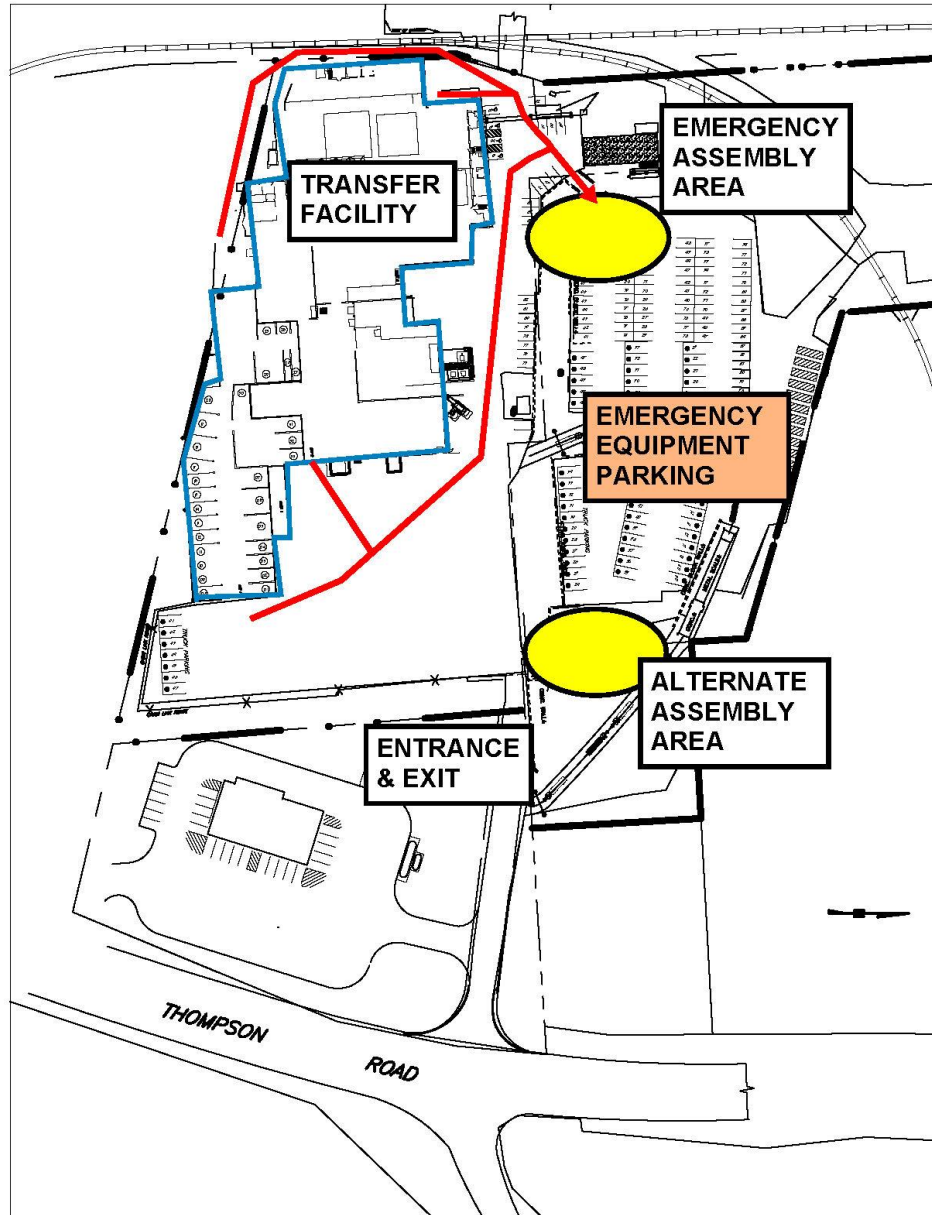


EVACUATION PLAN (INTERIOR)



EMERGENCY RESPONSE PLAN (ERP)

EVACUATION MAP (EXTERIOR)



EMERGENCY RESPONSE PLAN (ERP)

5.3.3. Neighboring Property Evacuation

The decision on whether or not to evacuate the neighborhood is made by the Primary Emergency Responder, which is often the first fire department on the scene. Such emergency responders are experienced, trained professionals, who are drilled on such emergency situations. To assess the need to notify the neighbors, the Emergency Coordinator will first contact Emergency Responders, in the order shown below:

- Call “911”
- Call the Village of East Syracuse Fire Department at 315-671-3380

Next, the Emergency Coordinator must provide the Primary Emergency Responder with the pertinent details, such as:

- The types and volumes of hazardous materials involved or potentially involved, if any;
- The wind direction;
- Potential for spills to reach surface water bodies or off-site properties; and
- The time of day.

Once a decision has been made to evacuate, the Emergency Responder (or his designates) is to contact the list of neighboring businesses, as shown below and on the following map.

