NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Permits, Region 3
21 South Putt Corners Road, New Paltz, NY 12561-1620
P: (845) 256-3054 | F: (845) 255-4659
www.dec.ny.gov

March 8, 2024

Mark Hoffman, Environmental Director
Ecobat Resources New York, LLC
Mark.Hoffman@ecobat.com

Re: Ecobat Resources New York, LLC
DEC ID: 3-3352-00145/00001
Town of Wallkill, Orange County
PERMIT MODIFICATION

Dear Mark Hoffman:

The New York State Department of Environmental Conservation (DEC) has completed its review of the minor permit modifications requested via two emails dated August 14, 2023 and February 13, 2024 (see enclosures). The DEC approves Ecobat Resources New York, LLC's minor permit modification requests and the revised permit pages enclosed for the following:

- Revere Permit Attachment A – Site Identification Form 8700-12
- Revere Permit Attachment A – Facility Layout Site Plan
- Revere Permit Inc. Doc. #2 – Operations Plan Appendix 1-B Site Map
- Revere Permit Inc. Doc. #4 – Security & Facility Inspection Plan Appendix 3B
- Revere Permit Inc. Doc. #5 – Personnel Training Plan Appendix 4A
- Revere Permit Inc. Doc. #6 – Integrated Contingency Plan inclusive of Appendix K Plot Plan
- Permit Modification Log

These permit modifications are minor modifications in accordance with 6 NYCRR Part 373-1.7(c)(1)(i), 6 NYCRR Part 373-1.7(c)(1)(vii), 6 NYCRR Part 373-1.7(c)(1)(viii) and 6 NYCRR Part 373-1.7(c)(15)(ii)('a').

In accordance with 6 NYCRR Part 373-1.7 and Part 621, Ecobat Resources New York, LLC is required to send an announcement of all modifications to all persons/parties on the facility mailing list, to units of local government, and to each State agency having authority over the operation of the facility.

If there are any questions, please feel free to contact Shaen Guang, NYSDEC Division of Materials Management, Albany at Shaen.Guang@dec.ny.gov or me at rebecca.crist@dec.ny.gov.

Re: Ecobat Resources New York, LLC
DEC ID: 3-3352-00145/00001
Town of Wallkill, Orange County
PERMIT MODIFICATION

Respectfully,

Rebecca S. Crist

Rebecca S. Crist
Deputy Regional Permit Administrator

Enc: August 14, 2023 Ecobat notification letter
February 13, 2024 Ecobat notification letter
DEC-approved modified permit pages

cc: Adolph Everett, EPA Region 2
Edward Guster, EPA Region 2
Thomas Mann, Ecobat Resources New York, LLC
Stefanie Scruggs, Ecobat Resources New York, LLC
Town of Wallkill
Dave Pollack, NYSDEC R3 Regional Engineer
Casey Eganey, NYSDEC Division of Materials Management, R3
Brad Shaw, NYSDEC Division of Materials Management, Albany
Shaen Guang, NYSDEC Division of Materials Management, Albany
William Bennett, NYSDEC Division of Environmental Remediation, Albany

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August 14, 2023

Regional Permit Administrator
Division of Environmental Permits
New York State Department of Environmental Conservation
Region 3 Office
21 South Putt Corners
New Paltz, NY 12561
c/o john.petronella@dec.ny.gov

FedEx # 7730 4402 4170

Re: Minor RCRA Part 373 Permit Modification
Ecobat Resources New York, LLC, USEPA ID #NYD030485288

Dear Mr. Petronella:

In accordance with 6 NYCRR 373-2.4(e), attached is an updated revision of the following:

- Ecobat Permit Attachment A - Facility Layout Site Plan;
- Ecobat Permit Inc. Doc. #2 - Operations Plan App 1-B;
- Ecobat Permit Inc. Doc. #4 – Appendix 3B;
- Ecobat Permit Inc. Doc. #5 – Personnel Training Plan Appendix 4A;
- Ecobat Permit Inc. Doc. #6 - Integrated Contingency Plan;
- Ecobat Permit Inc. Doc. #6 App K Plot Plan; and,
- Permit Modification Log (Rev 9).

Ecobat has included the updated RCRA Permit Modification Log for your file and reference. This log summarizes the changes incorporated into these documents. Ecobat considers each of these changes to be a minor permit modification and requests Department approval in accordance with 6NYCRR 373-1.7.

Please find attached a set of hardcopies of the above-mentioned plans, sections and appendices for your file copy. Upon approval, a hardcopy of the notice of permit modification will be mailed to the Facility mailing list and the copy located in the Public Repository will be updated accordingly.

Please do not hesitate to contact me at 845-673-2225 should you have any questions or require additional information.

Respectfully,

Mark D. Hoffman
EH&S Compliance Sr. Manager, Ecobat Resources New York, LLC
845-673-2225

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Enclosures:

Ecobat Permit Attachment A - Facility Layout Site Plan;
Ecobat Permit Inc. Doc. #2 - Operations Plan App 1-B;
Ecobat Permit Inc. Doc. #4 – Appendix 3B;
Ecobat Permit Inc. Doc. #5 – Personnel Training Plan Appendix 4A;
Ecobat Permit Inc. Doc. #6 - Integrated Contingency Plan;
Ecobat Permit Inc. Doc. #6 App K Plot Plan; and,
Permit Modification Log (Rev 9).

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Electronic Cc (via e-mail) and Thumb Drive (via FedEx):

Regional Remediation Engineer — FedEx # 7730 4393 2431
New York State Department of Environmental Conservation
Region 3 Office
21 South Putt Corners Road
New Paltz, NY 12561-1696
c/o maryanne.oconnor@dec.ny.gov

Chief, RCRA Programs Branch — FedEx # 7730 4396 5180
Division of Environmental Planning and Protection
U.S. Environmental Protection Agency, Region 2
290 Broadway
New York, NY 10007-1866
c/o Everett.adolph@epa.gov

Chief, RCRA Permitting Section — FedEx # 7730 4398 7839
Division of Materials Management
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-7017
c/o lynn.winterberger@dec.ny.gov

Electronic Cc (via e-mail):

Edward Guster, EPA Region 2 (Guster.Edward@epa.gov)
William Bennett, NYSDEC Central Office (william.bennett@dec.ny.gov)
Henry Wilkie, NYSDEC Central Office (henry.wilkie@dec.ny.gov)
Casey Eganey, NYSDEC Region 3 (casey.eganey@dec.ny.gov)
Stefanie Scruggs, Ecobat Resources US, LLC (Stefanie.Scruggs@ecobat.com)
Thomas Mann, Ecobat Resources US, LLC (Thomas.Mann@ecobat.com)

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February 13, 2024

Regional Permit Administrator
Division of Environmental Permits
New York State Department of Environmental Conservation
Region 3 Office
21 South Putt Corners
New Paltz, NY 12561
c/o john.petronella@dec.ny.gov

FedEx # 7751 6943 6325

Re: Minor RCRA Part 373 Permit Modification
Ecobat Resources New York, LLC, USEPA ID #NYD030485288

Dear Mr. Petronella:

In accordance with 6 NYCRR 373-2.4(e), attached is an updated revision of the following:

- Ecobat Permit Attachment A – Part A Application Text (Form 8700-12); and,
- Permit Modification Log (Rev 10).

Ecobat has updated the Site name to Ecobat Resources New York from the former name of Revere Smelting & Refining. Site Contact information has also been updated. An updated RCRA Permit Modification Log has been included for your file and reference. This log summarizes the changes incorporated into these documents. Ecobat considers each of these changes to be a minor permit modification and requests Department approval in accordance with 6NYCRR 373-1.7.

Please find attached a hardcopy of the Part A Application Form 8700-12 to reflect the name change to Ecobat Resources New York, LLC for your file copy. Upon approval, a hardcopy of the notice of permit modification will be mailed to the Facility mailing list and the copy located in the Public Repository will be updated accordingly.

Please do not hesitate to contact me at 845-673-2225 should you have any questions or require additional information.

Respectfully,

Mark D. Hoffman
Environmental Director, Ecobat Resources New York, LLC
845-673-2225

Enclosures:
Ecobat Permit Attachment A – Part A Application Text (Form 8700-12); and,
Permit Modification Log (Rev 10).

Electronic Cc (via e-mail):

Regional Remediation Engineer
New York State Department of Environmental Conservation
Region 3 Office
21 South Putt Corners Road
New Paltz, NY 12561-1696
c/o casey.eganey@dec.ny.gov

Chief, RCRA Programs Branch
Division of Environmental Planning and Protection
U.S. Environmental Protection Agency, Region 2
290 Broadway
New York, NY 10007-1866
c/o Everett.adolph@epa.gov

Chief, RCRA Permitting Section
Division of Materials Management
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-7017
c/o Brad.Shaw@dec.ny.gov

Electronic Cc (via e-mail):

Edward Guster, EPA Region 2 (Guster.Edward@epa.gov)
William Bennett, NYSDEC Central Office (william.bennett@dec.ny.gov)
Shaen Guang, NYSDEC Central Office (shaen.guang@dec.ny.gov)
Henry Wilkie, NYSDEC Central Office (henry.wilkie@dec.ny.gov)
Thomas Mann, Ecobat Resources New York, LLC (Thomas.Mann@ecobat.com)
Stefanie Scruggs, Ecobat Resources US, LLC (Stefanie.Scruggs@ecobat.com)

Ecobat Resources

Permit Attachment A

Part A Application (Form 8700-12)

OMB# 2050-0024; Expires 01/31/2017

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.

United States Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal (MARK ALL BOX(ES) THAT APPLY)

Reason for Submittal:

- ☐ To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)
- ☐ To provide a Subsequent Notification (to update site identification information for this location)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ■ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #_____)
- ☐ As a component of the Hazardous Waste Report (If marked, see sub-bullet below)
  - ☐ Site was a TSD facility and/or generator of >1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)

2. Site EPA ID Number

EPA ID Number: NYD030485288

3. Site Name

Name: Ecobat Resources New York, LLC

4. Site Location Information

Street Address: 65 Ballard Road

City, Town, or Village: Middletown | **County:** Orange

State: New York | **Country:** USA | **Zip Code:** 10941

5. Site Land Type

☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

6. NAICS Code(s) for the Site (at least 5-digit codes)

A. 331492 | C. | B. | D.

7. Site Mailing Address

Street or P.O. Box: 65 Ballard Road

City, Town, or Village: Middletown

State: New York | **Country:** USA | **Zip Code:** 10941

8. Site Contact Person

First Name: Mark | **MI:** D | **Last:** Hoffman

Title: Environmental Director

Street or P.O. Box: 65 Ballard Road

City, Town or Village: Middletown

State: New York | **Country:** USA | **Zip Code:** 10941

Email: mark.hoffman@ecobat.com

Phone: (845) 673-2225 | **Ext.:** | **Fax:** (845) 692-5250

9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner: Eco-Bat Resources New York, LLC | **Date Became Owner:** 1/14/2003

Owner Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

Street or P.O. Box: 2121 N. Pearl Street, Suite 1400

City, Town, or Village: Dallas | **Phone:** (214) 631-6076

State: TX | **Country:** USA | **Zip Code:** 75201

B. Name of Site's Operator: Ecobat Resources New York, LLC | **Date Became Operator:** 11/1/1972

Operator Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Tribal ☐ Municipal ☐ State ☐ Other

10. Type of Regulated Waste Activity (at your site)
Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-10.

Y ☑ N ☐ **1. Generator of Hazardous Waste**
If "Yes," mark only one of the following – a, b, or c.

- ☑ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs/mo.) or more of hazardous waste; **or** Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; **or** Generates, in any calendar month, **or** accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material.
- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs/mo) of non-acute hazardous waste.
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities in 2-10.

Y ☐ N ☑ **2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes," provide an explanation in the Comments section.

Y ☑ N ☐ **3. United States Importer of Hazardous Waste**

Y ☐ N ☑ **4. Mixed Waste (hazardous and radioactive) Generator**

Y ☑ N ☐ **5. Transporter of Hazardous Waste**
If "Yes," mark all that apply.

- ☑ a. Transporter
- ☐ b. Transfer Facility (at your site)

Y ☑ N ☐ **6. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste Part B permit is required for these activities.

Y ☑ N ☐ **7. Recycler of Hazardous Waste**

Y ☑ N ☐ **8. Exempt Boiler and/or Industrial Furnace**
If "Yes," mark all that apply.

- ☐ a. Small Quantity On-site Burner Exemption
- ☑ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☑ **9. Underground Injection Control**

Y ☑ N ☐ **10. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.

Y ☑ N ☐ **1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes," mark all that apply.**

- a. Batteries ☑
- b. Pesticides ☐
- c. Mercury containing equipment ☐
- d. Lamps ☑
- e. Other (specify) _____ ☐
- f. Other (specify) _____ ☐
- g. Other (specify) _____ ☐

Y ☑ N ☐ **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

Y ☐ N ☑ **1. Used Oil Transporter**
If "Yes," mark all that apply.

- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)

Y ☐ N ☑ **2. Used Oil Processor and/or Re-refiner**
If "Yes," mark all that apply.

- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☑ **3. Off-Specification Used Oil Burner**

Y ☐ N ☑ **4. Used Oil Fuel Marketer**
If "Yes," mark all that apply.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

❖ You can ONLY Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
- you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y☐ N☑ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories **See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:**

☐ **a. College or University**

☐ **b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university**

☐ **c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university**

Y☐ N☑ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D039	D040	F001
F002	F003	F005	K069			

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☑ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes," you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
T.E.	Thomas Manne VP at NY Operations	2/12/24

Ecobat Resources

Permit Attachment A

Facility Layout Site Plan

EQUIPMENT LEGEND

1	KETTLE	29	PLASTIC DRYING SYSTEM
2	BW BALER	30	PLASTICS TRAILER PAN
3	FURNACE	31	SONIC SPRAY FEED TANK
4	BAGHOUSE	32	BAGHOUSE BLOWER
5	ROTARY DRYER	33	BATTERY CHARGING AREA
6	BATTERY WRECKER	34	MAIN GAS SHUT-OFF
7	MOTOR POOL	35	BOILER
8	STORAGE BINS	36	COMPRESSORS
9	OFFICE	37	HEAT EXCHANGER
10	LAB	38	CRYSTALLIZER VESSEL
11	SHOWER & EYE WASH STA.	39	SPRAY DRYER
12	EYE WASH ONLY	40	CHILLER
13	PLASTIC SYSTEM	41	C.E.M.
14	MOTOR CONTROL CENTER	42	SCRUBBER VESSEL
15	CASTING MACHINE	43	EMERGENCY BURN BLANKET
16	STACK	44	COKE HOPPER
17	DOCK	45	BW ACID SCRB SYS
18	NOT USED	46	MAYFRAN CONVEYOR
19	WASH STATION	47	WESP CELL
20	GANTRY CRANE	48	RTO
21	BOOT WASH/VACUUM STA.	49	PIG CAST. STACKER ROBOT
22	PROPANE VAPORIZER	50	ACID CLARIFIER
23	MAINTENANCE		
24	WELDING SHOP		
25	FILTER PRESS		
26	MAIN ELECTRIC SHUT-OFF		
27	COOLING TOWERS		
28	DILUTE SULFURIC ACID		

ENVIRONMENTAL LEGEND

EMISSION POINT REFERENCE

CHEMICAL LEGEND

ACL	ACETYLENE	LP	LIQUID PROPANE
ACT	ACETONE	LR	MISC. LAB REAGENTS
AL	ALUMINUM	MA	METALLIC ANTIMONY
BOR	BORAX	MAS	METALLIC ARSENIC
BR	BROMINE	MGS	MISCELLANEOUS GAS
CA	CALCIUM	MO	MISCELLANEOUS OIL
CAL	CALCIUM ALUMINUM ALLOY	MOR	MORTARS
CAM	METALLIC CALCIUM	MS	METALLIC SODIUM
CIB	CAST IRON BORINGS	NL	LIQUID NITROGEN
CK	COKE	NHS	NON-HAZARDOUS SLAG
COS	COBALT SULFATE	OXL	LIQUID OXYGEN
CS	CAUSTIC SODA	OXC	COMPRESSED OXYGEN
CSL	LIQUID CAUSTIC SODA	PET	OIL, GREASE OR KEROSENE
CU	COPPER	RP	RED PHOSPHORUS
D	DIESEL FUEL	REF	REFRACTORY MATERIALS
DEF	DIESEL EXHAUST FLUID	RVS	REVERB SLAG
DLM	DOLOMITIC LIME	S	SULFUR
DSL	DOSSLITE	SCL	SODIUM CHLORIDE
FC	FIRE CLAY	SA	SODA ASH (POWDERED)
FS	FERRIC SULFATE	SEL	SELENIUM
HCL	HYDROCHLORIC ACID	SRS	SRF SLAG
HYP	HYDROGEN PEROXIDE	SN	SODIUM NITRATE
HZS	HAZARDOUS SLAG	SS	SODIUM SULFATE
IPY	IRON PYRITE	SUA	SULFURIC ACID
KOH	CAUSTIC POTASH	TAR	ROOFING TAR
LI	LITHIUM	TIN	TIN
LM	PEBBLE LIME	TSP	TRISODIUM PHOSPHATE

FIRE & SAFETY LEGEND

ABOVE GROUND TANK	FENCE/BARRIER	ACID — ACID STORAGE
AC — AIR CONDITIONING CONTROLS	GUARD STATION	CRY — CRYOGENIC
CO — CARBON MONOXIDE DETECTOR	GAS SHUT-OFF	E/S — EVACUATION/STAGING AREAS
E — ELECTRICAL PANEL (SEE ALSO 14)	MANHOLE – SANITARY SEWER	FLA — FLAMMABLE
EMERGENCY LIGHT	OVERHEAD WIRE	GAS — GAS
FAP — FIRE ALARM PANEL	RAILROAD TRACK	LIQ — LIQUID
F — FIRE ALARM PULL STATION	SIGN	OXI — OXIDIZER
FIRE HYDRANT	SD — SMOKE DETECTOR	PYR — PYROPHORIC
FIRE EXTINGUISHER-DRY CHEMICAL	WATER SHUT-OFF	SLD — SOLID
FIRE EXTINGUISHER-CO^2	M — MONITORING WELL	TR — TRANSFORMER
FIRE EXTINGUISHER-CLASS D	CLEAN UP KIT	W — WATER REACTIVE
	E — EXTRACTION WELL	

REVISIONS

8/4/23	ADDED: DEF, COMPACTOR, DUST, SILO UPGRADE, MOBILE EQ	CD
7/26/2023	MOVED SODIUM TRAILER LOCATION	CD
2/18/2022	ADDED PELLETIZER BUILDING	CC
1/15/2021	UPDATED CHEMICAL LOCATIONS	CC
5/18/2020	ADD MOBILE EQUIP, WOOD AND SPARE PARTS STORAGE	LDM
2/27/2020	ADD ACID SCRB, GANTRY CRANE, REM TSP FP	CC

FOR OLDER REVISIONS, SEE DWG FIRESAFETY_PLAN REV 2016-02-09

JOB NO. / FILE NO. 97003.47 SCALE: 1" = 40' DATE: FEBRUARY 23, 2012

TITLE: SITE PLAN

PROJECT: SITE PLAN
ECO BAT NEW YORK, LLC
65 BALLARD ROAD, MIDDLETOWN, NY 10941
WALLKILL (T), ORANGE COUNTY, NY. SECTION 41, BLOCK 1
LOTS 70.21, 70.22, 70.23, 71.22, 73.1, 73.22

T. M. DEPUY
ENGINEERING & LAND SURVEYING, P.C.
2565 ROUTE 302, MIDDLETOWN, NEW YORK 10941
PHONE: (845) 361-5421 FAX: (845) 361-5229

