

D1 INTRODUCTION

Every effort will be made to minimize the potential for spills or releases associated with the proposed field investigations. The risk of spills or release to the environment can be managed through the development and implementation of a site-specific Spill Response Plan. The Spill Response Plan identifies the potential for spills or release to the environment and immediate actions that will be taken in response to a spill or release. In addition, the spill response plan developed by CSSA site personnel will reviewed and incorporated, as appropriate, during site investigations.

D2 POTENTIAL SPILL OR RELEASE CONDITIONS

The greatest potential for spills or releases occurs during subsurface investigations and during the handling of drummed wastes generated by drilling activities. For this reason, the spill response plan lists procedures that must be followed during the proposed subsurface investigation to minimize the potential for releases and to minimize the impact to human health or the environment during an emergency spill or release. In addition, the responsibilities of personnel during a spill or release are summarized.

D3 DRILLING SAFETY PRECAUTIONS

Before any drilling or augering operations are performed, Parsons field team will determine from existing utility diagrams and site interviews whether underground installations (i.e., sewers, telephone, water, fuel, electrical lines, process lines, waste transfer lines, or liners) are anticipated in the vicinity of the proposed drilling location(s). All drilling, augering, and excavation locations must be cleared by CSSA personnel before any drilling, augering, or excavation can be performed. Drilling, augering, or excavation will not commence until an excavation permit has been issued by the appropriate CSSA authorities.

Prior to drilling, the locations of all underground installations will be investigated, as described above. In addition, drilling or augering will be performed in a cautious manner, slowly, with frequent checks for obstructions. A metal rod may be pushed into the soil and used to probe for obstructions at each drilling location.

D4 DRUM HANDLING PRACTICES

The wastes generated through site investigations (decontamination fluids, soil cuttings, soiled PPE, etc.) will be appropriately handled prior to disposal. The generated wastes will be placed in properly labeled 55-gallon drums that will be staged to minimize interference with site investigation activities. Drum labels will contain information concerning drum contents, date of collection, generator name, and characterization of waste materials, as described in Section 7 of the Site Investigation Plan.

Accidents may occur during handling of drums that may result in spillage from drums or physical injury. To improve the safety of drum handling activities, the following procedures will be followed.

The drums will initially be staged near the point of generation; however, drum placement will not interfere with site activities. Following generation and labeling, the drums will be moved to a specially designated area for staging prior to disposal. Prior to

handling, drums will be inspected visually to identify contents (as described by drum labels) and verify drum integrity. Incompatible wastes will be segregated during storage. Adequate aisle space will be maintained between drums. To minimize the potential for accidents, drums will only be handled when necessary. Before moving any drums, the appropriate sequence for moving drums and other containers will be determined. Personnel will be trained in proper lifting and drum moving techniques to minimize the potential for injuries. Equipment with sufficient rated load capacity will be selected to handle anticipated loads during drum staging.

Injuries associated with improper drum handling activities will be reported to the site health and safety officer and first aid or appropriate medical attention will be given to the injured worker. An accident report form will be completed as described by the Health and Safety Plan and notifications will follow standard procedures.

D5 Emergency Spill Response Actions

In the event that a release occurs during or caused by remediation activities, emergency spill response actions will be initiated. Generally appropriate spill response actions are to stabilize and contain the release to the extent possible with available equipment (shovels or drilling materials bags) without endangering field personnel, determining the nature of the release materials, and immediately reporting to the Parsons field team field team leader.

Important release or spill information the Parsons field team field team leader will request includes:

- Where the release occurred;
- What was released;
- What caused the release;
- Approximately how much was released;
- What is known about the release materials (for example, if the spill or release materials are odoriferous);
- Environmental or human health impacts caused by the release;
- Efforts made to contain the release; and
- An estimate of necessary equipment or personnel that will be required to contain or control the release.

The Parsons field team field team leader will be responsible for reporting release or spill information to base personnel and Parsons management.