EMERGENCY RESPONSE PLAN (ERP)

EMERGENCY CONTACTS - NEIGHBORS		
BLDG #	COMPANY	CONTACT NUMBER
1	Metalico Metal Recovery	315-463-9292
2	V & R Tool and Die	315-463-7360
3	Mckenzie Management	315-579-0345
4	Vacant	315-463-8914
5	Gilligan's Pub	315-432-9871
6	The Lash Studio	315-200-0624
7	Sandy's Appointment Styling Cent	315-437-1323
8	Goodies Mediterranean	315-433-1003
9	Nutronics	315-437-0033
10	Home Builders Assoc. of CNY	315-463-6261
11	Vacant	
12	OCWA	315-455-7061
13	Mothers Cupboard Diner	315-432-0942
14	Hoffman Station - see list below	
15	Byrne Dairy	315-913-3460
16	Wellnow Urgent Care	315-937-2007
17	Anderson Equipment	315-463-8673
18	Dunkin Donuts	315-399-5023
19	Bottle & Can Retrieval Center	315-437-1481
20	Ruston Paving	315-437-2533
21	Blackburn Truck Bodies	315-448-3236
22	Syracuse Auto Group	315-299-7129
23	Property Restoration Inc.	315-454-0518
24	Shawshanked Detailing	315-679-7899
HOFFMAN STATION		
SUITE	COMPANY	CONTACT NUMBER
100	Vera House	315-422-7273
101	Life-Force Sanctuary	315-434-8803
200	Reaction Fitness	315-802-7627
201	Leasing Office	
220	Forgarty Sales	315-463-0261
225	Syracuse Sox	
400	Murtaugh Construction	315-432-5600
401	Best in Bloom	315-741-0220
402	RWS-SYR, LLC	
403	Vacant	
500	Hanes Supply, Inc.	315-299-4114
501	Vacant	
502	Collective Goods	315-560-9997
600	Wise Foods, Inc.	315-434-9021
700	CNY Baseball Warehouse	315-532-3162
800	Rug Doctor	315-414-0238
801	Vacant	
802	Emerald City Window Cleaning	315-488-8088
803	Syracuse Yoga	315-399-4333
900	Onondaga Cty Florist Co-op	
1000	Appearance Property Mgmt	
1100	J&J Carpet	
1200	RBM Enterprises	315-463-7605
1500	Monster Inc.	

EMERGENCY RESPONSE PLAN (ERP)



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4.4. Decontamination and disposal

5.4. Decontamination Procedures

Syracuse Haulers Waste Removal Inc. personnel will **not** respond to spills or any other emergency incident, which is more than incidental and poses a safety or health hazard to them. For all spills or other emergency incidents that are more than incidental or pose a safety or health hazard, SH's Emergency Response Contractor, **Safety Kleen**, will be contacted by the Emergency Coordinator or the Alternate, if a spill or any other emergency incident poses a safety or health hazard to SH personnel or the surrounding community. If Safety Kleen needs to be called in, the contractor will be responsible for the remediation of the contaminated area of the facility, the equipment, as well as their own equipment.

If an incident occurs where heavy contamination levels are expected, a more rigorous decontamination protocol may be necessary, such as a hexane rinse for protective equipment and/or soap wash facility, along with appropriate rinsing. If oils or heavy contamination are encountered, then steam cleaning of work surfaces may be necessary. For small equipment (hand tools, analytical equipment), a wipe down with a soap spray may be sufficient. Again, for heavy contamination, aggressive remediation actions will be undertaken, as dictated by the circumstances.

6.2. Disposal Procedures

Safety Kleen will contain, collect and package hazardous materials for disposal in such a manner, as to avoid the potential for spreading contamination, creating a sanitary hazard, or causing litter to be left on-site. All potentially contaminated material (i.e. clothing, gloves, disposable equipment, and soil) will be drummed and disposed of off-site at a licensed facility. Additionally, all decontamination liquids (if any) will be collected, drummed and shipped off-site to a licensed facility for disposal. All proper documentation will be supplied by Safety Kleen and submitted to the appropriate authorities.

7. INCIDENT DOCUMENTATION

7.1. Post-Accident Investigation

At the conclusion of an incident that required the implementation of the contingency plan, the Emergency Coordinator and the employees, who are involved in the incident, must complete an Incident Report. *(See an example on the next page and in the "Appendix">"INCIDENT REPORT.")*

In addition, the Emergency Coordinator must ensure that follow-up documentation, if any is required, has been correctly prepared and submitted to State, Federal and Local officials within the specified time frames. *(See the tabbed section, "INCIDENTS, for details.)* Copies of all written reports / notifications are to be maintained in this section, to verify that Syracuse Haulers Waste Removal Inc. has met its legal obligations.

EMERGENCY RESPONSE PLAN (ERP)

7.2. Incident History

Any incidents that occur in the future must be documented and stored in the tabbed section, "INCIDENTS", to aid incident investigations and to facilitate planned reviews. Incident details, as well as accurate emergency histories, help to identify problem areas within the ERP and/or the facility so that future incidents may be avoided and that employee safety, during emergency responses, can be improved.