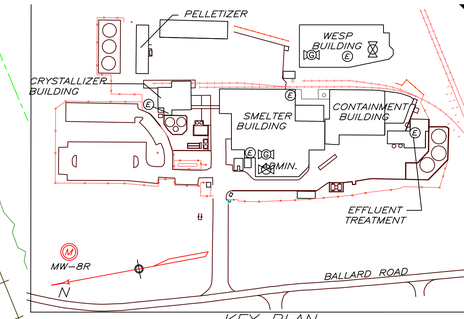
DWG. FS1

SHEET 1 OF 1

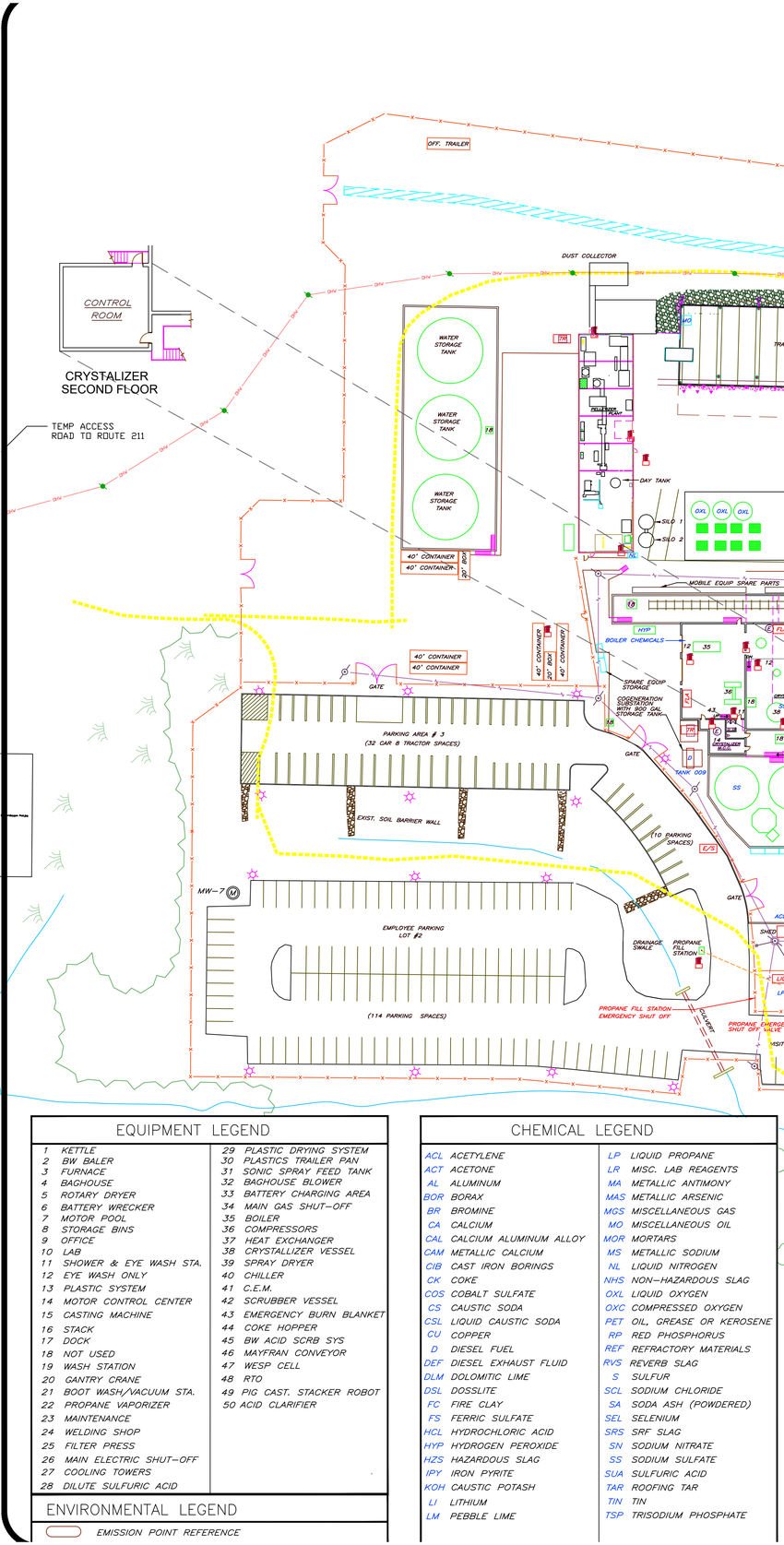
Ecobat Resources

Permit Incorporated Document #2

Operations Plan Appendix 1-B Site Map



KEY PLAN



EQUIPMENT LEGEND

1	KETTLE	29	PLASTIC DRYING SYSTEM
2	BW BALER	30	PLASTICS TRAILER PAN
3	FURNACE	31	SONIC SPRAY FEED TANK
4	BAGHOUSE	32	BAGHOUSE BLOWER
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12	EYE WASH ONLY	40	CHILLER
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22	PROPANE VAPORIZER	50	ACID CLARIFIER
23	MAINTENANCE		
24	WELDING SHOP		
25	FILTER PRESS		
26	MAIN ELECTRIC SHUT-OFF		
27	COOLING TOWERS		
28	DILUTE SULFURIC ACID		

ENVIRONMENTAL LEGEND

EMISSION POINT REFERENCE

CHEMICAL LEGEND

ACL	ACETYLENE	LP	LIQUID PROPANE
ACT	ACETONE	LR	MISC. LAB REAGENTS
AL	ALUMINUM	MA	METALLIC ANTIMONY
BOR	BORAX	MAS	METALLIC ARSENIC
BR	BROMINE	MGS	MISCELLANEOUS GAS
CA	CALCIUM	MO	MISCELLANEOUS OIL
CAL	CALCIUM ALUMINUM ALLOY	MOR	MORTARS
CAM	METALLIC CALCIUM	MS	METALLIC SODIUM
CIB	CAST IRON BORINGS	NL	LIQUID NITROGEN
CK	COKE	NHS	NON-HAZARDOUS SLAG
COS	COBALT SULFATE	OXL	LIQUID OXYGEN
CS	CAUSTIC SODA	OXC	COMPRESSED OXYGEN
CSL	LIQUID CAUSTIC SODA	PET	OIL, GREASE OR KEROSENE
CU	COPPER	RP	RED PHOSPHORUS
D	DIESEL FUEL	REF	REFRACTORY MATERIALS
DEF	DIESEL EXHAUST FLUID	RVS	REVERB SLAG
DLM	DOLOMITIC LIME	S	SULFUR
DSL	DOSSLITE	SCL	SODIUM CHLORIDE
FC	FIRE CLAY	SA	SODA ASH (POWDERED)
FS	FERRIC SULFATE	SEL	SELENIUM
HCL	HYDROCHLORIC ACID	SRS	SRF SLAG
HYP	HYDROGEN PEROXIDE	SN	SODIUM NITRATE
HZS	HAZARDOUS SLAG	SS	SODIUM SULFATE
IPY	IRON PYRITE	SUA	SULFURIC ACID
KOH	CAUSTIC POTASH	TAR	ROOFING TAR
LI	LITHIUM	TIN	TIN
LM	PEBBLE LIME	TSP	TRISODIUM PHOSPHATE

FIRE & SAFETY LEGEND

ABOVE GROUND TANK	FENCE/BARRIER	ACID STORAGE
AIR CONDITIONING CONTROLS	GUARD STATION	CRYOGENIC
CARBON MONOXIDE DETECTOR	GAS SHUT-OFF	EVACUATION/STAGING AREAS
ELECTRICAL PANEL (SEE ALSO 14)	MANHOLE – SANITARY SEWER	FLAMMABLE
EMERGENCY LIGHT	OVERHEAD WIRE	GAS
FIRE ALARM PANEL	RAILROAD TRACK	LIQUID
FIRE ALARM PULL STATION	SIGN	OXIDIZER
FIRE HYDRANT	SMOKE DETECTOR	PYROPHORIC
FIRE EXTINGUISHER–DRY CHEMICAL	WATER SHUT-OFF	SOLID
FIRE EXTINGUISHER–CO^2	MONITORING WELL	TRANSFORMER
FIRE EXTINGUISHER–CLASS D	CLEAN UP KIT	WATER REACTIVE
	EXTRACTION WELL	

8/4/23	ADDED: DEF, COMPACTOR, DUST, SILO UPGRADE, MOBILE EQ	CD
7/26/2023	MOVED SODIUM TRAILER LOCATION	CD
2/18/2022	ADDED PELLETIZER BUILDING	CC
1/15/2021	UPDATED CHEMICAL LOCATIONS	CC
5/18/2020	ADD MOBILE EQUIP, WOOD AND SPARE PARTS STORAGE	LDM
2/27/2020	ADD ACID SCRB, GANTRY CRANE, REM TSP FP	CC

FOR OLDER REVISIONS, SEE DWG FIRESAFETY_PLAN REV 2016-02-09

REVISIONS

JOB NO. 97003.47
FILE NO.
SCALE: 1" = 40'
DATE: FEBRUARY 23, 2012

TITLE: SITE PLAN

PROJECT: SITE PLAN

ecobat RESOURCES
ECO BAT NEW YORK, LLC
65 BALLARD ROAD, MIDDLETOWN, NY 10941
WALLKILL (T), ORANGE COUNTY, NY. SECTION 41, BLOCK 1
LOTS 70.21, 70.22, 70.23, 71.22, 73.1, 73.22

T. M. DEPUY
ENGINEERING & LAND SURVEYING, P.C.
2565 ROUTE 302, MIDDLETOWN, NEW YORK 10941
PHONE: (845) 361-5421 FAX: (845) 361-5229

DWG. FS1

SHEET 1 OF 1

Ecobat Resources

Permit Incorporated Document #4

Security and Facility Inspection Plan

Appendix 3B

65 Ballard Road
Middletown NY 10941

HAZARDOUS WASTE WEEKLY INSPECTION

Date: _____ Time Started: _____

If the answer to any of the questions below is "No", indicate the problem or potential problem in Comments or Corrective Action Items. Immediate corrective action must be taken and the status of those actions (short term and/or long term) must be noted on each successive inspection checklist/log until the corrective action is completed.

Please update last week's form for status of corrective actions resulting from previous inspection
Inspections must occur ≤7 days apart.

I. Central Accumulation Storage Areas

A. Roll-Offs in Trailer Lot	**Yes**	**No**
a) Containers closed	_____	_____
b) Containers in good condition	_____	_____
c) Containers intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____
e) Warning sign(s) present and readable	_____	_____
f) Accumulation start dates less than 60 days ago?	_____	_____

B. Hazardous Plastic Trailer Storage Area (East)	**Yes**	**No**
a) Containers closed	_____	_____
b) Containers in good condition	_____	_____
c) Containers intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____
e) Warning sign(s) present and readable	_____	_____
f) Accumulation start dates less than 60 days ago?	_____	_____

C. Spray Dryer Collection Bin at Crystallizer	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____
e) Warning sign(s) present and readable	_____	_____
f) Accumulation start dates less than 60 days ago?	_____	_____

D. Spray Dryer Bins – in Trailer Lot	**Yes**	**No**
a) Containers closed	_____	_____
b) Containers in good condition	_____	_____
c) Containers intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____
e) Warning sign(s) present and readable	_____	_____
f) Accumulation start dates less than 60 days ago?	_____	_____

E. Hazardous Plastic trailer storage area (West)	**Yes**	**No**
a) Containers closed	_____	_____
b) Containers in good condition	_____	_____
c) Containers intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____
e) Warning sign(s) present and readable	_____	_____
f) Accumulation start dates less than 60 days ago?	_____	_____

II. Satellite Accumulation Areas

A. EHS Office **EHS - Office**	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

B. Sanitation - Respirator Wash Area	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

C. Sanitation Laundry – Washing Machine Area	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

D. QC Laboratory - ICP Room Trash	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

E. QC Laboratory - ICP Room Aluminum Waste	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

F. QC Laboratory - ICP Room Nitric Acid Waste	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

G. QC Laboratory - Sample Prep Room Trash	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

H. QC Laboratory – Sample Prep. Room - Used Plastics	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

I. QC Laboratory DR Room Trash	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

Initials_____

J. Sanitation - Dirty Clothes Locker Room - North	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

K. Sanitation - Dirty Clothes Locker Room – South	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

L. Sanitation – Hat Room – Used PPE/Uniforms	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

M. Sanitation - Hat Room	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

N. Sanitation - Wash Room	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

O. Refinery - Glove Repository at west wall	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

P. Refinery Plant Trash (K8)	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

Q. Maintenance Machine Shop	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

R. Main MCC Room	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

S. Maintenance Welding Shop	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

T. Iron Workers Shop	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

U. Motor Pool Tool Room	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

V. Motor Pool - Used Oil Absorbent Drums	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) **Proper container labeling**	_____	_____

W. Motor Pool Trash Collection	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

X. Refinery – Strapping Station	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

Y. Aerosol Spray Can Collection (near Shipping Dock)	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

Z. Shipping Dock Trash Collection	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

AA. Refinery Manual Strapping Station	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

Initials_____

BB. Refinery Maintenance Shop	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

CC. Used Refractory Bin in Furnace horseshoe area	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

DD. SRF Feed Plant Trash	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) **Proper container labeling**	_____	_____

EE. Battery Wrecker Yard (next to plastic/cardboard Bundling station stairs	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) **Proper container labeling**	_____	_____

FF. Scrubber Office	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

GG. ETP Office	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

HH. ETP Maintenance Shop	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

II. ETP Filter Press Mud	**Yes**	**No**
a) Containers closed	_____	_____
b) Containers in good condition	_____	_____
c) Containers intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

JJ. Fluorescent bulb storage (SRF Compressor MCC Room)	**Yes**	**No**
a) Containers closed	_____	_____
b) Containers in good condition	_____	_____
c) Containers intact (No spills or leaks)	_____	_____
d) All containers labeled “Universal Waste Lamps For Recycling” On a Universal waste sticker?	_____	_____

Initials_____

KK. Baghouse South Conex	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

LL. Crystallizer Office	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

MM. Crystallizer Restroom	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

NN. _____	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

OO. _____	**Yes**	**No**
a) Container closed	_____	_____
b) Container in good condition	_____	_____
c) Container intact (No spills or leaks)	_____	_____
d) Proper container labeling	_____	_____

Comments_____

Corrective Action Items	Corrective Actions – Date Completed
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

III. Security Systems

	Yes	**No**
1. Is outer fence intact?	___	___
2. Is the fence closed and locked properly?	___	___
3. Is the Camera System* operating properly?	___	___

*Camera system indicates that the software is functioning and does not imply that every camera is operational. This item will be verified through a check of three random cameras.

Corrective Action Items	Corrective Actions – Date Completed
_____	_____
_____	_____

IV. Production Building and Finished Goods Warehouse

	Yes	No
Building Interior and Exterior:		
1. Is the enclosure free of significant cracks, gaps, corrosion, and other deterioration that could cause lead bearing material to be released?	___	___
2. Are measures in place to prevent the tracking of lead bearing material to the exterior?	___	___
3. Are there clear warning signs on exterior doors? (Not dirty and able to be seen?)	___	___

Corrective Action Items — Corrective Actions – Date Completed

_____ _____

_____ _____

V. Hazardous Waste (Battery) Storage Area (Central Accumulation Area)

	Yes	No
A. Drums, Boxes and other Containers:		
1. Are all containers closed and capped?	___	___
2. Are all containers in good condition*? (No severe dents, cracks, splits or corrosion?)	___	___
3. Are all containers intact* (no leaks or spills**)?	___	___
4. Are all containers covered?	___	___
5. Are pallets intact and properly sized?	___	___
6. Are all containers labeled with appropriate hazardous or universal waste stickers showing the accumulation date?	___	___
7. Are Universal Waste batteries labeled with the words “Used Batteries”, “Waste Batteries”, or “Universal Waste-Batteries”?	___	___
8. Check dates for one year expiration?	___	___
9. Number of containers within 2 months limit: _____		
10. Are all “Pending Analysis” labels less than 30 days old? Check if not present: ____	___	___
B. Storage:		
1. Total Volume does not exceed permitted volume.	___	___
2. Waste codes and container types are in permit compliance?	___	___
3. Does the storage of different waste codes follow permit conditions (i.e., incompatible wastes are not stored together)?	___	___
4. Are all containers in an upright position?	___	___
5. Are all containers stacked in a manner which allows adequate aisle space for inspection around and through the area?	___	___
6. Are containers stacked in a manner to ensure safety and stability?	___	___
7. Are Warning Signs present and legible?	___	___
8. Lithium batteries are stored in designated fire resistant cabinets and stored in a manner to prevent short circuiting.	___	___
C. Secondary Containment Pad:		
1. Is the surface, walls and berms free of cracks?	___	___
2. Is the surface clean (free of debris)?	___	___
3. Is the surface free of standing water?	___	___
4. Is the surface free of spills or leaks?	___	___
5. Is the surface coating intact (no signs of wear)?	___	___
D. Secondary Containment System:		
1. Is the run-off/spill containment system intact? (No signs of wear or cracks?)	___	___

2. Is the sump clean and clear and operating properly? ___ ___

Comments_____

Corrective Action Items	Corrective Actions – Date Completed
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

* Any broken batteries must be moved to an enclosure immediately upon discovery.
** Residue from broken batteries must be cleaned immediately upon discovery.

VI. Containment Building

		Yes	No
A.	**Building Interior:**		
1.	Is each container storage area or pile in the correct location and meets applicable limits on total volume?	___	___
2.	Maintaining ten-foot buffer on storage piles from doors?	___	___
3.	Maintain the height of the feed piles and secondary materials so that no material from such piles make contact with any of the fabricated corrugated metal walls and no portion of a pile within ten feet of an exterior concrete containment wall shall exceed the height of the push wall(s)	___	___
4.	Proper storage of waste containers?	___	___
5.	Is the primary barrier free of significant gaps or holes?	___	___
6.	Hazardous waste fully contained (not leaking)?	___	___
7.	Is the surface free of standing water?	___	___
8.	Are hazardous waste bins (slag, mud, etc.) labeled?	___	___
B.	**Sump Operation**		
1.	Sump is operating and free of debris?	___	___
2.	Is the sump free of standing liquid?	___	___
C.	**Leak Detection System:**		
1.	Is the leak detection system operational?	___	___
2.	Are all cells free of leaks or fault conditions?	___	___
	If no, are response procedures being implemented?	___	___
D.	**Building Exterior:**		
1.	Is the foundation free of significant cracks?	___	___
2.	Is the foundation free of all signs of a release (liquid or solid)?	___	___
3.	Is the building labeled? "HAZARDOUS WASTE CONTAINMENT BUILDING"	___	___
4.	Are there clear warning signs on all exterior doors? "DANGER – UNAUTHORIZED PERSONNEL KEEP OUT" (Not dirty and able to be seen?)	___	___
E.	**Ventilation System**:		
1.	Are the Ventilation units operational?	___	___
2.	Is there inward flow of draft to the Containment Building?	___	___

Comments_____Corrective Action Items
Corrective Actions – Date Completed

_____ _____
_____ _____
_____ _____
_____ _____

VII. Truck & Trailer Parking Lot, Truck Fueling Station, and Pallet Storage

		Yes	No
1.	Are trucks and trailers parked safely?	___	___
2.	Are all materials properly loaded and contained in the trailer? (i.e., no evidence of leakage from trailers or fuel spillage)	___	___
3.	Is the pavement and surrounding area clean? (No signs of fuel or other liquid spillage?)	___	___
4.	Is the Diesel Fuel Station clean?	___	___
5.	Are Pallets stacked neatly?	___	___
6.	Are Pallets stacked away from water drippings?	___	___

Corrective Action Items — Corrective Actions – Date Completed

_____ _____
_____ _____

VIII. Covered Trailer Parking Area

		Yes	No
1.	Is the surface free of cracks?	___	___
2.	Is the surface clean (free of debris)?	___	___
3.	Is the surface free of standing water?	___	___
4.	Is the surface free of spills or leaks?	___	___
5.	Are catwalks in satisfactory condition (free of deterioration)?	___	___
6.	Is the containment sump clean and clear?	___	___

Corrective Action Items — Corrective Actions – Date Completed

_____ _____
_____ _____

Affirmation

		Yes	No
1.	Previous inspection corrective actions are updated.	___	___
2.	I affirm that this inspection is complete and accurate to the best of my knowledge.	___	___

_____ _____
Printed Inspector Name — Inspector Signature

_____ _____
Date — Inspection Completion Time

This completed inspection checklist/log must be filed with the Weekly Hazardous Waste Inspection Forms in the Compliance Library.

Vehicle Wash Logs

As part of the weekly inspection, please ensure that the Vehicle Wash Logs at the Iron Worker / Mobile Equipment Overhead Door are collected and turned in to the environmental manager for review and signature prior to being turned in to compliance.

		Yes	No
1.	Vehicle Wash Logs Collected	___	___
2.	Vehicle Wash Logs Re-stocked	___	___

Note: Ensure there are plenty of blank logs for the upcoming week.

Ecobat Resources

Permit Incorporated Document #5

Personnel Training Plan

Appendix 4A

65 Ballard Road
Middletown NY 10941

40 HOUR NEW EMPLOYEE TRAINING REQUIRED
ALL HOURLY & SALARIED PERSONNEL

DAY 1

Employee Statement of Training Received

The training topics listed below are specific sections of the overall training program for Day I.

I have received instructions and training in reference to the equipment or materials listed below:

TOPICS:		Employee Initials
Revere Introduction. "*Who we are & What we do*" *(ppt)*	X	
Employee Lead, Arsenic, Silica and Cadmium Standard *(29 CFR 1910.1025, 1910.1018, 1910.1027)*	X	
Hazard Communication Standard – "Acids and Caustics" *(29 CFR 1910.1200)*	X	
Respirator Standard – Air Purifying Respirators *(29 CFR 1910.134)*	X	
Employee Training OSHA Hearing Conservation Program *(29 CFR 1910.95)*	X	
Hazard Communication Standard–"Right to Know"–GHS-Understanding SDS's (29 CFR 1910.1200)	X	
* Employee Training RCRA – Hazardous Waste Incident Response *(40 CFR Part 260-273)*	X	
* Employee Training RCRA - Pollution Prevention, Universal Waste & Hazardous Waste Training *(40 CFR Part 260-273)*	X	
Employee Environmental Compliance and Awareness *(40 CFR 273.36)*	X	
Employee Training for Environmental Incident Reporting *(40 CFR 112)*	X	
Employee Training on Oil Spill Prevention, SPCC Program & Site-Specific Presentation *(40 CFR 112)*	X	
* Employee Training in Pollution Prevention & Hazardous Waste Reduction *(40 CFR 262, 6NYCRR373)*	X	
Employee Training in Storm Water Pollution Prevention *(40 CFR 122)*	X	
EPA Containment Building Review	X	
Employee General Safety Training - Emergency Preparedness Plan - Fire Extinguisher	X	
(Operation, Uses and Types) *(29 CFR 1910.38, 1910.155, 1910.157)*	X	
Employee General Training – Bloodborne Pathogens *(29 CFR 1910.1030)*	X	
Employee General Safety Training – Slips/Trips/Falls	X	
Powered Industrial Truck Operator Training – Classroom	X	

Instruction for the proper use, care, and handling of the above listed items has been explained to me. I have been instructed to notify my Supervisor or the Safety Office should any problems arise. I have initialed each item above for which I have received training.
* This is to certify that the employee named below has received 24-hour training in Hazardous Waste Operations and has a general awareness of their responsibilities in accordance with OSHA 1910.120.
** All training is conducted at Ecobat, 65 Ballard Rd., Middletown N.Y., 10941
***ISO training shall not be removed from this syllabus without approval from each Management System owner.

Employee's Name	***(last Four Digits) Social Security Number***
Employee's Signature	***Date***
Training Approved by: Jason Iorio	***Title: Safety Manager***
Instructor's Name & Signature	***Date***

ecobat RESOURCES

65 Ballard Road
Middletown NY 10941

40 HOUR NEW EMPLOYEE TRAINING REQUIRED
ALL HOURLY & SALARIED PERSONNEL

DAY 2

Employee Statement of Training Received

The training topics listed below are specific sections of the overall training program for Day 2.

I have received instructions and training in reference to the equipment or materials listed below:

TOPICS:			Employee Initials
Employee General Safety Training – Basic Electrical Hazards *29 CFR 1910.303, NFPA 70E*	(ppt)(v)	X	
Employee General Safety Training – Preventing Electrical Accidents *29 CFR 1910.333, NFPA 70E*	(ppt)(v)	X	
Employee General Safety Training - Arc Flash Awareness *29 CFR 1910.333, NFPA 70E*	(v)	X	
Employee General Safety Training – Lockout/Tagout Procedures *29 CFR 1910.147*	(v)	X	
* Employee Training DOT Hazardous Material Training (*Non-Driver*) *49 CFR 172.704*	(ppt)	X	
* Employee Training for General Security and Site-Specific Security *6 CFR27.255*	(ppt)	X	
Employee General Safety Training – Fall Protection Systems 29 CFR 1910.22-30, 66-68	(L)	X	
Employee Training – Conveyor Safety *ANSI/CEMA 350, 401, 402, 403, 404, 405, 406 -2003*	(v)(L)	X	
Employee General Safety Training – Confined Space Entry & Procedures *29 CFR 1910. 146*	(v)(L)	X	
Employee Training Respirator Safety – Atmosphere Supplying Respirators *29 CFR 1910. 134*	(v)	X	
Employee General Safety Training – Overhead Crane Safety *29 CFR 1910.179*	(v)	X	
Employee General Safety Training – Slings and Riggings *29 CFR 1910.184*	(v)	X	
Employee General Safety training – Oxy/Acetylene Gas Safety *29 CFR 1910.102*	(v)	X	
Employee General Safety Training – Danger Gas Under Pressure *29 CFR 1910.101*	(v)	X	

Instruction for the proper use, care, and handling of the above listed items has been explained to me. I have been instructed to notify my Supervisor or the Safety Office should any problems arise. I have initialed each item above for which I have received training.
* This is to certify that the employee named below has received training regarding Department of Transportation regulations and has a general awareness of their responsibilities in accordance with 49 CFR 172.700 – 172.704.
** All training is conducted at Ecobat, 65 Ballard Rd., Middletown N.Y., 10941

Employee's Name	***(last Four Digits) Social Security Number***
Employee's Signature	***Date***
Training Approved by: Jason Iorio	***Title: Safety Manager***
Instructor's Signature	***Date***

ecobat RESOURCES

65 Ballard Road
Middletown NY 10941

40 HOUR NEW EMPLOYEE TRAINING REQUIRED
ALL HOURLY & SALARIED PERSONNEL

DAY 3

Employee Statement of Training Received

The training topics listed below are specific sections of the overall training program for Day 3.

I have received instructions and training in reference to the equipment or materials listed below:

TOPICS:			Employee Initials
Employee General Safety Training – Occupational Heat Stress *ISO 7243:1989*	*(v)*	X	
Employee General Safety Training – On-the-Job Housekeeping *29 CFR 1910.22*		X	
Employee General Safety Training – Danger Zone Your Hands *29 CFR 1910.138*		X	
Employee General Safety Training – Hand and Eye Safety "The Convincer"		X	
Employee General Safety Training Ladder Safety/Inspections *29 CFR 1910.23*		X	
Machine Shop Tools & Powered Portable Hand Tool Training *29 CFR 1910.242*		X	
Employee General Safety Training - Portable Grinder Safety		X	
Employee General Safety Training – Water-Jel Burn Blankets	*(v)*	X	
Employee General Training – ISO 9001 Overview	*(v)*	X	
Employee General Training – ISO 14001 Overview	*(v)*	X	
Employee General Training – ISO 45001 Overview	*(v)*	X	
Issue Employee Personal Protective Equipment and review donning and use	*(L)*	X	
Employee General Safety Training – Safe Lifting & Back Injury Prevention	*(v)*	X	
Employee General Safety Training – Active Shooter Training *(v)*		X	
Employee Training Mentor Program	*(L)*	X	

Instruction for the proper use, care, and handling of the above listed items has been explained to me. I have been instructed to notify my Supervisor or the Safety Office should any problems arise. I have initialed each item above for which I have received training.
** All training is conducted at Ecobat, 65 Ballard Rd., Middletown N.Y., 10941

Employee's Name ***(last Four Digits) Social Security Number***

Employee's Signature ***Date***

Training Approved by: Jason Iorio ***Title: Safety Manager***

Instructor's Name & Signature ***Date***

ecobat RESOURCES

65 Ballard Road
Middletown NY 10941

40 HOUR NEW EMPLOYEE TRAINING REQUIRED
ALL HOURLY & SALARIED PERSONNEL

DAY 4

Employee Statement of Training Received

The training topics listed below are specific sections of the overall training program for Day 4.

I have received instructions and training in reference to the equipment or materials listed below:

TOPICS:			Employee Initials
Review Locker Room Procedures - Hands on		X	
Introduction to Senior Staff		X	
General Overview of Plant Policies Manual		X	
Employee General Training – Quality Policy Issued and Reviewed		X	
Issue New Employee Safety Equipment, Uniforms & Lockers		X	

Instruction for the proper use, care, and handling of the above listed items has been explained to me. I have been instructed to notify my Supervisor or the Safety Office should any problems arise. I have initialed each item above for which I have received training.
** All training is conducted at Ecobat, 65 Ballard Rd., Middletown N.Y., 10941

_____ _____
Employee's Name ***(last Four Digits) Social Security Number***

_____ _____
Employee's Signature ***Date***

Training Approved by: Jason Iorio ***Title: Safety Manager***

_____ _____
Instructor's Name & Signature ***Date***

ecobat RESOURCES

65 Ballard Road
Middletown NY 10941

40 HOUR NEW EMPLOYEE TRAINING REQUIRED

ALL HOURLY & SALARIED PERSONNEL

DAY 5

Employee Statement of Training Received

The training topics listed below are specific sections of the overall training program for Day 5.

I have received instructions and training in reference to the equipment or materials listed below:

TOPICS:		Employee Initials
Review Locker Room Procedures	*(HO)*	X _____
Behavior Based Safety Observation Training – Tour	*(HO)*	X _____
Completion of all Required Company and Union Documentation	*(L)*	X _____
Department Managers discuss schedules	*(L)*	X _____

Instruction for the proper use, care, and handling of the above listed items has been explained to me. I have been instructed to notify my Supervisor or the Safety Office should any problems arise. I have initialed each item above for which I have received training.
** All training is conducted at Ecobat, 65 Ballard Rd., Middletown N.Y., 10941

_____ _____
Employee's Name ***(last Four Digits) Social Security Number***

_____ _____
Employee's Signature ***Date***

Training Approved by: Jason Iorio ***Title: Safety Manager***

_____ _____
Instructor's Name & Signature ***Date***

65 Ballard Road
Middletown NY 10941

The following list contains all of the policies that have been gone over with me during my new Employee Orientation Training or during my Annual Refresher Training. My initials next to each of the policies indicates that I, _____ fully understand my responsibility for adhering to these policies and what the consequences are should I not comply with them.

Personal Cell Phone Policy HR-POL-008 _____

Environmental Health & Safety Policy RSR-GEN-POL-09 _____

New Employee Mentoring Program043-HR-POL-026 _____

Safety Environmental Regulations Accident Reporting Policy 043-SAF-POL-001 _____

Obtaining Medical Treatment of Work-Related Injuries or Illness 043-SAF-POL-002 _____

Crane Safety Policy 043-SAF-POL-003 _____

Safety Equipment Policy 043-SAF-POL-004 _____

General Safety Policies 043-SAF-POL-006 _____

Massive Slag or Lead Spill Policy 043-SAF-POL-007 _____

Dross Bin Policy 043-SAF-POL-008 _____

Trailer Safety Policy 043-SAF-POL-009 _____

Burner Pit Safety Policy 043-SAF-POL-010 _____

Safety Barricade 043-SAF-POL-011 _____

Red Phosphorus Handling Policy 043-SAF-POL-012 _____

Sodium Handling Policy 043-SAF-POL-013 _____

Barring the Lead Well Policy 043-SAF-POL-014 _____

Gas Torch Policy 043-SAF-POL-015 _____

Aerosol and Aluminum Can Re-Use and Disposal Policy 043-SAF-POL-016 _____

Reverb Hog Mold Safety Policy 043-SAF-POL-017 _____

Policy For Handling Radioactive Materials 043-SAF-POL-018 _____

Controlling Heat Stress Policy 043-SAF-POL-019 _____

Hog and Reject Lead Loading Policy 043-SAF-POL-020 _____

Dock Leveler Policy 043-SAF-POL-021 _____

Handling Sealed Drums Policy 043-SAF-POL-022 _____

Access to Energized Electrical Systems Policy 043-SAF-POL-023 _____

Personal Hygiene Rules and Procedures 043-SAF-POL-024 _____

Locker Room Practices Policy 043-SAF-POL-026 _____

General Hygiene and Housekeeping Policy 043-SAF-POL-027 _____

Annual Physical Policy 043-SAF-POL-029 _____

Smoking and Tobacco Policy 043-SAF-POL-030 _____

Hip Air & Air Line Respirator Procedure 043-SAF-POL-032 _____

Powered Industrial Truck Policy 043-SAF-POL-033 _____

Mobile Equipment Safety + Trip Tickets 043-SAF-POL-034+ 043-SAF-POL-035 _____

Trailer Safety Policy 043-SAF-POL-036 _____

Rail Car Movement Procedures 043-SAF-POL-037 _____

Vehicle Towing Standard Operating Procedure 043-SAF-POL-038 _____

Mobile Equipment Accident Reporting Policy 043-SAF-POL-039 _____

Mobile Equipment Traffic Policy & Procedures 043-SAF-POL-040 + 041 _____

Truck Driver Safety – Use of Spotter 043-SAF-POL-044 _____

Policy for Working Alone in Isolated Locations 043-SAF-POL-046 _____

Electrical Safety Policy 043-SAF-POL-047 _____

Used Oil Disposal Policy 043-ENV-POL-050 _____

Fluorescent Light Disposal 043-ENV-POL-051 _____

Used Tire Washing Procedure 043-ENV-POL-055 _____

Plant Negative Pressure and Alarm Response Policy 043-ENV-POL-056 _____

Baghouse Spillage Cleanup 043-ENV-POL-061 _____

Vehicle, Mobile Equipment, and Material Decontamination Policy 043-ENV-POL-085 _____

Blood Draw Policy 043-SAF-PRG-003 _____

Electrical Safety Program LOTO Program 043-SAF-PRG-180 _____

Fall Protection Program 043-SAF-PG-200 _____

Confined Space Entry Program 043-SAF-PRG-600 _____

Written Injury and Illness Program (Hot Work Program) 043-SAF-PRG-801 _____

_____ _____

Employee's Name **Date**

ecobat RESOURCES

65 Ballard Road
Middletown NY 10941

16 HOUR ANNUAL TRAINING REQUIRED
HOURLY & SALARIED PERSONNEL

DAY 1

Employee Statement of Training Received

The training topics listed below are specific sections of the overall training program for Day 1.

I have received instructions and training in reference to the equipment or materials listed below:

TOPICS:		Employee Initials
Employee Lead, Arsenic, Silica and Cadmium Standard *(29 CFR 1910.1025, 1910.1018, 1910.1027)*	X	
Hazard Communication Standard – "Acids and Caustics" *(29 CFR 1910.1200)*	X	
Respirator Standard – Air Purifying Respirators *(29 CFR 1910.134)*	X	
Employee Training OSHA Hearing Conservation Program *(29 CFR 1910.95)*	X	
Hazard Communication Standard–"Right to Know"–GHS-Understanding SDS's (29 CFR 1910.1200)	X	
* Employee Training RCRA – Hazardous Waste Incident Response *(40 CFR Part 260-273)*	X	
* Employee Training RCRA - Pollution Prevention, Universal Waste & Hazardous Waste Training *(40 CFR Part 260-273)*	X	
Employee Environmental Compliance and Awareness *(40 CFR 273.36)*	X	
Employee Training for Environmental Incident Reporting *(40 CFR 112)*	X	
Employee Training on Oil Spill Prevention, SPCC Program and Site-Specific Presentation *(40 CFR 112)*	X	
* Employee Training in Pollution Prevention & Hazardous Waste Reduction *(40 CFR 262, 6NYCRR373)*	X	
Employee Training in Storm Water Pollution Prevention *(40 CFR 122)*	X	
EPA Containment Building Review	X	
Employee General Safety Training - Emergency Preparedness Plan - Fire Extinguisher	X	
(Operation, Uses and Types) *(29 CFR 1910.38, 1910.155, 1910.157)*	X	
Employee General Training – Bloodborne Pathogens *(29 CFR 1910.1030)*	X	
Employee General Safety Training – Slips/Trips/Falls	X	
Powered Industrial Truck Operator Training – Classroom	X	

Instructions for the proper use, care, and handling of the above listed items have been explained to me. I have been instructed to notify my Supervisor or the Safety Office should any problems arise. I have initialed each item above for which I have received training.
* This is to certify that the employee named below has received training in Hazardous Waste Operations and has a general awareness of their responsibilities in accordance with OSHA 1910.120.
** All training is conducted at Ecobat, 65 Ballard Rd., Middletown N.Y., 10941

_____ _____
Employee's Name ***Social Security Number (Last 4 digits)***

_____ _____
Employee's Signature ***Date***

Training Approved by: Jason Iorio ***Title: Safety Manager***

_____ _____
Instructor's Name & Signature ***Date***

ecobat RESOURCES

65 Ballard Road
Middletown NY 10941

16 HOUR ANNUAL TRAINING REQUIRED
HOURLY & SALARIED PERSONNEL

DAY 2

Employee Statement of Training Received

The training topics listed below are specific sections of the overall training program for Day II.

I have received instructions and training in reference to the equipment or materials listed below:

TOPICS:			Employee Initials
Employee General Safety Training – Basic Electrical Hazards *(29 CFR 1910.303, NFPA 70E)*		X	
Employee General Safety Training – Preventing Electrical Accidents *(29 CFR 1910.333, NFPA 70E)*		X	
Employee General Safety Training - Arc Flash Awareness *(29 CFR 1910.333, NFPA 70E)*		X	
Employee General Safety Training – Lockout/Tagout Procedures *(29 CFR 1910.147)*		X	
Employee General Safety Training – Fall Protection Systems (29 CFR 1910.22-30, 66-68)		X	
Employee General Safety Training – Personal Protective Equipment (29 1910.132)		X	
Employee Training – Conveyor Safety *(ANSI/CEMA 350, 401, 402, 403, 404, 405, 406 -2003)*		X	
Employee General Safety Training – Confined Space Entry & Procedures *(29 CFR 1910. 146)*		X	
Employee Training Respirator Safety – Atmosphere Supplying Respirators *(29 CFR 1910.134)*		X	
Employee General Safety Training – Overhead Crane Safety *(29 CFR 1910.179)*		X	
Employee General Safety Training – Slings and Riggings *(29 CFR 1910.184)*		X	
Employee General Safety training – Oxy/Acetylene Gas Safety *(29 CFR 1910.102)*		X	
Employee General Safety Training – Danger Gas Under Pressure *(29 CFR 1910.101)*		X	
* Employee Training DOT Hazardous Material Training (*Non-Driver*) *(49 CFR 172.704)*		X	
* Employee Training for General Security and Site-Specific Security (*6 CFR27.255)*		X	
Employee General Safety Training – Proper Lifting Techniques and Workplace Ergonomics		X	
Employee General Safety Training – Portable Grinder Safety		X	
Hazard Communication Standard – Safe Handling of Liquid Caustic Soda		X	
Employee General Training - ISO 9001, 14001 and 45001 Overview	*(ppt)*	X	X
Employee Practical Safety Training – Behavior Based Safety		X	
Employee Practical Safety Training – Job Risk Assessment *(v)*		X	
Employee General Safety Training – Active Shooter Training			
General Overview of Plant Policies Manual		X	

Instructions for the proper use, care, and handling of the above listed items have been explained to me. I have been instructed to notify my Supervisor or the Safety Office should any problems arise. I have initialed each item above for which I have received training.

* This is to certify that the employee named below has received training regarding Department of Transportation regulations and their responsibilities in accordance with 49 CFR 172.704 a,1,2,3,4,5, Subpart H.

** All training is conducted at Ecobat, 65 Ballard Rd., Middletown N.Y., 10941

Employee's Name	***Social Security Number (Last 4 digits)***
Employee's Signature	***Date / Time***
Training Approved by: Jason Iorio	***Title: Safety Manager***
Instructor's Name and Signature	***Date***

65 Ballard Road
Middletown NY 10941

The following list contains all of the policies that have been gone over with me during my new Employee Orientation Training or during my Annual Refresher Training. My initials next to each of the policies indicates that I, _____ fully understand my responsibility for adhering to these policies and what the consequences are should I not comply with them.