7.3. Incident Report

SH makes use of template to report on incidents, ensuring that the rights questions get asked and responses are properly noted. Appearing below is the blank 2-page form.

Should a reportable incident occur, the Emergency Coordinator is to complete this form within 15 days of the event. This document is used to assist in reviewing responses and seeking ways to improve upon actions taken during emergencies.

All completed forms are to be stored in the tabbed section of this binder, "INCIDENTS." (Also, see "Appendix"> "INCIDENT REPORT" for a full-size version.)

<p style="text-align: center;">INCIDENT REPORT Syracuse Haulers Waste Removal Inc.</p> <p>When did the incident occur? Date _____ Time _____</p> <p>Where did the incident occur?</p> <p>How did the incident occur?</p> <p>Who reported the crisis?</p> <p>Under whose control and what regulatory authorities are responsible or affiliated with the crisis?</p> <p>Describe the incident briefly.</p> <p>Were there any chemicals/oils or raw materials involved?</p> <p>Were there any reportable injuries, spills, or public notifications?</p> <p>What course of action was taken?</p> <p>Initials:</p> <p>Follow-Up:</p>	<p style="text-align: center;">INCIDENT REPORT <small>(continued)</small> Syracuse Haulers Waste Removal Inc.</p> <p>What actions are being taken to prevent/re-occurrences of an incident of this type? (Attach additional sheets, if necessary.)</p> <p>I hereby affirm the above mentioned is true to the best of my knowledge.</p> <p>_____ Signature Title Date</p> <p>_____ PRINT NAME TELEPHONE NUMBER</p>
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EMERGENCY RESPONSE PLAN (ERP)

8. TRAINING PLAN

Proper training is essential to the success of any emergency response action. All SH Transfer Facility employees will be trained in emergency response procedures, which are in keeping with their duties and responsibilities. SH will provide training for all new employees and provide refresher training for all existing employees, annually. Additionally, training will be provided whenever:

- There are changes to materials or equipment within the facility;
- The Contingency Plan is updated; and
- Exercises/Drills indicate that employees do not understand their responsibilities.

Basic training for all employees will be conducted by the Emergency Coordinator/Safety Coordinator and will include, at a minimum, the following topics:

- Risk/spill prevention.
- A review of the ERP and description of its components.
- Individual roles and responsibilities.
- Information about hazards (e.g. flammable liquids) and protective actions.
- Notification, warning and communication procedures.
- Emergency response procedures.
- Evacuation and accountability procedures.
- Location and use of common emergency equipment.

In addition to the basic training described above, facility personnel will each receive fire extinguisher training, annually. Records of all training, including who was trained, when, and by whom, should be documented and maintained on file in tabbed section, "TR REGISTER".

8.1. Employee Emergency Responsibilities

Employee's responsibilities and training requirements for actions covered in this document are described below.

Emergency Coordinator and Alternate(s):

1. Training/Education Requirements:
 - High School degree or equivalent
 - CPR training (Annually)
 - First Aid training (Annually)
 - Hazard Communication/SPCC training (Annually)
 - Fire extinguisher training (Annually)
 - A thorough knowledge of the facility and the Integrated Contingency Plan
2. Emergency Responsibilities:
 - Determining the need to activate the Integrated Contingency Plan
 - Determining when evacuation is required
 - Contacting outside response personnel. The Emergency Coordinator has the authority to contract with certified commercial response firms during an emergency.

EMERGENCY RESPONSE PLAN (ERP)

- Accounting for all personnel at the Emergency Assembly Area.
- Notifying the proper authorities.
- Training facility and office personnel.
- Updating outside response personnel during an emergency.
- Authorizing re-entry into the facility at the conclusion of an emergency action.
- Ensuring that emergency equipment is properly maintained.
- Documenting each incident and reviewing the Integrated Contingency Plan to insure its adequacy and that it is up-to-date.

Facility Personnel: (Attendants, Equipment Operators, Supervisors)

1. Training/Education Requirements
 - Contingency Plan training (Annually)
 - Hazard Communication training (Annually)
 - Fire extinguisher training (Annually)
2. Emergency Responsibilities
 - Notify the following individuals, in the order shown, when discovering an emergency incident:
 - Emergency Coordinator
 - Alternate
 - Steve Ruge
 - Evacuate the building and meet at the Emergency Assembly Area whenever the evacuation announcement is made.
 - Shut down all vehicles and equipment before evacuating but leaving the keys in their ignitions.
 - Account for all contractors/visitors that are at the SH Transfer Facility to meet with the employee(s) responsible for them.

Office Personnel: (Removed from the Transfer Facility)

1. Training/Education Requirements
 - Contingency Plan training (Annually)
 - Hazard Communication training (Annually)
2. Emergency Responsibilities
 - Notify the Emergency Coordinator when an emergency incident is discovered.
 - Contact outside response personnel at the discretion of the Emergency Coordinator or in the event the Emergency Coordinator is incapacitated as a result of the emergency.
 - Evacuate the building and meet at the Emergency Assembly Area, if an evacuation announcement is made.
 - Account for all contractors/visitors that are at the Office to meet with the employee(s) responsible for them.