Personal Cell Phone Policy HR-POL-008 _____

Environmental Health & Safety Policy RSR-GEN-POL-09 _____

New Employee Mentoring Program043-HR-POL-026 _____

Safety Environmental Regulations Accident Reporting Policy 043-SAF-POL-001 _____

Obtaining Medical Treatment of Work-Related Injuries or Illness 043-SAF-POL-002 _____

Crane Safety Policy 043-SAF-POL-003 _____

Safety Equipment Policy 043-SAF-POL-004 _____

General Safety Policies 043-SAF-POL-006 _____

Massive Slag or Lead Spill Policy 043-SAF-POL-007 _____

Dross Bin Policy 043-SAF-POL-008 _____

Trailer Safety Policy 043-SAF-POL-009 _____

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Handling Sealed Drums Policy 043-SAF-POL-022 _____

Access to Energized Electrical Systems Policy 043-SAF-POL-023 _____

Personal Hygiene Rules and Procedures 043-SAF-POL-024 _____

Locker Room Practices Policy 043-SAF-POL-026 _____

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Smoking and Tobacco Policy 043-SAF-POL-030 _____

Hip Air & Air Line Respirator Procedure 043-SAF-POL-032 _____

Powered Industrial Truck Policy 043-SAF-POL-033 _____

Mobile Equipment Safety + Trip Tickets 043-SAF-POL-034+ 043-SAF-POL-035 _____

Trailer Safety Policy 043-SAF-POL-036 _____

Rail Car Movement Procedures 043-SAF-POL-037 _____

Vehicle Towing Standard Operating Procedure 043-SAF-POL-038 _____

Mobile Equipment Accident Reporting Policy 043-SAF-POL-039 _____

Mobile Equipment Traffic Policy & Procedures 043-SAF-POL-040 + 041 _____

Truck Driver Safety – Use of Spotter 043-SAF-POL-044 _____

Policy for Working Alone in Isolated Locations 043-SAF-POL-046 _____

Electrical Safety Policy 043-SAF-POL-047 _____

Used Oil Disposal Policy 043-ENV-POL-050 _____

Fluorescent Light Disposal 043-ENV-POL-051 _____

Used Tire Washing Procedure 043-ENV-POL-055 _____

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Baghouse Spillage Cleanup 043-ENV-POL-061 _____

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Blood Draw Policy 043-SAF-PRG-003 _____

Electrical Safety Program LOTO Program 043-SAF-PRG-180 _____

Fall Protection Program 043-SAF-PRG-200 _____

Confined Space Entry Program 043-SAF-PRG-600 _____

Written Injury and Illness Program (Hot Work Program) 043-SAF-PRG-801 _____

_____ _____

Employee's Name **Date**

Ecobat Resources

Permit Incorporated Document #6

Integrated Contingency Plan

inclusive of Appendix K Plot Plan

INTEGRATED CONTINGENCY PLAN

ECOBAT RESOURCES NEW YORK, LLC
MIDDLETOWN, NEW YORK
[EPA ID NO. NYD030485288]

OCTOBER 2015

Revised August 2023

ECOBAT RESOURCES NEW YORK, LLC
NYSDEC PERMIT #3-3352-00145-00001-0
USEPA ID # NYD030485288

INTEGRATED CONTINGENCY PLAN
TABLE OF CONTENTS

INTEGRATED CONTINGENCY PLAN

This Integrated Contingency Plan (ICP or Plan) for the Ecobat Resources New York, LLC (Ecobat) facility is organized into three main sections: 1) Plan Introduction Elements; 2) Core Plan Elements; and 3) Ecobat Resources New York, LLC Emergency Preparedness Plan / Contingency Plan. The elements contained in these sections are accepted emergency response activities that are currently addressed in various forms in existing contingency planning regulations. The goal is to provide a mechanism to consolidate existing concepts into a single functional plan structure. This approach should provide a consistent basis for addressing emergency response concerns.

This Integrated Contingency Plan is incorporated by reference into the Part 373 Permit for the Ecobat facility. In the event that changes are made to the facility that affect the content of this plan, this plan will be updated in accordance with the requirements of Condition D of Module 1.

Section I - Plan Introduction Elements

The introduction section of this ICP is designed to provide facility response personnel, outside responders, and regulatory officials with basic information about the Plan and the entity it covers. It includes a statement of purpose and scope, information on the current revision date of the plan, general facility information, and the key contact(s) for plan development and maintenance.

1. Purpose and Scope of Plan Coverage

This Integrated Contingency Plan (ICP) has been prepared by Ecobat located at 65 Ballard Road in Middletown, New York to fulfill the spill prevention and emergency response requirements of the various federal and state regulations to which Ecobat is subject. A cross-reference matrix is provided for each of the applicable requirements. Specifically, the ICP is designed to comply with the following requirements:

Requirement	Acronym	Agency	Citation
Contingency Plan and Emergency Procedures	Contingency Plan (also HWCP)	New York State Department of Environmental Conservation	6 NYCRR Part 373-2.4
Emergency Action Plan, Emergency Response Program and Fire Prevention Plan	EAP	Occupational Safety and Health Administration	29 CFR 1910.38(a), 1910.119, 1910.120
Spill Prevention, Control and Countermeasure Plan	SPCC	United States Environmental Protection Agency	40 CFR Part 112
Contingency Plan and Emergency Procedures	Contingency Plan	United States Environmental Protection Agency	40 CFR Part 264, Subpart D, 40 CFR Part 265, Subpart D and 40 CFR 279.52
Emergency Planning and Notification		United States Environmental Protection Agency Emergency Planning and Community Right to Know Act	40 CFR Part 355

2. Current Revision Date

This ICP is maintained on-site and is available for review during normal working hours. The following table provides a brief summary of the revisions made to this ICP.

Revision Number	Revision Date	Revision Description
0	*October 2015*	*Creation of Original Publication - Integrated Contingency Plan for RCRA Permit Renewal Application*
1	*Revised December 2016*	*Revisions to address NYSDEC comments and facility updates*
2	*Revised May 2017*	Removed Emergency Notification List Contact
3	*Revised December 2017*	Updated Appendix G (Petroleum Storage Section) to include Cardboard and Stretch Wrap Baler; Add section 14.6 Decontamination Procedures for Acids and Caustics; Updated Emergency Notification List to include new Assistant Plant Manager
4	*Revised December 2020*	Updated Orange Regional to Garnet Health Medical Center; Updated Notification List to include new APM and Compliance Mgr. phone numbers for emergency services. Added new Flood Preparation Procedure. Updated section for agreements with emergency responders. Added Quick Reference Guide (Section III) and changed references in core plan from III to IV.
5	*Revised November 2021*	Updated Company Name, added overview for managing injuries and incidents, removed emergency contact
6	*Revised August 2022*	Updated Site contact list and footers
7	*Revised August 2023*	Updated header with current company logo (Ecobat), changed all references of Revere to Ecobat, updated Site Plan, Added 911 above notification list and updated titles of contacts. Removed reference to hardcopy SDSs.

3. General Facility Identification Information

a.	Facility name	Ecobat Resources New York, LLC
b.	Owner/operator/agent	Ecobat Resources US, LLC
c.	Physical address of the facility	65 Ballard Road, Middletown, Orange County, New York 10941 Lat/Long = 41.46081 / -74.3603739 Ecobat is located along the east side of Ballard Road between Route 211 and Crystal Run Road.
d.	Mailing address of the facility	EH&S Compliance Manager 65 Ballard Road, Middletown, New York 10941
e.	Other identifying information	USEPA Facility ID #NYD030485288 NYSDEC Facility ID #3-3352-00145 TRI Facility ID #10940RVRSMRD2BA SIC Code #3341 NAICS #331492 CBS Registration #3-000042 PBS Registration #3-448567
f.	Key contact(s) for plan development and maintenance	EH&S Compliance Manager
g.	Phone number(s) for key contact(s)	845-673-2225
h.	Facility phone number	845-692-4414
i.	Facility fax number	845-692-6121

The VP of Operations (Plant Manager) is in charge of the facility. Directors (Assistant Plant Managers) are responsible for the facility in the absence of the Plant Manager and report directly to the Plant Manager. The Primary Emergency Coordinator is the designated representative with the authority to commit the resources of the Corporation needed to carry out the provisions of the facility contingency plans. This authority also includes the responsibility to account for such

resources and the ability to delegate authority, in writing or otherwise subject to such limits as he deems available. In the absence of the Primary Emergency Coordinator, four Alternate Emergency Coordinators have been established. The EH&S Compliance Manager is the designated regulatory agency liaison.

Detailed information pertaining to the facility is provided in the Core Plan and Section IV including:

- Description of facility operations (Section IV, 3.0);
- Facility maps (Section IV, Appendix K);
- Facility drawings (Section IV, Appendix J); and
- Facility description/layout, including identification of facility hazards and vulnerable resources and populations on and off the facility which may be impacted by an incident (Section II, 5.0 and Section IV, 5.0 and 6.0).

Section II - Core Plan Elements

The Core Plan contains essential response guidance and procedures. Section IV, 9.0 contains more detailed supporting information on specific response functions.

1. Discovery

The discovery actions include those initial actions taken by personnel to recognize an incident, perform a basic assessment to mitigate circumstances if appropriate, and immediately notify the proper personnel to respond to the incident including necessary state or local agencies. All facility personnel are trained to recognize an incident.

Once an incident is recognized, employees will perform a basic assessment as described in Section IV, 9.0 to determine subsequent actions including but not limited to internal notifications, information gathering, evacuations and equipment shutdowns. The specific actions are detailed in the following sections:

- Internal notifications (Section IV, 7.0, 8.0, 9.0);
- Information gathering, (Section IV, 9.0);
- Evacuations (Section IV, 8.0, 9.0, 10.0); and
- Equipment shutdowns (Section IV, 9.0).

Spill prevention inspections are detailed in Ecobat's Security and Inspection Plan. In the event of a release of hazardous materials or wastes resulting from a spill or leak from a container or tank, the procedures outlined in Section IV, 9.3 will be followed. In general, the following steps will be taken:

- Control the release. Stop the flow of material if it can be performed safely;
- Remove potential ignition sources and materials in the areas that could be affected by the releases;
- Contain the release;
- Clean up the release and all associated residues;
- Prevent incompatible waste from being treated, stored or located in the affected areas until cleanup procedures are complete;
- Properly dispose or treat all collected released material; and
- Ensure that all emergency equipment listed in this ICP is cleaned and fit for its intended use before operations are resumed.

Specifically, if a leaking container is discovered, the emergency response procedures will be followed and may include placing the leaking container in an overpack container or stopping the leak and transferring the contents into a new container. Contaminated soil, if any, will be removed and placed in a properly labeled container. In the case of a leaking tank, the material will be contained in its containment dike. The standard emergency response procedures will be followed. If possible, the material will be recovered for reuse once the leak has been repaired. Absorbent materials will be utilized to soak up residual materials and then placed into properly labeled drums or containers. The diked area may be cleaned with water, which will then be transported off-site for proper disposal or processed through the facility's wastewater treatment plant.

In addition, other inspections are conducted by personnel in order to detect any discharges that may have taken place. These inspections are summarized in Ecobat's Security and Inspection Plan.

The facility also utilizes automated discharge detection systems in conjunction with the above-mentioned inspections conducted by facility personnel. These systems include the containment building floor liner leak detection system and two emergency generators that are equipped with a leak detection system and overfill alarms.

2. Initial Response

Procedures for internal and external notifications is discussed in Section IV, 7.0
Description of the response management team is discussed in Section IV, 7.0
Preliminary assessment is discussed in Section IV, 9.0
Procedures for specific scenarios are discussed in Section IV, 9.0

3. Sustained Actions

In the event of an emergency that triggers the implementation of this plan, Section 7.0, Section 8.0 and Section 9.0 address the response management structure from the initial emergency response through the sustained emergency response.

4. Termination and Follow-Up Actions

Emergency termination is discussed in Section IV, 9.0. Once any emergency is declared over, Ecobat will follow-up with an accident investigation, an informal critique of the response, review of any applicable plans and written follow-up reports (if required).

In the event of an incident at the facility, the following information will be documented and submitted for review upon request:

a) incident history (time, date, location, etc.);
b) notifications made;
c) emergency response personnel involved (name of organizations and times on-site)
d) agency personnel on-site (names of agencies and times on-site)
e) description of response actions;
f) cause(s) of the incident;
g) types of chemical(s) released and impacted media (e.g. soil, air, water);
h) quantity of chemicals released;
i) resources impacted (i.e. community, natural resources, etc.);
j) personnel/responder injuries; and
k) corrective actions and enforcement.

5. Environmentally and Economically Sensitive Areas Nearby

Ecobat is located in a commercial/industrial zone with a variety of commercial businesses located within a half mile of the facility including a large shopping mall located to the southwest of the facility. A medical corridor is located to the south and a hospital is approximately 1 ¼ miles to the southeast. The American Red Cross has a location 3/4 mile to the east.

Nearby transportation includes Route 211 to the north, Interstate 84 to the south, State Route 17 to the west and a freight and commuter railroad that runs directly adjacent to the Facility in an east/west direction.

The nearest residential areas are located a half mile to the north and a half mile to the south. A stream flows north to south across the western side of the facility and terminates into the Wallkill River approximately 1.5 miles to the south.

SECTION III
Ecobat Resources New York, LLC
Emergency Preparedness Plan / Contingency Plan

ECOBAT RESOURCES NEW YORK, LLC

65 BALLARD ROAD

MIDDLETOWN, N.Y. 10941

EMERGENCY PREPAREDNESS PLAN/ CONTINGENCY PLAN

QUICK REFERENCE GUIDE

Emergency Preparedness Plan / Contingency Plan – Quick Reference Guide

Ecobat Resources New York, LLC
65 Ballard Road
Middletown, NY 10941

40 CFR 262.262(b)(8) – Facility Emergency Coordinators

Ecobat Resources New York, LLC is a secondary lead smelting facility, which recycles lead-bearing materials. It operates three shifts 24 hours per day, seven days a week. The order of emergency contacts during an emergency follows:

In case of significant incident or injury – contact 911 Immediately.

Position	Name	Function	Office #	Cell Number
V.P. New York Operations	Thomas Mann	Primary Emergency Coordinator	(845) 673-2210	(845) 395-6179
Director	Brian Tigue	Alternate Emergency Coordinator	(845) 673-2260	(845) 551-4711
Director	Chris Hall	Alternate Emergency Coordinator	(845) 673-2257	(347) 467-0178
Safety Manager	Jason Iorio	Alternate Emergency Coordinator	(845) 673-2226	(845) 239-7708
EH&S Compliance Sr. Manager	Mark Hoffman	Alternate Emergency Coordinator	(845) 673-2225	(845) 239-3060

Overview - Managing Injuries and Incidents at Ecobat

- **If there is a significant incident or significant injury (head neck or spine injury, loss of consciousness, loss of body part, electric shock, explosion, fire beyond incipient stage) – call 911 immediately**
- For significant incidents or injuries, **anyone can call 911**.
- All truck drivers that are offsite must make a determination for urgent medical attention and call "911". If non-emergency medical treatment is required follow procedures for obtaining Medical Treatment for Work Related Injury and Illness 043-SAF-POL-002.
- The confined space rescue team (first aid trained personnel) are to be notified of all injuries requiring medical attention. The first aid trained personnel will apply patient assessment and initial first aid.
- The confined space team (first aid trained personnel) will be alerted to all such situations through a "Code Call" that will be announced via two-way radio. The "Code Call" will be a code "GREY" (the color of the confined space shirts).
- Either the Smelter Supervisors or the First Aid Trained Team Member onsite will make the assessment on initial first aid and the need for emergency medical care; they will make the determination if an ambulance is needed.
- During the onsite evaluation of an injured employee, two people will need to manage the employee's care. One Active – providing treatment of first aid and talking to the employee and one Passive – making all Emergency notification required phone calls such as senior plant management, corporate notification, department manager and safety.
- For any injury that requires offsite medical treatment, the Department manager / APM's / Safety are to respond to the site within 15 minutes or as soon as possible.
- Where possible, employees must be decontaminated prior to leaving the Site. This can be accomplished by taking a shower, changing out of company issued uniform, removing company boots and/or dressing in a Tyvek suit.
- All supervisors will be issued with a key to the first aid room. This is the location for the treatment of all employee injuries, where possible.
- Do not try to treat internally if injury or incident is beyond basic first aid.

- **Upon 911 notification of an emergency, the Emergency Coordinator (EC) should meet emergency services at the gate, identify themselves as the EC and provide information on the incident.**
    - **Only accurate information can be given to emergency responders (do NOT guess or speculate)**
    - **Assign other supervisors to make the necessary internal notifications**
- **EC should interact with Emergency Services; Smelter Supervisor is the EC when Upper Management are not at the plant until an EC arrives to relieve them.**
- **Guard shack should be used as the command post as this has SDS access, video access, Site plan, etc…**

40 CFR 262.262(b)(1), (2) & (3) – Waste Information

Name of Waste	Hazards	Maximum Amount Present	Special Treatment by Medical Personnel
Spent Lead Acid Batteries	Corrosive and Toxic (Lead, Arsenic, Barium)	3,500,000 lbs	The following measures are only applicable if exposure has occurred to components when a cell or battery leaks or is damaged: SKIN: Remove from source. Wash thoroughly with soap and water. Treat as acid burn. If battery electrolyte is splashed in shoes, remove immediately and discard. Remove contaminated clothing and obtain medical attention. EYES: Flush thoroughly with cool water for 15 minutes, lifting lids. Get medical attention. Treat as an acid burn. INHALATION: Remove to ventilated area. Get medical attention. INGESTION: Lead/lead compounds: consult physician. Battery Electrolyte: Do not induce vomiting, keep calm, and get medical attention immediately.

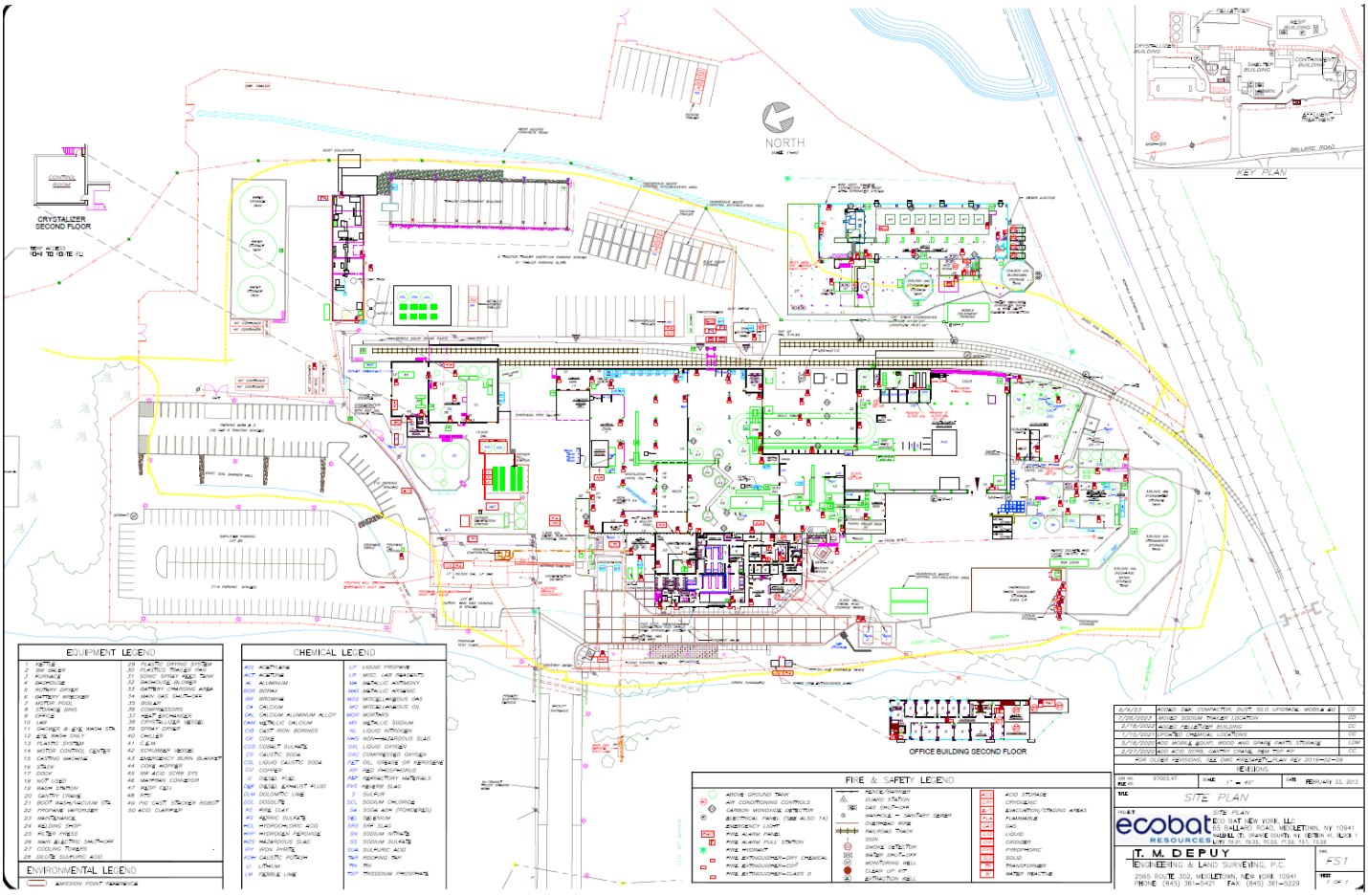
Lithium Batteries	Reactive, Ignitable	2,400 lbs	The following measures are only applicable if exposure has occurred to components when a cell or battery leaks or is damaged: Ingestion: Have victim rinse mouth thoroughly with water. DO NOT INDUCE VOMITING. Quickly transport victim to an emergency care facility. EYE: If eye contact with contents of an open cell occurs, immediately flush the contaminated eye(s) with water. Quickly transport victim to an emergency care facility. Skin Contact: Immediately flush with water. If irritation or pain persists, seek medical attention. Inhalation: Remove the patient from exposure into fresh air, seek medical attention.
Nickel Cadmium Batteries	Corrosive and Toxic (Cadmium)	15,000 lbs	The following measures are only applicable if exposure has occurred to components when a cell or battery leaks or is damaged: EYE CONTACT: Rinse immediately with large amounts of water and seek immediate medical attention/treatment. SKIN CONTACT: Rinse immediately with plenty of water and seek medical attention/treatment. INHALATION: Remove to fresh air, rinse mouth and nose with water and seek immediate medical attention/treatment. INGESTION: If the injured is fully conscious, clear mouth with water and afterwards drink plenty of water. DO not induce vomiting. Send immediately to hospital for medical attention/treatment.
Furnace Slag	Toxic (Lead, Arsenic, Barium)	100,000 lbs	If inhaled, remove to fresh air. In case of contact, immediately flush skin and/or eyes with plenty of water. Remove contaminated clothing and

			shoes. Wash clothing before reuse.
Sodium Sulfate Salt (Spray Dryer Solids)	Toxic (Cadmium, Selenium)	45,000 lbs	If inhaled, remove to fresh air. In case of contact, immediately flush skin and/or eyes with plenty of water. Remove contaminated clothing and shoes. Wash clothing before reuse.
Cardboard and Stretch Wrap	Corrosive and Toxic (Lead)	60,000 lbs	If inhaled, remove to fresh air. In case of contact, immediately flush skin and/or eyes with plenty of water. Remove contaminated clothing and shoes. Wash clothing before reuse.
Filter Press Mud (Scrubber and ETP)	Toxic (Cadmium, Lead)	60,000 lbs	In case of contact, immediately flush eyes with plenty of water
Used Refractory Brick	Toxic (Cadmium, Lead, Chromium)	150,000 lbs	If inhaled, remove to fresh air. In case of contact, immediately flush skin and/or eyes with plenty of water. Remove contaminated clothing and shoes. Wash clothing before reuse.
Used Aerosol Contents from Punctured Cans	Ignitable, Toxic	55 gallons	If swallowed: Immediately call a poison center/doctor. Do NOT induce vomiting. Rinse mouth. If on skin: Wash with plenty of water. If skin irritation occurs: Get medical attention. Take off contaminated clothing and wash before reuse. If inhaled: Remove person to fresh air and keep comfortable for breathing
Miscellaneous Waste Streams	Toxic	45,000 lbs	If inhaled, remove to fresh air. In case of contact, immediately flush skin and/or eyes with plenty of water. Remove contaminated clothing and shoes. Wash clothing before reuse.

40 CFR 262.262(b)(4), (6) & (7) – Appendix B - Plot Plan

Hazardous Waste generation, accumulation and treatment areas are demarcated on the Appendix K - Plot Plan.

Fire Hydrants are demarcated on the plot plan. There are three hydrants on-site. One hydrant is located at the facility entrance drive across from the guard shack. One hydrant is located on the southwest side of the WESP building and one hydrant is located on the northeast side of the WESP building.



A facility Evacuation/Fire Alarm System is maintained at the facility and is used to notify employees in the event of an emergency. The location of the fire alarm activation (pull stations) is identified in the facility plot plan in Appendix K. The fire alarm system is the primary communication medium for notifying employees that an emergency exists and the need to evacuate the facility. The Alarm consists of both an audible siren and a pre-recorded voice alert *(Attention Please evacuate the facility and proceed to your designated checkpoint).* Once the Evacuation Alarm System has been activated, evacuation is required. Additional

communications can be maintained via the plant two-way radio system or company issued cell phones that various personnel are equipped with depending on their job description (Emergency coordinators, department managers and supervisors, maintenance personnel). In addition, the facility has telephones located in all office areas.

Air horns are used to facilitate internal and emergency communication to better respond to localized emergencies. Emergency Air Horns have been located at satellite waste accumulation areas that are not located near a hardwired phone or base station radio. Additional air horns are located at various areas of the plant. Their primary function is to enable employees to immediately alert the plant when there is an emergency with one of our waste accumulation areas (ex: a spill requiring immediate attention). However, these air horns should also be used for any emergency situation when immediate help is required and other means of communication (e.g.: a radio) is unavailable.

The facility has a fire alarm system attached to the emergency fire sprinkler system in the office area. Fire alarms attached to the main risers are activated by water flow in the system. Fire alarm pull stations are located throughout the office area. The refinery baghouse has a dry trip sprinkler system. The WESP has a fire alarm system and sprinkler system. Lithium batteries are stored in fire rated exterior storage containers. These storage containers, identified on the Site plan, are equipped with an automatic fire alarm system. Class D fire extinguishers are located adjacent to these storage containers and adjacent to areas of the Facility where reactive metals are present.

40 CFR 262.262(b)(5) – Street Map of Facility

The major access surface streets to the facility are either Crystal Run Road or Route 211 to Ballard Road. In addition, the facility has access to several freeway systems which consist of New York State Route 211, New York State Route 17 and Interstate 84 approximately 1/2 mile south, Interstate Highway 10 approximately 3 miles north, and State Highway 605 approximately 3.5 miles west.

ECOBAT RESOURCES NEW YORK, LLC
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MIDDLETOWN, N.Y. 10941

EMERGENCY PREPAREDNESS PLAN/ CONTINGENCY PLAN

29 CFR 1910.38 Emergency Action Plan
29 CFR 1910.120 Emergency Response Program
6 NYCRR 373-2.4 Contingency Plan & Emergency Procedures
40 CFR 264 Subpart "D" Contingency Plan & Emergency Procedures
40 CFR 355 SARA Right-to-Know Act

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APPENDICES:

A Quick Reference Guide is available as an addendum to this document.
Reference "043-SAF-PRG-006a Emergency Preparedness/Contingency Plan Addendum"

1.0 PURPOSE

The Emergency Preparedness/Contingency Plan is designed to outline those procedures and precautions which the facility will follow to minimize the possibility of personal injury or extensive property damage due to unforeseen occurrences. The management of Ecobat Resources New York, LLC (Ecobat) places a high value on the safety and welfare of its employees and the general public. Accordingly, Ecobat intends to conduct all its operations in a safe and prudent manner. However, management also realizes that unforeseen circumstances may present hazards despite conscientious preventive efforts. The objective of this Plan, therefore, is to avoid or minimize the consequences of emergency situations arising out of routine operations or natural disasters, and deliberate acts of sabotage.

2.0 SCOPE

This Plan is intended to address potential emergencies which may arise from routine operations, natural disasters, and sabotage. The types of emergencies anticipated include, but are not limited to, the following:

Fires
Explosions
Gas Leaks
Chemical Spills, Leaks, or Contamination
Vehicle Accidents
Floods
Earthquakes
Hurricanes, Windstorms, Tornadoes, Etc.
Bomb Threats
Work Place Violence
Deliberate Sabotage
Terrorist Acts

In addition to addressing the types of emergencies outlined above, this Plan fulfills the requirements specified by the following documents:

1. Emergency Action Plan (OSHA Standard 29 CFR 1910.38): describing the procedures that employer and employees must follow to insure employee safety in the event of fire or other emergencies.

2. Fire Prevention Plan (OSHA Standard 29 CFR 1910.39): describing the major workplace fire hazards, proper handling and storage procedures, potential ignition sources and their appropriate control procedures, available fire protection equipment and responsibilities for maintenance and control of fire hazards.

3. Emergency Response Program (OSHA Standard 29 CFR 1910.120): describing the procedures that employer and employees must follow to insure employee safety in the event of emergencies associated with health hazards or hazardous substances.

4. Contingency Plan and Emergency Procedures (NYSDEC Standard 6 NYCRR 373-2.4 and USEPA Standard 40 CFR 264, Subpart D): describing the steps to be followed to minimize hazards to human health or the environment from fires, explosions, or any unplanned release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

5. Emergency Planning and Notification (USEPA Emergency Planning and Community Right to Know Act Standard 40 CFR 355): describes notification procedures to follow regarding a release of a SARA regulated substance.

This Plan will be revised whenever:

1. The facility RCRA Part 373 permit is revised,

2. The plan fails in an emergency,

3. The facility changes in its design, construction, operation, maintenance or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous material, hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency,

4. The list of emergency coordinators changes,

5. The list of emergency equipment changes, or

6. Regulations regarding emergency operations change.

Whenever an emergency occurs which requires that this Plan be implemented, a review will be conducted to determine the effectiveness of the Plan and to identify any modifications that may be necessary.

Affected employees will be retrained as modifications are implemented. A copy of this Plan is available at the facility for review by interested employees.

Copies of the Plan are sent to the local fire department, Garnet Health Medical Center, the New York State Police, the Town of Wallkill Emergency Management Office, and the Orange County Office of Emergency Management (Local Emergency Planning Committee). The Plan informs these agencies of the layout of the facility and the properties of the hazardous materials handled at the facility. In the event Ecobat revises the contents of the Contingency Plan, an updated version will be redistributed to local authorities.

3.0 DESCRIPTION OF OPERATIONS

Ecobat is engaged primarily in the reclaiming and refining of lead from scrap batteries. Whole batteries are mechanically broken and their components are separated. Lead scrap is then smelted using a reverb furnace. The reclaimed lead is further treated in refining kettles. Lead is ultimately cast into ingots (weighing approximately 65 pounds) or blocks (approximately 1 ton) and stored pending shipment.

In addition to the lead reclamation process, Ecobat also manufactures high grade sodium sulfate in the sodium sulfate crystallization process. Sulfur dioxide emissions from the furnace are scrubbed in a soda ash/caustic soda scrubber where a solution of sodium sulfite is produced. This solution is then oxidized and crystallized to produce high-grade sodium sulfate crystals.

Normal operations expose employees and plant visitors to two potential health hazards: lead and arsenic. Cadmium is also occasionally present although it occurs as a contaminant in the process. Plant personnel, using personal sampling pumps, conduct air monitoring quarterly to determine employee exposures to airborne lead, arsenic and cadmium.

Normal plant procedures require employees and visitors to wear respiratory protection (in lead process areas) and other appropriate protective equipment. A hazard assessment has been completed for every job function and appropriate personal protective equipment has been issued to each employee. With proper use of these protective devices and adherence to plant hygiene procedures, employees can complete a working career without suffering adverse health effects.

The risk of suffering adverse health effects from short-term exposure to the plant environment (such as would be experienced by emergency response personnel) is small. However, Ecobat's management strongly recommends that all outside personnel entering the premises in response to an emergency utilize appropriate protective equipment. Such equipment should include:

1. Respirator. A self-contained breathing apparatus (SCBA) in the pressure-demand mode will provide adequate protection. Alternate respiratory protective devices can be made available by plant management after prior consultation.

2. Head and eye/face protection. Protective equipment meeting the specifications of ANSI Standards Z89.1 and Z87.1 will be acceptable.

3. Hand protection. Protective equipment meeting the requirements of the manufacturer's guidelines and/or chemical resistance charts will be acceptable.

4. Foot protection. Shoes/boots with steel toes and metatarsal guards, meeting the specifications of ANSI Standard Z41, are acceptable. Rubber boots are recommended.

5. Protective outer garments. To avoid inadvertent removal of contaminated clothing from the premises, all exposed clothing should be washed or vacuumed prior to

departure. Disposable coveralls are recommended. Decontamination will be conducted in accordance with Section 14.5 as appropriate.

4.0 PLOT PLAN

The diagram in Appendix K provides a quick reference for the plant layout and locations of critical equipment. The following information is included in the diagram:

1. Location and construction of each building and structure on the premises.

2. Location and capacity of each bulk storage container for fuel gas, flammable liquid, or other hazardous material.

3. Designated storage areas for flammable liquids, compressed gases, and other hazardous materials.

4. Location and description of special hazard areas: motor control centers, and boiler located in the crystallizer building, etc.

5. Location of each shut-off valve on pipelines carrying water, fuel gas, or hazardous materials.

6. Location and description of fire protection equipment: hydrants and portable extinguishers.

7. Location and description of all spill equipment.

A topographic map of the plant and surrounding area may be found in the Petroleum Spill Prevention Control and Countermeasure Plan for the facility.

Prevailing winds generally are from the west in the summer and the northwest in the winter. A meteorological station is located on-site and connected to a computer system.

5.0 HAZARDOUS MATERIALS

The potentially hazardous materials listed below are present in various locations on the premises.

Hazard classifications follow the format specified in National Fire Protection (NFPA) Standard 704M: Identification of the Fire Hazards of Materials. Descriptions of the various classifications are presented in Appendix A.

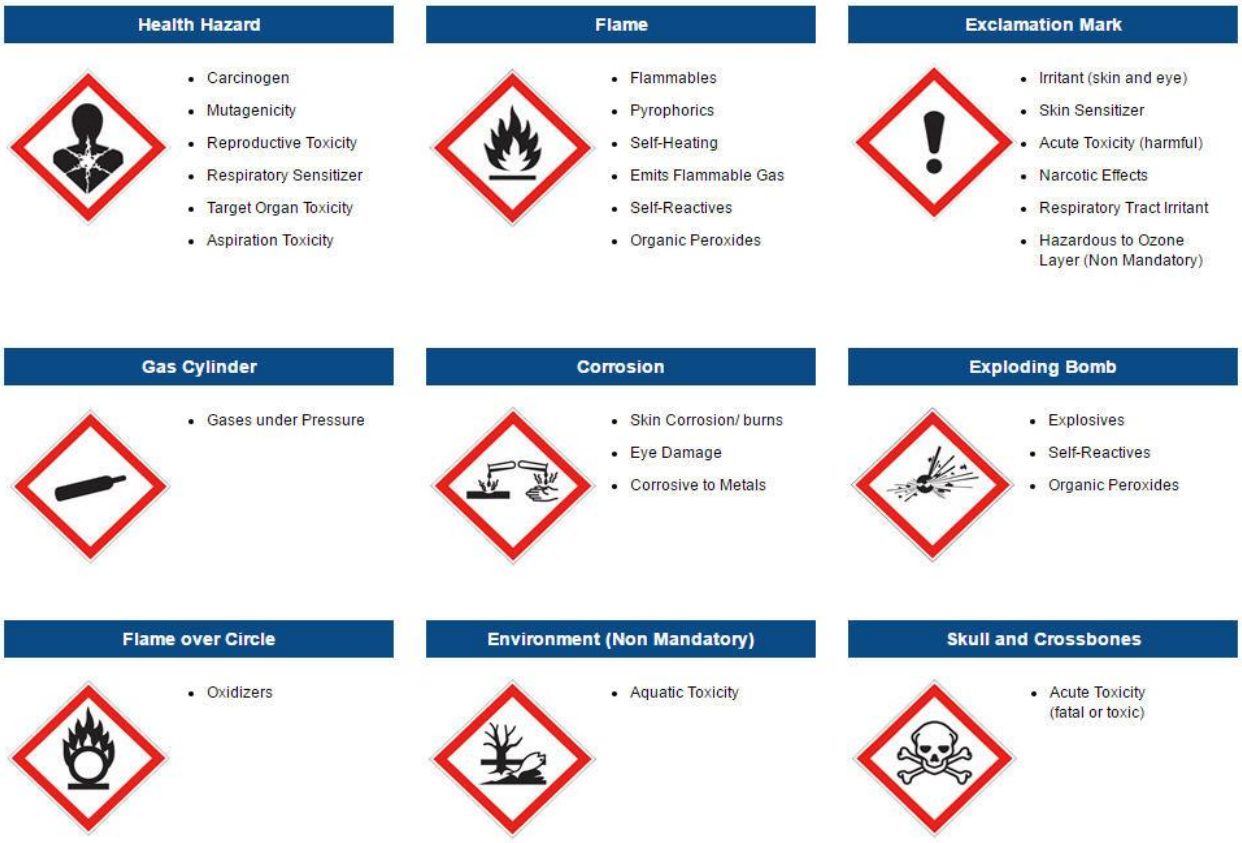
Material	Description	Health	Flammability	Reactivity	Precautions
Acetylene	Flammable gas; pungent odor	1	4	3	
Barium	Silvery metallic chunks	3	3	2	~~W~~
Calcium Aluminum or Metallic Calcium	Metallic silver gray powder; no apparent odor	1 3	1 1	2 2	~~W~~ ~~W~~
Caustic Potash (Potassium Hydroxide)	White solid, usually in form of flakes or pellets; corrosive	3	0	1	
Caustic Soda (Sodium Hydroxide) Liquid Caustic Soda	White solid, usually in form of flakes or pellets or 50% solution; corrosive	3 3	0 0	1 1	
Cobalt Sulfate Solution	Slightly reddish liquid, 10-30% solution	2	0	0	
Diesel Fuel	Flammable liquid	0	2	0	
Hydrochloric Acid	Oily liquid	3	0	1	
Hydrogen Peroxide	Slightly opaque liquid, <35% solution	2	0	1	OXY
Ferric Sulfate	Oily Liquid	1	0	0	
Iron Pyrite (Iron Disulfide)	Gray to silver colored granular material, slight sulfur odor	3	1	0	
Kerosene	Flammable liquid	0	2	0	
Oxygen (Compressed)	Nonflammable, but promotes combustion	0	0	0	OXY
Oxygen (Liquid)	Nonflammable, but promotes combustion	3	0	0	OXY
Phosphorus, Red	Dark red powder	1	1	1	
Propane	Heavier than air gas; artificially odorized	1	4	0	
Quicklime (Calcium Oxide)	White to gray solid	3	0	1	
Sodium, Metallic	Silvery metallic chunks	3	3	2	~~W~~
Sodium Nitrate (Niter)	White crystals; oxidizer	1	0	0	OXY
Acetone	Light yellow liquid	3	3	0	
Nitric Acid	Colorless to light brown fuming liquid	3	0	1	OXY
Arsenic Metallic	Gray-black metal	3	0	0	

Sodium Sulfate (Spray dryer solids)	White powder, mild sour odor	1	0	0	
Sulfur	Yellow solid or powder	2	1	0	
Sulfuric Acid	Oily liquid	3	0	2	~~W~~
Trisodium phosphate	White crystals	2	0	0	

5.1 Storage and Handling

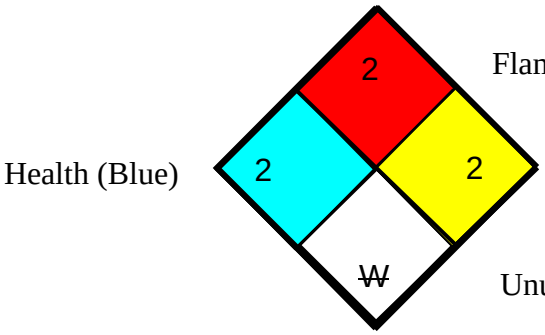
Storage of each of these materials is confined to specific designated locations as identified in the plot plan. Within these locations, each material is identified by individual container labels and/or a readily visible sign.

OSHA GHS labeling is used for hazard classification with pictograms identifying the hazard:



The SDS is the best place to find the correct pictogram for the chemical.

The NFPA hazard classification format is also used and displayed using the standard signals, e.g.:



Flammability (Red)

Health (Blue)

Reactivity (Yellow)

Unusual Reactivity with Water

Specific storage requirements for particular materials are as follows:

Acetylene: Cylinders must be stored upright, in a cool, well-ventilated location, away from all possible sources of ignition and combustible materials. Cylinders must be isolated from oxidizing gases. The primary storage area for cylinders is outside the main plant at the Northwest corner of the building adjacent to the Crystallizer.

Calcium, Metallic: Stored in flammable storage cabinet in the northeast corner of the refinery and in the trailer in the rear parking lot.

Calcium/Aluminum Alloy: Stored in flammable storage cabinet in the northeast corner of the refinery and in the trailer in the rear parking lot.

Caustic Potash (Potassium Hydroxide): Stored in a cool, dry location inside the facility lead (finished goods) warehouse.

Caustic Soda (Sodium Hydroxide): Stored in a dry place inside the refinery; protected against moisture and water. Kept separate from acid and easily ignitable materials. Liquid caustic (50% solution) stored in tanks inside ETP and scrubber building. A 55-gallon drum of liquid caustic soda may be stored in the crystallizer.

Diesel Fuel: Stored outside, in bulk containers (above ground). Storage area must be kept clear of combustible materials, and sources of ignition. One mobile cart has a diesel tank that is used to dispense fuel into heavy equipment (see Appendix G for complete listing of tanks and capacities).

Ferric Sulfate: Liquid ferric sulfate is stored in an above ground tank; one located inside the ETP and one located inside the scrubber building.

Hydrochloric Acid: Stored and used in two (2) liter bottles in the Quality Control Laboratory. 55-gallon drums of acid stored in the ETP.

Hydrogen Peroxide: Stored in a cool, dry, well ventilated location outside the ETP building. There are also portable containers used inside the ETP and scrubber operations.

Iron Pyrite: Stored in a cool, dry location by the east wall of the refinery lead warehouse on storage racks; protected against contact with acid.

Oxygen: Stored as a liquid in outside bulk storage vessel. Storage area is isolated from combustible gas installations and kept clear of combustible materials. Compressed gas cylinders are stored separately from fuel gas cylinders and combustible materials.

Phosphorous (Red): Stored in a hazardous materials cabinet in the refinery separate from other materials and in the trailer in the rear parking lot.

Propane: Bulk storage is an outside above-ground tank. Storage area must be kept clear of combustible materials, sources of ignition, and oxidizers.

Quicklime (Calcium Oxide): Stored in a cool ventilated location in the containment building and sometimes staged in the refinery-warehouse; and protected against contact with water and acid.