EMERGENCY RESPONSE PLAN (ERP)

8.2. Exercises and Drills

Conducting exercises is one of the best means for assessing emergency plans and procedures, for determining the readiness of emergency responders, for resolving questions of coordination and clarifying roles and responsibilities, and for promoting awareness of potential hazards.

Once employees have been trained, Syracuse Haulers will conduct exercises to determine if the ERP is workable and to determine if people are properly trained. In addition, it will give employees an opportunity to become familiar with their responsibilities so that they will act more instinctively during an emergency.

Each exercise will revolve around a potential emergency that is likely to arise at Syracuse Haulers (e.g. a release of a flammable material). At least one exercise a year will be coordinated with the outside agencies that will respond to an actual emergency. These agencies include the Village of East Syracuse Fire Department and Police Department, EMTs, and Safety Kleen. The exercise will be carried through each phase of an emergency (e.g. discovery, notification, and evacuation) following the steps listed in the ERP.

During the exercise, an independent, outside emergency response professional will act as observer to evaluate the quality of the response. Following the exercise, the observer, the Emergency Coordinator, and the responding agencies should thoroughly analyze each component of the response and make recommendations for modifying the ERP or re-training personnel.

EMERGENCY RESPONSE PLAN (ERP)

9. ERP AUDIT

9.1. Critique, Plan, Review & Modification

SH will review the ERP at least once a year and under the following conditions:

- Upon consummation of arrangements with local fire department, police department, hospital, and commercial clean-up contractors.
- Plan fails during emergency or training exercise:
 - Unanticipated problems arise, or
 - Emergency contacts are not properly equipped to handle the situation.
- Personnel changes, such as the Emergency Coordinator or Alternate are changed.
- Facility altered:
 - Physical Modifications
 - Process Changes
 - Process Chemical Changes
 - Technical or Equipment Modifications, or
 - New Emergency Equipment Installed

As necessary, the appropriate revisions will be made to the ERP, from time-to-time.

9.2. Audits

Syracuse Haulers Waste Removal Inc. will audit the ERP at least once every three years, to verify that the procedures and practices developed in the Plan are adequate and are being followed.

EMERGENCY RESPONSE PLAN (ERP)

10. BLOODBORNE PATHOGENS EXPOSURE CONTROL PLAN

The nature of a Bloodborne Pathogen Exposure is different in form and substance than a Hazardous Materials Spill or a Fire/Explosion emergency. Therefore, the format and organization of this section of the ERP will appear different to you.

10.1. Policy Statement

Syracuse Haulers Waste Removal, Inc. (SH) has implemented a Bloodborne Pathogen Exposure Control Plan to meet the requirements of the OSHA Bloodborne Pathogens Standard (Toxic & Hazardous Substances, 1910.1030), as well as to inform and provide guidance to all employees. (See OSHA Bloodborne Pathogens Standard - <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910> for details.)

This biohazard control plan is readily available to all employees. During educational training sessions, employees are advised of its accessibility, and they are encouraged to review the Plan from time-to-time, to refresh their knowledge on the subject.

10.2. Purpose of the Plan

It is SH's objective to minimize employees' risk of exposure to potentially infectious diseases. This risk is minimized or eliminated by establishing policies and procedures that contain universal precautions for all incidents, involving occupational exposure to infectious diseases; by establishing standard procedures for the reporting of incidents involving occupational exposure to infectious diseases; and by providing training to all employees and vaccinations to employees, who are considered to have high or moderate risk of occupational exposure to potentially infectious diseases. (There are no SH employee classifications which are considered to be high or moderate risk, at this time; all positions are low risk.)

Universal precautions refer to approaches to infection control in which all human blood and certain human body fluids are treated, as if known to be infectious for HIV, HBV, or other bloodborne pathogens. These approaches recognize that there is no practical way to determine the health status of all persons who may be sources of bloodborne pathogens.

10.3. Responsibilities

Supervisors: SH Supervisors are responsible for exposure control in their respective areas. They work directly with the Emergency Coordinator/Safety Coordinator to ensure that proper exposure control procedures are followed.

Employees: SH employees have the most important role in our bloodborne pathogens compliance program; the ultimate execution of much of this Plan rests in their hands. Employees are required to:

- Know what tasks that they perform, which potentially expose them to bloodborne pathogens;
- Attend bloodborne pathogens training session(s) and keep current on all provided training materials;

EMERGENCY RESPONSE PLAN (ERP)

- Plan and conduct all task, activities, and operations in accordance with SH's established policies and procedures; and
- Maintain good personal hygiene habits

Risk of exposure to bloodborne pathogens should never be underestimated. Employees who do not follow the procedures outlined in this plan are subject to disciplinary action.