Barium and Sodium, Metallic: Stored in a hazardous materials cabinet in the northeast corner of the Finished Goods Warehouse and additional sodium inventory is also stored in the trailer in the rear parking lot.

Sodium Nitrate: Stored in the refinery warehouse separate from all combustible or readily oxidizable materials.

Spray Dryer Product: Spray dryer product is a hazardous waste generated by Ecobat and must be handled as such. Any spill or release of the product must be reported to the plant EHS Compliance Manager.

Sulfur: Stored on racks in the refinery warehouse separate from nitrates and oxidizing materials along the East wall of the warehouse.

Sulfuric Acid: Stored separately from nitrates and combustible materials; concentrated acid is protected against contact with water. Dilute sulfuric acid from the Battery Wrecker operation is stored in a separate stainless-steel tank at Water Treatment. Concentrated acid is used at the crystallizer and at the ETP.

Trisodium Phosphate: Stored on racks outside the ETP under tarps.

5.2 Sources of Ignition

Sources of ignition include welding and cutting operations; electrical switches, or other equipment; mobile equipment; and moving machinery which could generate sparks by friction. None of these sources are permitted in storage areas for materials having a flammability classification of "2" or higher, unless adequate protective measures are taken, in accordance with the facilities “Hot Work Permit Program.”

5.3 Housekeeping

Routine housekeeping efforts will prevent dangerous accumulations of combustible or flammable materials. Rubbish containers are emptied on a daily basis.

Oil or solvent-soaked rags are stored in covered containers pending cleaning or disposal.

Accumulations of dried grass or weeds around bulk storage tanks, flammable gas or liquid dispensing stations, compressed gas storage areas, etc. are not permitted.

6.0 OTHER POTENTIALLY HAZARDOUS SUBSTANCES

In addition to the previously listed hazardous materials, the following potentially hazardous substances could be released or evolve under emergency conditions:

6.1 Arsine or Stibine

Both substances are extremely poisonous. These gases are not generated during normal operations, but may evolve as a result of spills or leaking containers. The gases are destroyed at high temperatures, such as likely would occur under fire conditions. Data sheets on both substances are included in Appendix B.

6.2 Other Gases

Other gases that may be generated at the facility under emergency conditions and their appropriate hazard classes are listed below.

Material	Description	Health	Flammability	Reactivity	Special Precautions
Chlorine (from chloride batteries)	Toxic gas, corrosive	3	0	0	OXY
Hydrogen Sulfide	Highly toxic and flammable gas	3	4	0	
Sulfur Dioxide	Highly toxic gas; non-combustible	3	0	0	

6.3 Hazardous Waste/Hazardous Waste Constituents

Various wastes that are received, stored, treated, and generated at the site have been characterized as hazardous or as having hazardous components. Emergencies involving these wastes or their constituents will be treated as outlined in Section 9.0 Emergency Procedures.

7.0 EMERGENCY ORGANIZATION

The Vice President of NY Operations will function as the primary Emergency Coordinator should an emergency arise. In the absence of the Vice President of NY Operations, a Director (Assistant Plant Manager), or a designated Alternate Emergency Coordinator, will fulfill this function. The following Emergency Notification List includes the names and telephone numbers of key personnel. In the event of an emergency, the senior supervisor at the plant is responsible for immediately notifying the appropriate emergency services agency and the Emergency Coordinator. If the Emergency Coordinator cannot be reached, the first alternate will be contacted. If neither of these individuals can be reached, the supervisor will continue down the list until an alternate Emergency Coordinator is contacted. This individual will then function as the Emergency Coordinator until relieved by a more senior manager on the Emergency Notification List.

At all times, at least one of the individuals listed on the Emergency Notification List must be present at the facility or on call to respond to emergencies. These individuals must maintain a thorough familiarity with this Plan, the layout, operations and activities of the facility, the locations and characteristics of hazardous materials at the facility and the locations of records at the facility. Each of these individuals, when acting as Emergency Coordinator, has the authority to commit the resources necessary to carry out this Plan, as indicated in Appendix I – Authority to Commit Resources.

The Agency Liaison shall be contacted as soon as possible anytime this Plan is implemented. The Agency Liaison or the facility emergency coordinator is responsible for making all notifications to regulatory agencies as specified in Appendices C (SARA Emergency Notification Procedures) and D (Contingency Plan Emergency Procedures) of this Plan and in accordance with applicable corporate policy.

The Emergency Notification List is posted in all manager's offices, plant supervisor's office, the guard house, and the quality control lab. Copies of the complete Plan are in the main office and the safety office. In addition, personnel listed as either primary or alternate Emergency Coordinators have copies of this Plan.

65 Ballard Road
Middletown NY 10941

EMERGENCY NOTIFICATION LIST

In case of significant incident or injury – contact 911 Immediately.

POSITION	NAME/ADDRESS	FUNCTION	TELEPHONE NUMBER
V.P. New York Operations	Thomas Mann 24 Pond Hill Lane Walden, NY 12586	Primary Emergency Coordinator	Office: (845) 673-2210 Home: (845) 778-4632 Cell: (845) 395-6179
Director	Brian Tigue 19 Skinners Ln Port Jervis, NY 12771	Alternate Emergency Coordinator	Office: (845(673-2260 Cell: (845) 551-4711
Director	Chris Hall 145 Roundhill Rd Dingmans Ferry, PA 18328	Alternate Emergency Coordinator	Office: (845) 673-2257 Cell: (347) 467-0178
Safety Manager	Jason Iorio 7 Riverside Drive Pine Bush, NY 12566	Alternate Emergency Coordinator	Office: (845) 673-2226 Cell: (845) 239-7708
Environmental, H&S Compliance Sr. Manager	Mark Hoffman 41 Mitchell Lane Westtown, New York 10998	Alternate Emergency Coordinator and Agency Liaison	Office: (845) 673-2225 Cell: (845) 239-3060

START AT THE TOP OF THE LIST AND CONTINUE TO CALL PLANT MANAGEMENT UNTIL YOU GET SOMEONE.

"#" Must first be pressed to access an outside line from any phone at the plant.

EMERGENCY NUMBERS:

POLICE DEPARTMENT (State) - 845-344-5300
FIRE DEPARTMENT (Silver Lake Fire District) – 845-343-7131
AMBULANCE – 845-342-9977 (TOW Volunteer) or 845-343-1212 (Mobile Life)
HOSPITAL (Garnet Health Medical Center) – 845-333-1000

} 911

SPILL REPORTING: FOR SPILLS, FIRES, EXPLOSIONS, STACK GAS RELEASES, OPACITY, ETC.

1. NATIONAL RESPONSE CENTER (FOR ALL RELEASES)	#-(800) 424-8802
2. NYSDEC SPILL HOTLINE/STATE EMERGENCY RESPONSE COMMISION (FOR ALL RELEASES)	#-(800) 457-7362
3. ORANGE COUNTY OFFICE OF EMERGENCY MANAGEMENT (FOR ALL RELEASES)	#-(845) 291-3199
4. SUPERINTENDENT OF THE TOWN OF WALLKILL SEWER & WATER DEPARTMENT (RELEASES TO SEWER ONLY)	#-(845) 342-1668
5. NYSDEC REGION III AIR DIVISION (RELEASES TO AIR ONLY)	#-(845) 256-3185
6. ECOBAT CORPORATE TRANSPORTATION (FOR TRANSPORTATION RELEASES ONLY) SPILL CENTER (IF YOU CANNOT GET CORP TRANSPORTATION)	#-(214) 686-0290 #-(800) 456-9038
7. ECOBAT CORPORATE VP EHS COMPLIANCE OFFICE (FOR ALL RELEASES)	#-(214) 583-0347

TWO-WAY RADIO COMMUNICATION LIST

7.1 TWO-WAY RADIO COMMUNICATION

Portable Two-Way Radios are currently available at the plant by department as follows:

Maintenance

Air/Water/Quality

WESP

Smelter Operations

BW/YD/Ship Operations

Plant Management

Security

Plant Safety

Q. C. Laboratory

Engineering

Confined Space Rescue Trailer

Crystallizer

8.0 EMERGENCY NOTIFICATION AND ALARM SYSTEM

In the event of an emergency, the Facility Evacuation Alarm System shall be the primary communication medium for notifying employees that an emergency exists and the need to evacuate. The Alarm consists of both an audible siren and a pre-recorded voice alert (*Attention Please evacuate the facility and proceed to your designated checkpoint).* Once the Evacuation Alarm System has been activated, evacuation is required.

1. The person discovering an emergency situation shall activate the internal fire alarm system and contact their immediate supervisor who will than notify the Primary Emergency Coordinator (@ x 2218) or the EHS Compliance Manager (@ x 2225) to report the emergency.

2. If the designated Emergency Coordinator cannot be reached, the supervisor shall proceed down the "Emergency Notification List" until a designated alternate Emergency Coordinator is contacted.

Information regarding evacuations will be relayed to the Crystallizer, Effluent Treatment Plant (ETP) and the WESP building via the internal evacuation alarm system. In addition to the evacuation alarm system, and in the event more detailed or non-evacuation instructions need to be communicated to employees, emergency coordinators will communicate by means of hand-held radio, and if necessary, personnel stationed at key locations to assist in directing employees as needed.

9.0 EMERGENCY PROCEDURES

Whenever an imminent or actual emergency situation occurs at the plant, 911 should be contacted immediately and then the Emergency Coordinator must be contacted. The Emergency Coordinator (or his designated alternate) will take the following action:

1. Assess the situation to determine the nature of the emergency, its potential severity, and the protective measures required.

2. The supervisor shall immediately notify the appropriate local authorities (fire, police, etc.) if a significant injury or incident occurs. During notification to local authorities, inform them of the nature of the emergency, and the assistance requested. The supervisor or emergency coordinator shall meet emergency services at the gate, identify themselves as the EC and provide information on the incident.

   The Smelter Supervisor on site is responsible for ensuring that the situation is fully understood by any and all emergency personnel (fire, police, etc.) responding to the request for assistance until one of the Emergency Coordinators is on site. The Emergency Coordinator will then relieve the supervisor and assume authority for directing all actions taken in response to the emergency until the outside emergency response personnel arrive. At that time, the head of the emergency response unit (fire chief, police officer, emergency medical provider) will become the Incident Commander and, working in close cooperation with the plant Emergency Coordinator, will assume authority for all emergency response activities.

   Note: During off shifts, on weekends or holidays, the smelter supervisor on site shall be the Emergency Coordinator until the Emergency Coordinator or his designated alternate arrives at the site. If outside assistance has been requested from (fire, police or medical) the smelter supervisor shall be at the front gate to meet and communicate with the emergency responders, assist them and escort them to the area of concern.

3. If applicable, activate the plant Evacuation Alarm System to notify personnel that an emergency exists. This will initiate an evacuation of the facility. (See Section 10.0 Evacuation)

4. Initiate all prudent measures to minimize the severity of the emergency. In this effort, the following priorities will be established:

   (A) Safety and health of employees and the general public.
   (B) Protection of plant property and materials.
   (C) Initiate equipment shut-down as necessary.
   (D) Maintenance of normal operations, maintenance of normal operations can only occur when approved by the Incident Commander (fire chief, police or medical).

5. **AS SOON AS POSSIBLE**, the Emergency Coordinator shall notify the Corporate Office of the extent and circumstances of the emergency.

6. The Agency Liaison shall notify the appropriate state and local agencies as required under SARA regulations (see Appendix C).

7. Declaration of Emergency Termination is made by incident command (e.g., Fire Department, Hazardous Materials Response) if an external agency is involved. If the emergency is managed internally, the primary emergency coordinator or his alternate will declare the emergency terminated. The termination of the emergency will be communicated to the V.P. of New York Operations.

In addition to these actions, the Emergency Coordinator will, when necessary, adhere to the list of emergency procedures specified in Appendix D.

The following general procedures will be followed as appropriate in response to specific emergencies: In all cases, back-up personnel and basic life support personnel will be on standby.

9.1 Fire

1. Attempt to isolate the fire. Close doors where applicable. Shut off blowers and conveyors as appropriate to minimize the spread of fire.

2. Designated incipient stage fire responders may, if possible, attack the fire with portable extinguishers. Incipient stage fire responders must maintain positions between the fire and their escape route at all times. The need for positive-pressure SCBA (self-contained breathing apparatus) indicates a fire has progressed beyond the incipient level and requires evacuation of Ecobat personnel.
   Note: All employees are appropriately trained and are designated as incipient stage fire responders.

3. If the fire involves leaking gas or flammable liquid, attempt to stop the flow by closing the appropriate control valve. As a general rule, do not extinguish a fire involving a flammable gas unless the flow of gas can be stopped first. Main control shut off valves are located as follows:

   (A) The main shut off valve for the propane gas is located at the bottom of the storage tank on the south end of the tank and there is a remote shut off located on the fence for the system.
   (B) The main shut off valve for the natural gas supply is located in the northwest corner of the main motor control center for the plant. This valve has been painted yellow and a sign above it states MAIN GAS SHUT OFF.
   (C) The main shut off valve for the Liquid Oxygen System is located at the bottom of each tank.

4. Attempt to remove all combustible materials from the fire area.

5. As necessary, initiate shutdown of furnace(s) and/or refining kettles.

6. **DO NOT** use water to extinguish fires in the following areas:

   (A) Smelter (includes refinery and furnace area)

9.2 Explosion

1. Identify the source and cause, if possible.

2. Take immediate action to prevent further damage. The "buddy system" will be used when taking these actions. If leaking gas or flammable liquid is involved, attempt to stop the flow.

3. If the fire involves leaking gas or flammable liquid, attempt to stop the flow by closing the appropriate control valve. As a general rule, do not extinguish a fire involving a flammable gas unless the flow of gas can be stopped first. Main control shut off valves are located as follows:

   (A) The main shut off valve for the propane gas is located at the bottom of the storage tank on the south end of the tank.
   (B) The main shut off valve for the natural gas supply is located in the northwest corner of the main motor control center for the plant. This valve has been painted yellow and a sign above it states MAIN GAS SHUT OFF.
   (C) The main shut off valve for the Liquid Oxygen System is located at the bottom of each tank.

4. Take appropriate measures to prevent or control the spread of fire.

9.3 Spills or Releases of Hazardous Materials

1. Attempt to minimize and confine the spill to the extent possible. The "buddy system" will be used during these procedures. Turn off flow valves, electrical service, or other process equipment contributing to the spill where appropriate. If feasible, erect earthen dikes to contain spills, using front-end loaders, shovels, etc. Procedures and equipment for spill containment and waste removal can be found in Section 12.2.

2. If flammable materials are involved, cut off or remove all sources of ignition and ventilate the area as appropriate.

3. Seventeen (17) baghouses and a WESP are present at the facility to prevent the release of airborne particulate matter to the atmosphere. In the event of a control equipment malfunction resulting in emissions of air contaminants in excess of those allowed by applicable permits or regulations, the established procedures for the safe shut down or curtailment of processes and air pollution control equipment should be implemented, as appropriate. The address and phone number for the Department of Environmental Conservation Division of Air can be found in Appendix C.

9.4 Floods

1. Prior warning should be provided in these instances, permitting some preplanning. Based on an assessment of potential severity of flooding, initiate the following actions and then refer to the checklist located in Appendix “L”.

   (A) Initiate shutdowns of furnace(s) and refining kettles, battery wrecker equipment and other electrical systems that may be affected by rising flood waters.

   (B) Move critical equipment, expensive materials and valuable records to safe locations.

   (C) Anchor material storage tanks which are susceptible to floating.

   (D) Move water-soluble or water reactive chemicals to a safe location.

   (E) As appropriate, construct dikes around critical buildings and materials to restrict entry of water.

   (F) Shut down utility (gas and electric) services before flooding occurs.

(G) Remove all materials from the outside permitted battery storage area if necessary.

Reference Facility Flood Preparation Checklist located in Appendix "L".

9.5 Earthquake/Hurricanes/Thunderstorms/Tornadoes

1. The Emergency Coordinator will determine if evacuation is necessary. If evacuation is required, the procedures under Section 10.0 Evacuation shall be followed. If evacuation is not needed the following procedures will shall followed.

   (A) Take immediate action to prevent further damage. The "buddy system" will be used when taking these actions. If leaking gas or flammable liquid is involved, attempt to stop flow.

   (B) Shut off damaged pipelines, electrical equipment, and other equipment as appropriate. Lock out equipment as necessary.

   (C) Take appropriate measures to prevent or control the spread of fire.

   (D) Choosing to take shelter is necessary in many emergencies. To effectively shelter, you must first consider the hazard and then choose a place in the facility that is safe for that hazard. For example, for a tornado, a room should be selected that is an interior room on the lowest level away from corners, windows, doors and outside walls (i.e., locker room). There may be situations, depending on your circumstances and the nature of the disaster, when it's simply best to stay where you are and avoid any uncertainty outside by "sheltering in place".

9.6 Vehicle Accidents

1. Drivers of company vehicles transporting hazardous materials must notify the Dispatch Office immediately in the event of an accident that has released or has the potential to release hazardous materials or wastes to the environment.

9.7 Bomb Threats…… Section 15.0

9.8 Work Place Violence

1. The facility Emergency Coordinator or his designated alternate shall fully cooperate with and assist the local agency having jurisdiction on all workplace violence issues.

In the event of an active shooter, use the following as guidance:

1. Go to a room or location that can be locked or barricaded by using available material.
2. Close the window blinds, turn off the lights and get everyone down on the floor so that no one is visible from outside the room.
3. Spread out and seek concealment behind walls, desks, file cabinets, etc.
4. Have someone call 911 using a cellular telephone or call 911 from any office telephone. Be aware that the 911 system will most likely be overwhelmed.
5. When you reach the dispatcher, describe the situation and give your name and location; remain in place until police give the 'All Clear.'
6. Unfamiliar voices may be the shooter attempting to lure victims from their safe space; do not respond to any voice commands until you can verify with certainty that they are being issued by a police officer.

9.9 Deliberate

1. The facility Emergency Coordinator or his designated alternate shall fully cooperate with and assist the local agency having jurisdiction on all deliberate sabotage issues.

9.10 Terrorist Acts

1. There are no specific plans in place at this facility. We are an industrial facility that is not expected to be a target of a terrorist threat – if one should arise, we would implement the measures outlined in Ecobat's Site Security Plan Risk Based Performance Standard 13. The facility would address the situation at the time of an alert commensurate to the designated threat level in a proper fashion and would alert the appropriate authorizes. The facility would rely on local enforcement authorities to advise us how to proceed and if a specific threat were issued to the facility, would request local enforcement to provide assistance.

10.0 EVACUATION

The need for partial or full evacuation shall be determined by the primary emergency coordinator or their designated representative. In the event that an evacuation is ordered, personnel will proceed to the nearest available exit. All exits are designated on the enclosed PLOT PLAN (Appendix J). Individual departments will designate a primary and alternate exit; the locations of these exits will be made known to all employees (See Section 13.0 Education and Training).

After departing the building, Main plant personnel will assemble by department in the employee parking lot behind the crystallizer building. Employees working at the WESP building will assemble at the fire hydrant (noted on the plot plan) at the north east corner of the WESP building. Once at the rally point headcount and radio communication will verify all have exited the building safely. All assembly areas are identified by signs. Other evacuation areas may be designated by

the emergency coordinator if necessary. Ecobat will identify the alternate meeting location after an evaluation of the conditions specific to the emergency.

Ecobat emergency coordinators will take into account wind direction, location of the incident and revise the assembly area as necessary. The most likely alternate evacuation areas include the front lawn and east trailer parking lot, but alternate areas are not limited to those locations. Once an alternate location is identified, the location will be communicated by means of radio and personnel stationed at key locations to assist in directing employees as needed.

Each supervisor will immediately account for all personnel under his direct supervision. Upon completion of the headcount, the supervisor will communicate the results to the Emergency Coordinator or his alternate.

No person will be permitted to depart the premises without approval of the Emergency Coordinator or his alternate. Main security gates will be opened by the security guard, and the security guard on duty will manage traffic at the entrance gate and direct emergency equipment onto the site.

Any evacuation off-site shall be organized by the Emergency Coordinator.

In the event of media coverage during an emergency situation, the Vice President of Operations or his designated representative shall be responsible for any information given to the media and will control their entrance to the plant. On-site security personnel will assist in the control of access to the site.

11.0 FIRST AID AND MEDICAL CARE

First aid efforts will be directed by representatives of the facility safety department and assisted when necessary by employees who have completed first aid training. In the absence of a representative from the safety department a Senior Management Representative may select one of the plant's trained First Aid Responders to direct medical activities until advanced help arrives.

First aid operations will be established in the Employee's Wash Room. In the event the Wash Room cannot be used because of an emergency situation, alternate operations will be established in the area of the guardhouse or other appropriate area. A fully stocked first aid kit will be maintained at all times for transport to the established first aid area for use in an emergency.

In addition, an adequate supply of first aid materials will be maintained in a portable trauma kit located in the 1st floor main hallway on top of gray supply cabinets for immediate transfer to any point of need in an emergency.