10.4. Policies & Procedures

10.4.1. Employer's Responsibilities

SH has established strict operational practices to minimize employee exposure to blood or other infectious materials. This starts with prohibiting the in-flow of possible bio-waste into the Transfer Facility:

- All putrescible waste (trash from municipalities), which is collected in roll-off containers, commercial trucks, and/or residential trash trucks, will always be transported straight to a trash disposal facility; it will NOT be brought to the SH Transfer Facility.
- Customers are instructed and communicated to about "what is acceptable waste" and "what is unacceptable waste", in reference to the Transfer Facility. Violators are addressed firmly and immediately. Materials intended for the Transfer Facility may be rejected and returned to the customer, if unacceptable waste is discovered.
- The SH "Truck Scale" has an integrated, radiation detector, which helps discover radioactive isotopes that may be present in medical waste, thus identifying sharps having trace radiation content. Such containers of waste are immediately returned to the customer for proper disposal by them.
- SH equips its Transfer Facility staff with Personal Protection Equipment (PPE) which is meant to protect employees from contact with possible bloodborne pathogens. (See "Appendix"> "SUPPLIES - PPE / First Aid / CPR Equipment" for details.)

10.4.2. Employee's Responsibilities

All employees are required to follow work practice controls (described below) to minimize employee exposure to blood or other infectious materials. Personal Protective Equipment (PPE) is to be worn, as indicated below.

Training on what PPE is required for each position and how the equipment is to be used is provided to all Transfer Facility employees. (See "Operating Plan" > "Training Curriculum" for details, as well "Appendix"> "SUPPLIES - PPE / First Aid / CPR Equipment" for details.)

10.4.2.1. Handling of Material While Sorting

All material will be dumped directly from a vehicle onto the tipping floor, without direct human contact. Motorized equipment, called a "loader", will "spread out" the mixed material until it is manageable and a visual inspection can be made by a Sorter, Equipment Operator, or Supervisor for any hazardous materials that may have been buried in the load. (See *the Facility Manual Section 4.2.3 Job Descriptions* for further details about the aforementioned positions.)

If at any time a sealed trash bag is spotted, it must be opened with a rake and all contents visually examined.

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Several important rules apply to sorting material:

- NEVER directly stick your hand into any pile or grab at any material, even while using protective gloves.
- NEVER lift any bag, including clear bags or paper bags, from the bottom. The rule is that a bag should not have to be lifted at all.
- NEVER carry any material close to your body or face; ALWAYS maintain an appropriate safe distance from the material so that there will be no bodily contact.
- If a clear bag of recycling (e.g. cans, cartons, plastic bottles, etc.) is found, ALWAYS carry away from body/face, by the neck of the bag.. if the bag has to be handled at all.

10.4.2.2. Hand Washing

SH maintains hand wash facilities. However, if circumstances come about where hand washing facilities are not readily available, SH shall provide employees with the appropriate waterless antiseptic hand cleaner, in conjunction with clean paper towels and antiseptic towelettes. When antiseptic hand cleaners or towelettes are used, hands should be washed with soap and running water, as soon as feasible.

- All employees shall wash hands and any other skin with soap and water and flush exposed mucous membranes with water, immediately, or as soon as feasible, following any contact of such bodily area, suspected of coming in contact with potentially infectious materials. Because hands are at risk of exposure while removing gloves, and gloves often leak or tear, employees are to wash their hands even if gloves are worn.
- The principle of good hand washing is that of using friction to dislodge and to remove microorganisms from the skin. **Hand washing is the single most important means of preventing the spread of infection.** Using proper hand washing techniques is important to the overall effectiveness of the preventive practice.
- Proper Hand Washing Procedures:
 1. Leave all rings on your hands.
 2. Turn on water (the warmer the better).
 3. Apply soap.
 4. Scrub hands, including palms, backs, between fingers, around and under fingernails, and wrists/arms if exposed, for at least 30 seconds, but preferably longer.
 5. Grasp ring(s) and move up and down finger(s) until thoroughly soaped.
 6. Rinse thoroughly in the same scrubbing manner, under running water.
 7. Dry hands with a clean paper towel.
 8. Using a paper towel, turn off the water faucet(s).
 9. All faucets, soap dispensers, or other surfaces, which were touched with contaminated hands, are considered contaminated and must be disinfected with an approved cleansing product. (Faucets can be cleaned while washing hands with disinfectant soap.)

EMERGENCY RESPONSE PLAN (ERP)

- (See “Appendix”> “SUPPLIES -- PPE / First Aid / CPR Equipment” for a list of approved products for use in protecting individuals from the spread of bloodborne pathogens.)

10.5. Bio-Waste and Sharps Controls

It is against the policy and operating procedures of SH to accept, handle, or otherwise process any biological waste (referred to as “medical waste” and “bio-waste”), under any circumstances. This includes contaminated medical dressings, clothing, specimen containers, etc. Also prohibited are contaminated medical utensils, which could cut or puncture the skin of an employee. These utensils include needles, lancets, pipettes, and etc., and they are collectively referred to as “sharps.” As a result, SH takes numerous precautions to minimize the entry into the Transfer Facility of bio-waste, sharps, and/or unknown materials.

10.5.1. Operational Practices

- Prior to pickup of waste streams, customers are informed that medical waste cannot be accepted in its containers and that regulatory authorities will be contacted should a customer violate the law. The customer is also subjective to additional fees to process the cleanup of bio-waste. Customers are continually educated in both verbal and written communications. (See “Appendix”>”Roll-Off Dispatch Checklist” and “Roll-Off Restrictions Letter” for details.)
- Another control includes a truck scale with integrated radiation detection, over which each vehicle entering the Transfer Facility must pass. (The radiation detection identifies any radioactive isotopes, which are present in some but not all medical waste.) Should detection occur, the closed container is returned to its source for proper disposal.
- Also, staff is instructed and trained to separate and open trash bags with rakes and to visually inspect contents for the presence of bio-waste. Employees are instructed to collect and scoop any suspected bio-waste into designated containers. All of this is to be done “no touch”, that is without any direct human contact, using rakes and shovels to handle the suspected materials.
- SH has positioned containers within the Transfer Facility, which are specifically designed for collection of bio-waste. These containers are constructed to contain all contents and prevent leakage of fluids during handling, storage, transport or shipping. Containers must be closed prior to being handled, stored, or transported. They are clearly labeled using the universal biohazard symbol and the word “biohazard”. Should any contaminants be placed in these containers, the Emergency Coordinator notifies Safety Kleen for proper disposal.

Other SH work practices stipulate:

- Employees are to use caution and avoid contaminated sharp objects, such as broken glass, sharp metal, needles, and etc. Sharps will NOT be handled through direct human contact, instead they will be swept-up using a dust pan and broom, or picked-up with tongs or shovel. All sharps, whether known to be contaminated or not, are to be placed in the SH-supplied biohazard containers, which are designed and designated for this purpose. These containers are:

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- closable and not able to be opened except by the use of tools.
 - puncture-resistant.
 - leak-proof on bottom and sides to prevent seepage of contaminated liquids.
 - labeled using the universal biohazard symbol and the word "biohazard".
- Sharps containers must be readily accessible, maintained in an upright position during use, and replaced routinely so that they are not overfilled.
 - When moving containers of sharps, the containers must be closed so that their contents do not spill or protrude.
 - If leakage of the primary container is anticipated or suspected, the container must be placed into a second container that is closable, labeled, and shall safely contain all the contents without leaking. Additionally, surrounding areas and the containers are to be sprayed with SH-supplied disinfectant, and the Emergency Coordinator is to be immediately notified of the situation. (See "Appendix">"SUPPLIES-- PPE / First Aid / CPR Equipment" for details.)

10.6. Personal Protective Equipment (PPE)

SH has established strict work practices that minimize direct, human contact with waste streams. (See content in this section of the ERP and in the "Operating Plan" > "Training Curriculum" for details.) However, in a worst case scenario, where work practices are not followed comprehensively, an employee could have direct contact with blood, other potentially infectious materials, mucous membranes, and non-intact skin when handling or touching contaminated items or surfaces. For these reasons, certain personal protection equipment is required of all employees who work in or visit the Transfer Facility.

Personal protective equipment includes "any item that an individual wears or uses on his/her person to provide barrier protection of the skin or mucous membranes from contamination by blood or other potentially infectious materials."

The use of appropriate PPE is required, as supplementary protection, in all situations where occupational exposure remains, after the implementation and enforcement of SH work practices. The use of personal protective equipment is required of all employees or visitors, when engaged in tasks or situations where exposure is reasonably anticipated.

10.6.1. Provision and Use of PPE

- SH has determined the appropriate types of PPE necessary, in order to provide barrier protection for its employees, depending upon each job type and/or job title. Appropriate PPE shall be readily accessible to all employees (and visitors) for whom it is required and shall be provided in appropriate sizes. (See the "Operating Plan"> "Training Curriculum" for a list of all approved and required PPE by position and see "Appendix"> "SUPPLIES -- PPE / First Aid / CPR Equipment" for specifications of all PPE in use at the Transfer Facility.)
- SH shall provide, clean, launder, dispose of and/or replace all SH-supplied PPE, at no cost to the employee.

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- All affected employees are required to remove their PPE prior to leaving the work area. All PPE must be placed in a designated area or container for storage, washing, laundering, decontamination, and/or disposal.

10.6.2. Non- Permeable Work Gloves and Nitrile Gloves

- Non-permeable work gloves shall be worn at all times, while in the work area, to protect workers from coming in contact with solids and liquids that could be a biohazard.
- The SH-approved gloves have been selected to be impervious to liquids and strong enough to withstand the tasks to be performed by Transfer Facility employees.
- Use of nitrile gloves is intended to cover defects in the skin on the hands and is not intended to provide protection from puncture wounds caused by sharps.
- Gloves, either of the non-permeable work or nitrile variety, shall be changed when physical damage to the integrity of the glove is observed (e.g. tearing, surface defects).
- Contaminated nitrile gloves should be discarded into a biohazard waste container immediately after removal.
- Employees with known minor skin defects (e.g. cuts, abrasions, burns, dermatitis on arms, hands, face or neck) must cover these areas with a water-resistant occlusive bandage, in addition to the use of personal protective equipment.
- Gloves do not replace hand washing. Employees are to wash hands as soon as practical, when there is suspected contact with bio-waste and upon leaving the work area for any reason.
- SH uses, only, disposable, gloves that meet certain specifications. (See "Appendix"> "SUPPLIES -- PPE / First Aid / CPR Equipment" for details.)