If any person is sent off the premises for medical attention, via ambulance or otherwise, they shall be accompanied or met at the medical facility and a record of the departure will be maintained by a management representative for the facility, who will in turn convey this information to the

Departmental Supervisor for his for his report. (This action is necessary to assist in accounting for all personnel under emergency conditions.)

Upon receiving instructions from the Emergency Coordinator or his designee, the Human Resource Manager shall contact the family of each injured employee, advising the family of the nature of the injury and the employee's present location and status.

12.0 EMERGENCY EQUIPMENT

Fire Extinguishers (Class A/B/C, D)
Fire Hydrants
Spill Kits
Mobile Equipment (loaders, backhoes, etc…)
Respiratory Protection (including airline respirators)
First Aid Kits (including burn kits and AED)
Confined Space Rescue Equipment (fully equipped trailer)
Eyewash / Showers

12.1 Fire Protection

Portable fire extinguishers are distributed throughout the facility so that the applicable maximum travel distances are not exceeded. The location of each extinguisher is marked by a sign. The enclosed plot plan designates the exact location of all portable fire extinguishers.

The majority of the fire extinguishers are 10 pound, ABC, multi-purpose extinguishers. Several 20 pound CO_2 extinguishers are also available. Class D extinguishers are located in areas where reactive metals are present.

Each extinguisher is inspected monthly by the appropriate Department and undergoes an annual maintenance inspection by an outside service. Hydrostatic testing is performed in accordance with applicable standards by the outside service used to inspect fire extinguishers.

Each time an extinguisher is removed from service for maintenance or recharging, an alternate extinguisher is installed in its place.

All employees are trained in the use of extinguishers, as specified under Section 13.0 Education and Training. Use of extinguishers under emergency conditions is restricted to those employees who have been assigned by their immediate supervisor.

Water is supplied to the facility by the Town of Wallkill. Adequate water volume and pressure are available to operate fire-fighting equipment. Due to the presence of materials which may react violently with water, sprinklers are not used in the production areas of the plant. However, all administrative areas are equipped with sprinklers. Fire hydrants are located at the northwest entrance from Ballard Road and at the southeast railroad gate to the facility.

Reactive metals are stored in approved flammable storage cabinets and are grounded.

12.2 Spill Containment

In the event of a spill, Ecobat personnel are already equipped with basic PPE that includes a personal respirator (i.e., issued to each employee), chemical resistant boots, hardhat, aluminized gear (if working in smelter) and a personal uniform. In addition, specific process areas have PPE staged specific to the hazards (i.e., aluminized gear in the smelter to protect from molten lead and chemical resistant suits in the scrubber building to protect from chemical splashes); however these are process-oriented equipment and not specific to spill response, but can be used as necessary. In addition, lime or soda ash are capable of neutralizing acid spills. Lime is stored in the containment building and soda ash is stored in silos outside of the effluent treatment plant.

In addition to the basic PPE used by personnel and equipment used specific to the process area, spill kits are available at designated locations (see below). Spill kits contain the basic materials for isolating an area, containing a spill and cleaning a spill. Larger spills that are not in contained process areas will be addressed on a case-by-case basis, but will likely require outside services and be managed by a third party spill response company.

Content of Spill Kit - Item	Capability of Item
1. Chemical Resistant Apron	Capable of protecting body from chemical splashes
2. Latex Gloves	Capable of protecting hands from chemical contact (acids and alkalis)
3. Splash Goggles	Capable of protecting eyes from chemical contact
4. Chemical Resistant Gloves	Capable of protecting hands from chemical contact
5. Tyvek Suit	Capable of protecting an employee from hazardous dry dust and aerosols and non-hazardous liquid splashes
6. Danger Tape	Capable of alerting personnel to emergency and used to isolate an area

7. Squeegee	Capable of directing liquids away from sensitive areas and aid in clean-up
8. Shovel	Capable of cleaning up oil absorbent, digging in soils or other media to create berm or remove material
9. Absorbent Matts	Capable of absorbing oil or chemical spills
10. Absorbent Socks	Capable of absorbing oil or chemical spills and can be used to contain a spill from migrating further
11. Speedy Dry	Capable of absorbing oil or chemical spills
12. Oil Catch Pan	Capable of containing oils spills from leaking equipment

Spill kits are available at the following locations:

1. Feed Room (between the smelter building and containment building)
2. SRF Loading/Unloading Area (northern end of containment building)
3. Outside West Yard Door (across from the hazardous waste container storage and adjacent to the hydrogen peroxide tote storage)
4. East Lot Mobile Equipment Parking (adjacent to the central accumulation area and mobile equipment parking)
5. Outside Receiving Warehouse
6. Northeast end of employee parking area
7. North Side of Crystallizer Building
8. Adjacent to Kettle Baghouse
9. Adjacent to Rail Dock
10. Scrubber Building
11. ETP Building

In addition, the following tools and equipment are available for use in confining and controlling spills of hazardous waste and hazardous materials.

1. Front-end loaders (located in the containment building or east trailer parking lot).

2. Shovels, squeegees, floor sweepers are located in all departments for use as needed.

4. A supply of absorbent material is available for use in the containment of any chemical spill. Absorbent materials are located in dispensing bins throughout the facility and in bulk storage located in the receiving warehouse. Absorbent socks are also available on-site.

4. Above ground tanks in the wastewater treatment facility are surrounded by containment walls which are capable of holding the entire capacity of the tanks if

spillage or leakage occurs. In case of a leak or spill from a tank the material is pumped from the secondary containment system and treated at the on-site water treatment facility.

5. A rainwater collection and treatment system with the capacity to withstand a 24-hour maximum probable storm is in place at the facility. This system prevents runoff, flooding and the contamination of water supplies.

6. Any material spilled will be cleaned up and containerized appropriately depending upon the media. Lead bearing materials spilled will be processed on-site accordingly. Other wastes will be characterized and disposed in accordance with applicable state and federal regulations. Procedures for waste characterization are detailed in the RCRA operating permit waste analysis plan. Ecobat has treatment storage disposal facilities and waste management companies available for assistance as necessary.

7. The Environmental Manager, EHS Compliance Manager or Corporate EHS Compliance is responsible for notifying an outside contractor for spill cleanup. Ecobat has a contract in place, at the time of this permit application submission, with a spill response contractor who can fulfill the response needs in the event of a spill or emergency. Ecobat will provide a copy of this contract upon request by the Department. Should Ecobat terminate this contract for any reason, Ecobat will attempt to make alternate arrangements.

In the event of a release to the environment, any spill would be immediately contained to the extent practical. A simplified action plan for spill response might look like this:

1. Evacuate personnel from the immediate area of the spill.
2. Identify the spilled material(s) and stop the leak/spill at the source if this can be performed in a safe manner.
3. Extinguish or disconnect all sources of ignition and contact the fire department if the chemical is flammable.
4. Notify the spill response team; both on-site personnel for immediate control to the extent practicable as well as a third party contractor as necessary.
5. Barricade the spill area and notify others in surrounding areas.
6. Don the appropriate personal protective equipment.
7. Contain the spill.
8. Clean up the spill.
9. Dispose of the spill in accordance with local, state and federal regulations.

Additional information on spill response is included in following Written Compliance Plans:

Storm Water Pollution Prevention Plan,
Petroleum Spill Prevention Control, and Countermeasures Plan, and

Hazardous Substance Spill Prevention Plan

12.3 Respiratory Protective Equipment

The following respiratory protective equipment is available for emergency use.

5. Currently the facility utilizes air-line respirators in place of SCBA's. Airline respirators are used in place of SCBA's to provide a longer duration of protection and a higher protection factor for employees and eliminates the need for frequent change of air cylinders. All air-line respirator equipment is maintained and cleaned in the same manner as assigned respirators for all employees and each air-line respirator is equipped with a 5-minute escape bottle. Air-line respirators are stored in Sanitation (adjacent to the laundry area).

12.4 Miscellaneous

The following additional emergency equipment is available. Each piece of emergency equipment is inspected at least monthly to verify usability, and written records are maintained including inspection date and equipment condition.

1. Burn kits, First Aid kits, AED, and Oxygen Resuscitators are available for use by plant First Aid Responders in the event of an emergency.

2. Emergency lighting units are located throughout the plant in high risk areas.

3. Eyewashes and drench showers are located throughout the plant, see plot plan for locations.

4. In the event of a power failure, diesel powered emergency generators supply electricity to the entire facility with the exception of the water treatment area. The crystallizer building also has an emergency generator.

5. Safety Data Sheets (SDSs) for the chemicals found in the plant are located in the Safety Training area and are also available on any personal computer with Internet access.

6. All aisles inside the facility are maintained at a sufficient width and height to allow unobstructed movement of emergency equipment.

13.0 EDUCATION AND TRAINING

The following educational and training programs are conducted for the personnel indicated.

13.1 All Employees

Instruction includes:

1. Specific duties of the particular job assignment. This instruction is provided by the employee's immediate supervisor, using a combination of classroom and on-the-job training as appropriate.

2. General contents and details of this plan, including;

   (A) Fire hazards presented by plant operations;

   (B) Emergency notification system;

   (C) Evacuation procedures;

   (D) Procedures for reporting emergencies;

   (E) Location of exits.

3. Instructions to contact the Emergency Coordinator or his designated Alternate(s) for specific details concerning any aspect of this plan.

4. This training is completed in accordance with the following schedule:

   (A) Initial training to be completed at the time of Plan implementation. Subsequent new hires will complete training prior to beginning work.

   (B) Re-training under paragraph 1 each time an employee changes job assignments.

   (C) Re-training within two months of any substantive change(s) in this plan.

   (D) Annual refresher training.

13.2 Emergency Coordinator and Designated Alternate(s), Department Heads, Supervisors

Instruction includes:

1. Specific instruction on all details of this plan.

2. Description of specific duties of the individual's particular job, as they relate to emergency preparedness.

3. This training is completed in accordance with the following schedule:

   (A) At the time of employment (new employee orientation).

   (B) Annual refresher training.

4. Management will maintain a record of all training completed under this section, including:

   (A) Job Title;

   (B) Name of person filling position;

   (C) Job Description, specifying the qualifications required to fill the position and the general duties of the position;

   (D) Description of Training completed, including date, duration of instruction, and description.

13.3 Supervisors and Leadmen

Instruction includes:

1. Notification of designation as a plant incipient stage fire responder.

2. Specific details of Section 9.0 Emergency Procedures as specified under Section 9.1 Fire.

3. Location, description, operating instructions and capabilities of portable fire extinguishers installed on the premises.

4. Principles and hazards of incipient stage fire responding.

5. Classroom and video training in the use of portable fire extinguishers.

6. Instructions necessary to assist in conducting a safe and orderly evacuation of the premises under emergency conditions.

7. This training is completed in accordance with the following schedule:

   (A) At the time of employment (new employee orientation).

   (B) Annual refresher training.

13.4 Administration (Including Guards)

Instruction includes:

1. Procedures specified under Section 9.0 Emergency Notification and Section 15.0 Bomb Threats.

2. Training is completed prior to initial assignment and annually thereafter.

13.5 Drills and Critiques

1. Evacuation drills are conducted at least annually.

2. A critique of the response/drill will be conducted by personnel appointed by the emergency coordinator. This critique will be discussed with the plant manager, emergency coordinator and other applicable personnel. A follow-up will be conducted to ensure appropriate changes have been made, when necessary.

14.0 DECONTAMINATION PROCEDURES

The following program constitutes the decontamination procedures used at the Ecobat facility. The program summarizes the requirements of the OSHA Lead Standard, the OSHA Inorganic Arsenic Standard, the OSHA Cadmium Standard, the OSHA Hazardous Waste Operations and Emergency Response Standard, and Ecobat Guidelines and Policies.

14.1 Protective Clothing

Protective clothing provided includes:

1. Coveralls and or uniforms

2. Gloves

3. Shoes, boots or coverlets

4. Face shields

5. Vented goggles and/or safety goggles

6. Hard hats

7. Respirators; and

8. Other necessary equipment and clothing as required

Protective clothing is provided to the employees in a clean, dry condition daily. Extra clothing and equipment are provided on an as needed basis.

The protective clothing is cleaned, laundered or disposed of in accordance with appropriate regulations. Plant Management will assure that the repairs or replacement of the protective clothing and equipment is conducted as necessary to maintain their effectiveness. The contaminated clothing is removed at the completion of a work shift or more often if necessary in the change rooms provided. The clothing is placed in closed containers which prevent the dispersion of lead, arsenic or cadmium outside the container.

The containers of contaminated clothing are labeled in accordance with the OSHA standards and the person who cleans or launders the protective clothing or equipment is informed in writing of the potentially harmful effects of exposure to lead, inorganic arsenic and cadmium. Removal of the lead, inorganic arsenic or cadmium should not be done by blowing, shaking or any other means which disperses contaminants into the air.

14.2 Change Rooms

Clean change rooms are provided for employees, contractors, and visitors and equipped with separate storage facilities for protective work clothes and equipment and for street clothes which prevents cross-contamination.

Respirators are required to be worn while the employee is in the dirty locker room and specifically while removing contaminated clothing.

Only authorized personnel are allowed to remove clothing and/or equipment from change rooms.

14.3 Showers

Employees who work in areas where their airborne exposure to lead, arsenic or cadmium is above the PEL and/or work in regulated areas or are subject to the possibility of skin or eye irritation from inorganic arsenic are required to shower at the end of the work shift. More frequent showering may be required. Employees required to shower will not leave the plant facility wearing any clothing or equipment worn during the work shift.

14.4 Boot Wash and Vacuum Areas

At all exits from contaminated areas, facilities are provided for employees to vacuum their protective clothing and clean their shoes before they enter the change rooms, lunch rooms or shower rooms.

14.5 Decontamination Procedures for Emergency Response Personnel

1. Showers will be available for all emergency response personnel.

2. Ecobat will launder, clean, or dispose of any protective clothing utilized by emergency response personnel that is, or may be, contaminated.

14.6 Decontamination Procedures for Acids and Caustics

Ecobat uses a variety of acidic and caustic materials ranging from dilute to concentrated substances. Ecobat requires chemically resistant personal protective equipment (PPE) to be donned when working with acidic and caustic substances. Eyewashes and showers are located in areas where workers have the potential to encounter acids and caustics. PPE can be decontaminated using water to dilute the substance. Acids can be further neutralized using soda ash (for acids) or lime; the acid should first be diluted with water. Bases (caustics) can be further neutralized using a dilute acid; the caustic should first be diluted with water.

The first step should be to wash off the PPE at a nearby shower. Remove the PPE using caution to avoid worker contact with contaminants during removal of the PPE. PPE can be further decontaminated using water and sent to sanitation for laundering. If PPE is compromised, or cannot be decontaminated properly, dispose of the PPE in accordance with Site procedures.

Should an employee be exposed to acids or caustics, wash/rinse the affected skin area for at least 15 minutes. Follow-up the water wash by applying a clean, soft cloth soaked in ice-water. Continue to apply the ice-cold compresses until told to stop by a physician. The ice-cold compresses will "pull" the heat away from the burn area and minimize further damage to the skin tissue. After initial decontamination and treatment, employees should shower to further dilute / remove any chemical exposure unless medical attention is necessary.

15.0 BOMB THREATS

The person receiving a telephoned bomb threat will proceed as follows:

1. Record all information on the Bomb Threat form (see following page).

2. Note date and exact time of call.

3. Write the exact words spoken by the caller.

4. Note any distinctive characteristics of the caller (e.g.: age, sex, accent, etc.).

5. Note any background noises which might indicate the origin of the call (e.g.: motors running, music, baby crying, etc.).

6. If possible, ask specific questions which could be helpful in locating the bomb, or identifying a hoax (e.g.: time of detonation, location, etc.).

7. As soon as the caller hangs up, notify the Emergency Coordinator. Follow any further instructions given by the Emergency Coordinator.

The Emergency Coordinator, upon receiving notification of a bomb threat, will proceed as follows:

1. Evaluate the available information. If deemed necessary, order an immediate evacuation of the premises.

2. Notify local authorities, as appropriate.

3. Notify the corporate office of the circumstances.

4. If an evacuation is ordered, initiate shutdown of all production units. Shut off all pipelines and electrical service.

5. Upon a thorough assessment of the circumstances, and after consultation with appropriate authorities, initiate a search for the explosive device(s).
   (A) Utilize personnel familiar with the area(s) to be searched.
   (B) Maintain communication between individuals performing the search and a central control point using in-plant telephone lines.
   (C) If a suspected bomb is discovered, continue searching for additional devices.

   DO NOT TOUCH OR MOVE THE BOMB IN ANY MANNER.

   (D) Removal and/or handling of the suspected bomb(s) will be left to trained authorities.

65 Ballard Road
Middletown NY 10941

BOMB THREAT REPORT

Instructions: Listen. Do not interrupt the caller except to ask:

When will it go off? Certain Hour: _____ Time Remaining: _____
Where is it planted? Building: _____ Area: _____
What does it look like? _____

Did caller appear familiar with plant or building by their description of the bomb location? _____

Name of Operator **Time of Call** **Date**

Write out the message in its entirety as received from the caller:

Caller's Identity

Sex: ___Male ___Female Approximate Age: _____Years

Origin of Call

_____ Local _____ Long Distance _____ Booth _____ Internal (within plant) ___ Extension

VOICE CHARACTERISTICS			SPEECH			LANGUAGE		
Loud	_____	Soft	Fast	_____	Slow	Excellent	_____	Good
High Pitch	_____	Deep	Distinct	_____	Distorted	Fair	_____	Poor
Raspy	_____	Pleasant	Stutter	_____	Nasal	Foul	_____	Other
Intoxicated	_____	Other	Slurred	_____	Other	Explain:	_____	
Explain:	_____		Explain:	_____		Use of certain words or phrases:		

ACCENT			MANNER			BACKGROUND NOISES		
Local	_____	Not Local	Calm	_____	Angry	Office Machines	_____	Street Traffic
Foreign	_____	Regional	Rational	_____	Irrational	Factory Machines	_____	Airplanes
Race	_____	Other	Coherent	_____	Incoherent	Bedlam	_____	Trains
Explain:	_____		Deliberate		Emotional	Animals	_____	Voices
			Righteous	_____	Laughing	Quiet	_____	Music
						Mixed	_____	Party
						Atmosphere		

OTHER RELEVANT INFORMATION:

NOTIFY THE EMERGENCY COORDINATOR IMMEDIATELY. FOLLOW THEIR INSTRUCTIONS.

APPENDIX A

IDENTIFICATION OF HAZARDOUS MATERIALS

IDENTIFICATION OF HAZARDOUS MATERIALS

As specified in NFPA Standard 704M, the hazards of particular materials are described in the following terms:

Health Hazard: any property of a material which either directly or indirectly can cause injury or incapacitation, either temporary or permanent, for exposure by contact, inhalation, or ingestion. The degree of health hazard under fire conditions is described as follows:

1. Very short exposure could cause death or major residual injury even though prompt medical treatment was given. Too dangerous to be approached without specialized protective equipment.

2. Short exposure could cause serious temporary or residual injury even though prompt medical treatment was given.

3. Intense or continued exposure could cause temporary incapacitation or possible residual injury unless prompt medical treatment is given.

4. Exposure would cause irritation but only minor residual injury even if no treatment is given.

5. Exposure under fire conditions would offer no hazard beyond that of ordinary combustible material.

Flammability Hazard: the degree of susceptibility of the material to burning. The degree of flammability hazard is described as follows:

1. Will rapidly or completely vaporize at atmospheric pressure and normal ambient temperature or is readily dispersed in air, and will burn readily.

2. Can be ignited under almost all ambient temperature conditions.

3. Must be moderately heated or exposed to relatively high ambient temperatures before ignition can occur.

4. Must be preheated before ignition can occur.

5. Will not burn.

Reactivity (instability) Hazard: the degree or susceptibility to release energy, either by itself or in combination with other materials. The degree of hazard considers ease, rate, and quantity of energy release, as follows:

1. Readily capable of detonation or of explosive decomposition or explosive reaction at normal temperatures and pressures.

2. Capable of detonation or of explosive decomposition or explosive reaction, but requires a strong initiating source or must be heated under confinement before initiation; or, reacts explosively with water.

3. Normally unstable and readily undergoes violent chemical change but does not detonate; or, may react violently with water or may form potentially explosive mixture with water.

4. Normally stable, but can become unstable at elevated temperatures and pressures or may react with water with some release of energy but not violently.