10.6.3. Particulate Respirator (Breathing) Mask Protection

- Breathing masks are intended to protect the nose and mouth from coming into contact with blood or body fluid droplets.
- Employees shall wear protective masks whenever nose or mouth contamination can be reasonably anticipated.
- Employees shall remove masks when leaving the work area. All disposable masks must be discarded in a biohazard waste container when visibly contaminated or penetrated by blood.

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- SH uses, only, disposable, particulate respirator (breathing) masks that meet certain specifications. (See “Appendix”> “SUPPLIES -- PPE / First Aid / CPR Equipment” for details.)

10.6.4. Eye Protection

- Protective eyeglasses with non-permeable side vents are intended to protect the eyes from coming into contact with blood or body fluid droplets.
- Employees shall wear eye protection whenever eye contamination can be reasonably anticipated.
- Employees shall remove eye protection when leaving the work area. Reusable eye wear that is visibly contaminated, should be washed with soap and water, using gloved hands, and then decontaminated.
- SH uses, only, eye protection that meet certain specifications. (See “Appendix”> “SUPPLIES -- PPE / First Aid / CPR Equipment” for details.)

10.6.5. Cardiopulmonary Resuscitation (CPR) Masks

- Employees whose tasks include participation in cardiopulmonary resuscitation (CPR) shall use a one (1)-way mask when performing mouth-to-mouth resuscitation. Masks shall be provided and made readily available wherever the need for CPR may be reasonably expected to occur.
- Each mask that is visibly contaminated should be washed with soap and water using gloved hands, and then decontaminated. The mouthpiece shall be disposed of after each use.
- SH uses, only, CPR barrier masks that meet certain specifications. (See “Appendix”> “SUPPLIES -- PPE / First Aid / CPR Equipment” for details.)

10.6.6. Work Environment

All permanent work places have access to the following:

- Appropriate Personal Protective Equipment (PPE) for any reasonably anticipated infectious disease or hazardous materials exposure;
- An Infection Control Spill Kit containing, at minimum:
 - An appropriate disinfectant / antibacterial spray, to decontaminate incidental spills of infectious material.
 - NABC non-acid disinfectant
 - Two pairs of nitrile gloves

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- One package of biohazard wipes
- Appropriately marked biohazard waste containers with red biohazard tags
- A first aid kit containing, at minimum:
 - A CPR barrier device
 - Nitrile gloves
 - Bandage and dressing supplies to control bleeding
- An eye washing facility
- Signage that directs individuals to each of the above items, indicating where the PPE is being stored. (In the event that a specific PPE cannot be found, employees are to contact their supervisor.)

10.7. Exposure Risk Determination

WM Engineering, an engineering firm under contract to Syracuse Haulers, has conducted a "Personal Protective Equipment Hazard Assessment" for each job classification at the SH Transfer Facility. (See the "Appendix">"PPE Hazard Assessment" for details on the assessments.)

In summary, the engineers report the following levels of risk exposure for each job classification / job position at the Transfer Facility:

High Risk

(Shown are job classifications / job positions for which an employee has a high risk of exposure.)

Job Classification	Tasks placing employees at risk
NONE	NONE

Moderate Risk

(Shown are job classifications / job positions for which an employee has a moderate risk of exposure)

Job Classification	Tasks placing employees at risk
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NONE	NONE
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Low Risk

(Shown are job classifications / job positions for which employees are expected to have minimal, if any, risk of occupational exposure to bloodborne pathogens.)

Job Classification	Tasks placing employees at risk
SORTER – Tipping Floor	Sorting through the waste streams with rakes and other implements. (This job is “no touch”, i.e. the waste stream is not touched by human hands.)
SORTER – Green Machine	Extract non-recyclable material from an evenly distributed conveyor line. Extracted material to be dropped into appropriate chute for proper disposal.
EQUIPMENT OPERATOR	Pushing, sorting, scooping and otherwise moving waste with specialized motor vehicles. (This job is “no touch”, i.e. the waste stream is not touched by human hands.)
SUPERVISOR	Instructing Equipment Operators and Attendants on what activities to perform and when. (This job is “no touch”, i.e. the waste stream is not touched by human hands.)
EMERGENCY/SAFETY COORDINATOR	Instructing Equipment Operators and Attendants on what activities to perform and when. (This job is “no touch”, i.e. the waste stream is not touched by human hands.)
ALTERNATE EMERGENCY/SAFETY COORDINATOR	Instructing Equipment Operators and Attendants on what activities to perform and when. (This job is “no touch”, i.e. the waste stream is not touched by human hands.)

10.8. Procedure for Clean-Up of Blood or Body Fluid Spills

While it has been determined that the risk of exposure to bloodborne pathogens is LOW for Transfer Facility employees, SH has established the following procedure to clean-up clearly identified or suspected contaminants.

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- Should you identify actual or suspected contaminants, then you should signal and communicate to your co-workers of your findings and remind them to stay clear of the area. All work within a 10 foot radius should cease. You must ALWAYS AVOID BODILY CONTACT with the contaminants.
- Immediately notify the Emergency Coordinator or Alternate of the discovery; you will receive guidance on whether to proceed with clean-up or to step away and await the arrival of an Emergency Responder.
- If directed to proceed with clean-up, go to the PPE storage area and collect the following materials and return to the discovery site with these in your possession:
 - Infection Control Kit
 - Biohazard Bag
 - Biohazard Container
- Proceed with clean-up, in the following step-by-step fashion:
 - Be sure to put on a particulate mask and your goggles.
 - Next, put on nitrile gloves under your non-permeable gloves.
 - To pick up contaminated sharps, broken glass, or any object that could cause a cut or puncture would, use a broom, shovel/dust pan, and/or tongs. NEVER USE YOUR HANDS TO COLLECT THE CONTAMINANTS.
 - Carefully place the collected sharps directly into a biohazard container.
 - To pick up contaminated medical dressings, papers, or clothing, use a broom, shovel/dust pan, and/or tongs. NEVER USE YOUR HANDS TO COLLECT THE CONTAMINANTS.
 - Carefully place the collected materials into the Biohazard Bag
 - Clean the contaminated area with materials provided in the Infection Control Kit, as directed, and place the clean-up materials into the Biohazard Bag.
 - Carefully remove your gloves and other PPE that may have become contaminated and place them in the Biohazard Bag.
 - Lift the Biohazard Bag by its top, form a “neck”, and then tie the bag around its neck to secure contents inside.
 - Place the Biohazard Bag into the puncture-proof Biohazard Container and return the container to its storage location.
 - Wash hands with soap and water for at least 30 seconds, before returning to work.

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10.9. Post-Exposure Management

In the event that an employee has bodily contact with known or suspected bloodborne pathogens, the following steps are to be taken:

- Wound and skin exposure shall be immediately washed with soap and water for approximately 15 minutes.
- Eye and mucous membrane exposures shall be rinsed in running water for 15 minutes.
- Exposure shall be reported to a Supervisor, who will in turn contact the Emergency Coordinator and/or Alternate.
- Supervisor and Employee shall begin to complete the appropriate paperwork, which includes:
 - *“Bloodborne Pathogens Exposure Report”*
 - *“Exposure Determination Questionnaire”*
 - *“Post-Exposure Evaluation & Follow-up Checklist”*
 - *“Post-Exposure Medical Evaluation Declination” (Optional)*

These four (4) forms are combined in one packet. (See *“Appendix” > “Bloodborne Pathogen Exposure Packet”* for details)

- Additionally, the *“Sharps Injury Log Form”* is to be completed, if the individual’s skin was punctured by a sharp object. (See *“Appendix” > “SHARPS INJURY LOG FORM”* for details.)

NOTE: Under no circumstances should the completion of paperwork delay medical treatment.

- A Supervisor or designated individual shall transport the exposed individual, as soon as possible (within one [1] hour), to the closest treatment center:

Wellnow Urgent Care

6227 Thompson Road
Syracuse, NY 13206

315.401.3204 (Call in advance of departure to verify that the employee can be received.)

University Hospital

750 East Adams Street
Syracuse, NY 13210

315.464.8633 (Call in advance of departure to verify that the employee can be received.)

St. Joseph’s Hospital

301 Prospect Ave
Syracuse, NY 13203

315.448.5111 (Call in advance of departure to verify that the employee can be received.)

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(See "Appendix"> "Emergency Contacts" for additional providers.)

- The route and circumstances of the exposure shall be documented on the above listed forms.
- The identification of the source individual shall be documented on the above listed forms, unless it is not possible to determine the source.
- The exposed employee's blood will be drawn, as soon as feasible after consent is obtained, and tested to determine HBV, HVC and HIV serological status. If the employee consents to baseline blood collection, but does not give consent at the time for serologic tests, the sample will be preserved for 90 days. If within 90 days of the exposure incident, the employee elects to have the baseline sample tested, such testing shall be done as soon as feasible.
- The exposed employee will receive post exposure vaccine(s) when medically indicated, as recommended by the treating physician.
- The exposed employee will receive appropriate medical counseling by the treating physician
- SH will ensure that the healthcare professional, who is evaluating an employee after an exposure incident, is provided with the following:
 - A description of the exposed employee's duties as they relate to the exposure incident
 - Documentation of the route(s) of exposure and circumstances under which exposure occurred
 - Results of the source individual's blood testing, if available
- Exposed employees will work directly with the treating physician to determine the appropriate post exposure follow up.

(See "Operating Plan">"Training Curriculum" for more details.)