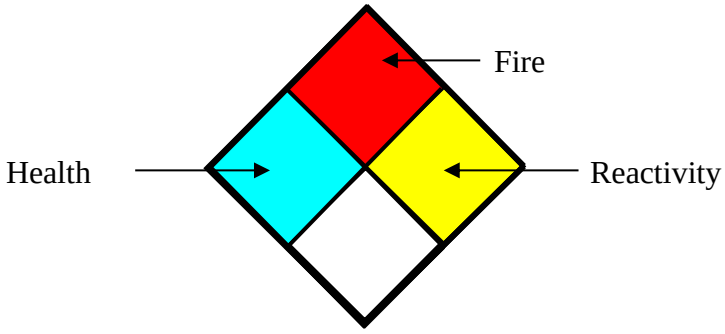
5. Normally stable, even under fire exposure conditions, and is not reactive with water.

Supplemental Information:

~~W~~ Unusual reactivity with water; possible hazard in using water for firefighting.

OXY Oxidizing material.

NFPA 704 PLACARD:



APPENDIX B

ARSINE AND STIBINE DATA SHEETS

ARSINE

I. PHYSICAL PROPERTIES

A. Arsine (AsH_3) exists as a colorless gas having a disagreeable garlic-like odor at concentrations of less than 1 ppm. This material is formed from the reaction of inorganic arsenic and nascent hydrogen. This material is extremely poisonous - the characteristic odor cannot be considered a suitable warning property.

B. Melting point: -178.6°F

C. Boiling Point: -80.5°F

II. OCCUPATIONAL EXPOSURE PROTECTION

A. Permissible Exposure Limit (PEL): 0.05 ppm; NIOSH recommends a PEL of 0.003 ppm for AsH_3

B. Immediately Dangerous to Life or Health (IDLH): 6 ppm

C. Personal protective equipment: The plant requirements of safety glasses, goggles or face shields should prevent damage to the eyes from low exposures. This material is not absorbed through the skin, consequently, the standard plant uniform should provide sufficient protection from this route of entry.

D. Respiratory protection: Self Contained Breathing Apparatus (SCBA) must be used for protection against this gas. Negative pressure respirators commonly worn in the plant will not provide sufficient protection. SCBA's, in the pressure demand mode only, must be worn whenever the concentration of arsine is greater than the PEL of 0.05 ppm.

If a garlic-like odor is detected: Leave the Area Immediately and Notify the Supervisor.

III. BIOLOGICAL EFFECTS

A. Local effects from high concentrations of AsH_3 will be limited to damage to the eyes. However, systemic effects will most probably occur before this happens.

B. Systemic effects due to inhalation of high concentrations may be fatal. Acute poisoning is characterized by general malaise, apprehension, giddiness, headache, shivering, thirst, and abdominal pain with vomiting. These effects should appear within one or two hours of exposure. Severe cases may show blood in vomit and diarrhea as well as some pulmonary edema. Where exposure does not result in immediate death, poisoning is characterized by a discoloration of the urine to a deep red (hemoglobinuria), followed by jaundice, coloring of the entire body to a deep

bronze on the second or third day with evidence of a severe hemolytic type anemia. Eventually, severe renal damage will result in complete suppression of urinary function, leading to uremia and death. Cardiac and severe hepatic damage as well as EKG changes are not uncommon. Recovery is slow following chronic exposures.

Cases of acute exposures to small amounts of arsine may be indicated if some hemoglobin is excreted unchanged by the kidneys. The only other symptoms noted in cases of this sort may be a general tiredness, pallor, breathlessness and palpitations expected with severe secondary anemia.

C. Emergency treatment is restricted to artificial respiration if breathing is arrested. Any of the symptoms previously described require medical attention as quickly as possible.

STIBINE

I. PHYSICAL PROPERTIES

A. Stibine (SbH_3) is a colorless gas having a disagreeable odor (similar to rotten eggs). It is formed by dissolving a zinc-antimony or magnesium-antimony alloy in dilute hydrochloric acid. This gas is less stable than arsine, will slowly decompose at room temperature and is quickly destroyed at 392°F. Stibine is slightly soluble in water. This material is incompatible with acids, halogenated hydrocarbons, oxidizers and moisture.

B. Melting point: -126°F

C. Boiling point: -1°F

II. OCCUPATIONAL EXPOSURE PROTECTION

A. Permissible Exposure Limit (PEL): 0.1 ppm

B. Immediately Dangerous to Life or Health (IDLH): 40 ppm

C. There are no special requirements for personal protective clothing other than the standard plant uniform, glasses with side shields and approved head gear.

D. Respiratory protection: Self Contained Breathing Apparatus (SCBA), in pressure demand mode only, must be worn whenever the concentration of stibine is greater than the PEL of 0.1 ppm.

If the presence of this material is suspected, extreme caution must be exercised in order to limit the possibility of exposure. If the presence of this material is suspected the employee must notify the foreman or supervisor and Leave The Area Immediately.

III. BIOLOGICAL EFFECTS

A. No local effects have been noted with exposure to stibine.

B. Systemic

The effects due to inhalation of the gas are acute. Chronic poisoning has not been reported. The effects of stibine poisoning are generally described as severe headache, nausea, weakness, abdominal and lower back pain, slow breathing and a weak irregular pulse. These effects result from stibine being a powerful hemolytic and central nervous system poison.

Clinical symptoms of poisoning are reported as hemoglobinuria and hemolytic anemia. Death is generally preceded by jaundice and anuria. Employees should be advised to report to the nurse if a red or dark urinary discharge is noticed. This may be an indication of stibine poisoning.

C. Emergency treatment on site will probably be for respiratory collapse, in which case artificial respiration should be administered. In cases of suspected stibine overexposure, get medical attention as soon as possible.

APPENDIX C

SARA EMERGENCY NOTIFICATION PROCEDURES

SARA EMERGENCY NOTIFICATION PROCEDURES

The following procedures are specifically required under the Superfund Amendment and Reauthorization Act - Title III. These requirements apply to any facility at which a hazardous chemical is produced, used or stored and at which there is release of a reportable quantity of any extremely hazardous substance or CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) hazardous substance. This reporting requirement does not apply to a release solely within the boundaries of the facility, "continuous" release or an exempt release.

The procedures are mandated by 40 CFR 355.

1. The primary emergency coordinator or the alternate emergency coordinator will immediately notify the community emergency coordinator for the local planning committee and the state emergency response commission of any state likely to be affected by the release. This notification shall include:
   A. The chemical name or identity of any substance involved in the release.

   B. If the substance is an extremely hazardous substance.

   C. Estimate of the quantity of any such substance that was released into the environment.

   D. Time and duration of the release.

   E. Medium or media into which release occurred.

   F. Any known or anticipated acute or chronic health risks associated with the emergency and, where applicable, advice regarding medical attention necessary for exposed individuals.

   G. Precautions to take as a result of the release, including evacuation.

   H. Name and telephone number of the person or persons to be contacted for further information.

2. A written follow-up emergency notice or notices will be sent as soon as practicable to the local committee updating the above information and including the following additional information:

   A. Action taken to respond to and contain the release.

   B. Any known or anticipated acute or chronic health risks associated with the release.

C. Advice regarding medical attention to exposed individuals, when applicable.

In the case of a transportation related release, this notification may be met by providing the above listed information to the 911 operator or to the operator if a 911 system is not present.

65 Ballard Road
Middletown NY 10941

NEW YORK

STATE:

To notify of emergency releases (includes transportation spills within the state of NY):

(800) 457-7362
Follow-up Report:

NYS DEC
Spill Bureau
Albany, NY 12233

LOCAL: **Town of Wallkill** - Office of Emergency Management
99 Tower Drive
Middletown, N.Y. 10941
845-692-6757

ADDITIONAL GOVERNMENTAL AGENCIES:

NYS Department of Environmental Conservation
21 South Putt Corners Road
New Paltz, NY 12561
(845) 256-3000

In Case of Emergency Notify Nearest Conservation Office

Environmental Conservation Officer (ECO) Region 3
(845) 256-3013

Division of Air: (845) 256-3045

NYS Department of Transportation
Albany, NY
(518) 457-6195

24 Hour Hotline (In Case of Spills ONLY): (800) 457-7362

National Response Center: (800) 424-8802

SARA NOTIFICATION:

Department of Environmental Conservation Spill Hotline: (800) 457-7362

US Environmental Protection Agency
290 Broadway
New York, NY 10007

General Information: (877) 251-4575
24 Hour Response Line: (800) 424-8802

APPENDIX D

CONTINGENCY PLAN - EMERGENCY PROCEDURES

CONTINGENCY PLAN - EMERGENCY PROCEDURES

1. Emergency Procedures

In addition to the procedures and actions outlined in this plan, the following procedures are specifically required under RCRA (Resource Conservation and Recovery Act) "to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water."

These procedures are mandated by 6 NYCRR 373-2.4 (g) and 40 CFR 264.56, under the circumstances noted above.

(1) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or the emergency coordinator's designee when the emergency coordinator is on call) must immediately:

(i) activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and

(ii) notify appropriate State or local agencies with designated response roles if their help is needed.

(2) Whenever there is a release, fire, or explosion, the emergency coordinator will immediately identify the character, exact source, amount and aerial extent of any released materials to the extent possible. The emergency coordinator may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis. In the event of an emergency, the emergency coordinator will identify any spilled material through knowledge of the process, communication with employees having knowledge of the material, shipping papers, Safety Data Sheets and/or container markings. Unknown materials spilled (i.e., wastes) will be characterized as outlined in Ecobat's RCRA Part 373 Permit Waste Analysis Plan.

(3) Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions). An emergency may be considered hazardous based on the known or unknown characteristics of the material spilled or released, the extent of the release, the containment of the material and the potential exposure to employees, the general public or the environment.

(4) If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health or the environment outside the facility, the findings must be reported as follows:

(i) If the emergency coordinator's assessment indicates that evacuation of local areas may be advisable, appropriate local authorities must be immediately notified. The emergency coordinator must be available to help appropriate officials decide whether local areas should be evacuated.

(ii) The emergency coordinator must immediately notify both the department (using the New York State 24-hour oil and hazardous material spill notification number (518) 457-7362) and either the government official designated as the on-scene coordinator for that geographical area (in the applicable regional contingency plan under 40 CFR Part 300 (see 6 NYCRR 370.1(e)), or the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include:

('a') name and telephone number of reporter;

('b') name and address of facility;

('c') time and type of incident (e.g., release, fire);

('d') name and quantity of material(s) involved, to the extent known;

('e') the extent of injuries, if any; and

('f') the possible hazards to human health, or the environment, outside the facility.

(5) During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

(6) If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

(7) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. Waste that has been released will be remediated by Ecobat personnel or an outside contractor depending upon the ability of Ecobat personnel to handle the remediation and the extent of the remediation. Waste that is remediated by Ecobat personnel may be stored in the containment building for processing, may be processed through Ecobat's wastewater treatment plant, or may be properly containerized in a roll-off, vacuum truck, steel or plastic drums or other USDOT approved container for treatment and disposal and stored in a hazardous waste accumulation area. Ecobat will follow the procedures outlined in the RCRA Part 373 Waste Analysis Plan and Operations Plan for storage and disposal of the material. Waste that is cleaned up by an outside contractor will follow appropriate NYSDEC and USEPA protocols.

(Comment: Unless the owner or operator can demonstrate, in accordance with section 371.1(d)(3) or (4) of this Title, that the recovered material is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements of Part 372 of this Title and this Subpart).

(8) The emergency coordinator must ensure that, in the affected area(s) of the facility:

(i) no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and

(ii) all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed. Any equipment used during an emergency will be decontaminated and/or replaced depending upon the extent of contamination. The majority of contamination (i.e., lead) at Ecobat can be removed using a pressure washer.

(9) The owner or operator must notify the commissioner, and appropriate State and local authorities, that the facility is in compliance with paragraph (8) of this subdivision before operations are resumed in the affected area(s) of the facility.

(10) The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, the owner or operator must submit a written report on the incident to the commissioner. The report must include:

(i) name, address, and telephone number of the owner or operator;

(ii) name, address, and telephone number of the facility;

(iii) date, time, and type of incident (e.g., fire, explosion);

(iv) name and quantity of material(s) involved;

(v) the extent of injuries, if any;

(vi) an assessment of actual or potential hazards to human health or the environment, where this is applicable; and

(vii) estimated quantity and disposition of recovered material that resulted from the incident.

2. Agreements with Emergency Responders

Ecobat does not have a formalized agreement with local emergency responders. Attempts have been made to make emergency agreements and a copy of this plan has been sent to these agencies (see list below). Efforts have been made to familiarize the local fire department with the facility through outreach and on-site meetings. In the past, emergency responders have supported Ecobat

during actual emergencies that have resulted from fires, and/or personal injury incidents at the facility. Copies of the contingency plan are submitted annually (and whenever the plan is amended) to the local fire department, hospital and local emergency response teams.

The owner or operator must attempt to make the following arrangements as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations:

(i) arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes;
Ecobat currently provides all agencies with copies of its written Emergency Preparedness/Contingency Plan to meet this requirement.

(ii) where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority; The New York State Fire Mutual Aid Plan meets the requirement for agreements between responding agencies and all certified emergency response agencies must sign that agreement.

(iii) agreements with State emergency response teams, emergency response contractors, and equipment suppliers; The state emergency response teams would also be part of the New York State Fire Mutual Aid Plan and be required to respond if requested by the agency with authority. Ecobat uses several emergency response contractors and they agree to provide service for a fee.

(iv) arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility. The local hospital, Garnet Health Medical Center is also provided a copy of the Ecobat written Emergency Preparedness/Contingency Plan.

(2) Where local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record. Volunteer Fire Departments in New York State do not enter into written agreements with facilities, however, they are required by law to respond. Once their alarm has sounded they are required to respond and should they fail to respond the New York State Fire Mutual Aid System automatically dispatches the next available department to that call.

Ecobat provides all of the following agencies with written copies of its Emergency Preparedness/Contingency Plan

Local Fire Department
Silver Lake Volunteer Fire Department
26 Maltese Drive
Middletown, NY 10940

Town of Wallkill – Director of Emergency Management
99 Tower Drive – Building A
Middletown, NY 10941

Town of Wallkill Police Department
99 Tower Drive
Middletown, NY 10941

New York State Police – Troop F
55 Crystal Run Road
Middletown, New York 10941

Orange County LEPC
22 Wells Farm Road
Goshen, NY 10924

Garnet Health Medical Center
707 East Main Street
Middletown, New York 10940

The above agencies are the primary responders in the event of an emergency. In an emergency situation, the fire department is generally the first to respond. The 911 center will automatically dispatch appropriate agencies depending upon the emergency reported. The primary responders will establish incident command.

3. Emergency Notification

The Vice President of Operations will function as the primary Emergency Coordinator should an emergency arise. In the absence of the Vice President of Operations, a Director (Assistant Plant Manager), or a designated Alternate Emergency Coordinator, will fulfill this function. The following Emergency Notification List includes the names and telephone numbers of key personnel. In the event of an emergency, the person discovering the issue shall immediately notify the Emergency Coordinator or his designated alternate. This person shall act as the Emergency Coordinator until such time as they are relieved by someone on the Notification List.

At all times, at least one of the individuals listed on the Emergency Notification List must be present at the facility or on call to respond to emergencies. These individuals must maintain a thorough familiarity with this plan, the layout, operations, and activities of the facility, the locations and characteristics of hazardous materials at the facility and the locations of records at the facility. Each of these individuals, when acting as the Emergency Coordinator, has the authority to commit the resources necessary to carry out this plan.

The Agency Liaison, or his alternate, must be contacted as soon as possible any time this plan is implemented. The Agency Liaison is responsible for making all notifications to regulatory agencies.

The Emergency Notification List is posted in the guard house and all managers are provided copies for posting in their respective areas. A copy of the complete plan is in the main office and kept electronically.

4. Emergency Equipment

A. Fire Protection

Portable 10 pound, ABC, multi-purpose extinguishers are located throughout the facility. The location of each extinguisher is marked by a sign. The facility plot plan in Appendix K designates the locations of all portable fire extinguishers.

Water is supplied to the facility by the Town of Wallkill. Adequate water volume and pressure are available to operate fire-fighting equipment. Fire hydrants are located at the northwest entrance from Ballard Road and at the southeast railroad gate to the facility.

A facility Evacuation/Fire Alarm System is maintained at the facility and is used to notify employees in the event of an emergency. The location of the fire alarm activation (pull stations) is identified in the facility plot plan in Appendix K. The fire alarm system is the primary communication medium for notifying employees that an emergency exists and the need to evacuate the facility. Once the evacuation/fire alarm system has been activated, additional communications can be maintained via the plant two-way radio system.

Air horns are used to facilitate internal and emergency communication to better respond to localized emergencies. Emergency Air Horns have been located at satellite waste accumulation areas that are not located near a hardwired phone or base station radio. Their primary function is to enable employees to immediately alert the plant when there is an emergency with one of our waste accumulation areas (ex: a spill requiring immediate attention). However, these air horns should also be used for any emergency situation when immediate help is required and other means of communication (e.g.: a radio) is unavailable.

B. Spill Containment

The following tools and equipment are available for use in confining and controlling spills of hazardous materials

1. Front-end loaders.

2. Shovels, squeegees, brooms, Tennant Sweepers, etc.

3. A supply of absorbent material is available for use in the containment of any chemical spill. These materials are located in numerous areas around the plant. Overpak drums are available for spilled materials or leaking containers.

4. Above ground tanks in the wastewater treatment facility are surrounded by containment walls which are capable of holding the entire capacity of the tanks if spillage or leakage occurs. In case of a leak or spill from a tank the material is pumped from the secondary containment system and treated at the on-site water treatment facility.

5. A rainwater collection and treatment system with the capacity to withstand a 24-hour maximum probable storm is in place at the facility. This system prevents runoff, flooding and the contamination of water supplies.

C. Miscellaneous

The following additional emergency equipment is maintained at the facility for emergency use;

1. Burn kits, medical kits, and resuscitators are stored in the cabinet outside the lab.

2. Emergency lighting units are located throughout the facility.

3. Eyewashes and drench showers are located throughout the facility.

4. In the event of a power failure, diesel powered emergency generators supply electricity to the entire facility with the exception of the water treatment operation.

5. Safety data sheets (SDS's) for the chemicals found in the facility are located in the network computer system accessible from all computers and are backed up on a flash drive for access on a laptop if systems are down.

5. Evacuation Plan

In the event a total evacuation is ordered, all personnel will proceed to the nearest available exit. All exits are designated on the enclosed evacuation route maps. Individual departments will

designate a primary and alternate exit; the locations of these exits will be made known to all employees. A copy of the plant evacuation route is posted at the facility.

After departing the building, main plant personnel will assemble by department at the designated location in the employee parking lot. Other evacuation areas may be designated by the Emergency Coordinator if necessary. Employees working at the WESP building will assemble at the fire hydrant (noted on the plot plan) at the north east corner of the WESP building. Once at the rally point headcount and radio communication will verify all have exited the building safely. Alternate evacuation assembly points will depend on the specific emergency situation, location of the emergency, wind direction, etc. Ecobat may use the front lawn or east parking lot as alternate evacuation assembly points. Each supervisor will immediately account for all personnel under their direct supervision. Upon completion of the head count, the supervisor will communicate the results to the Emergency Coordinator or his alternate.

No employee shall be permitted to depart the facility without approval of the Emergency Coordinator or his designated alternate.

Any evacuation off site will be organized by the Facility Emergency Coordinator.

APPENDIX E

PLANT CHEMICAL LISTING

Ecobat Resources New York, LLC
6/7/2023

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6/3/2015

00081 **Acetic Acid Glacial (9375)** **24**
Avantor Performance Materials, Inc.
4/11/2018

04530 **Acetic Acid GR ACS** **25**
EMD Chemicals, Inc.
12/7/2018

03769 **Acetic Acid, Glacial (S010601)** **26**
Seastar Chemicals Inc.
7/1/2014

06049 **Acetone** **27**
Univar
8/31/2015

04524 **Acetone (13-260)** **28**
Recochem Inc.
7/6/2015

00086 **Acetone, NF (AC115)** **29**
Spectrum Chemicals and Laboratory Products, Inc.
4/4/2018

05001 **Acrylc 1-GL 2PK 5200 Safety Yellow (5244402)** **30**
Rust-Oleum Corporation
8/3/2015

05197 **Activated Charcoal** **31**
Sigma Chemical Company
12/1/2014

06109 **Advanced Antibacterial Clean & Smooth** **32**
Ecolab Inc.
9/13/2016

03842 **Air Brake System Anti-Freeze & Rust Guard (M2832)** **33**
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00121 **Air, Compressed (001002)** **34**
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2/3/2018

06583 **Alconox** **35**
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10/18/2017

05294 **All Purpose Antibacterial Cleaner** **36**
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2/12/2016

05137 **Almond Spray Paint** **37**
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8/25/2014

05148 **Alpha NiCd KPX** **38**
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03796 **Aluminum Standard (ICP-013)** **39**
Ultra Scientific
10/20/2016

06155 **AM1949 Part A** **40**
American Coating Technologies
5/11/2016

06152 **AM1949 Part B** **41**
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5/12/2016

06581 **AMI-TUF SGL, SCGL & SGLHB Series including LCF SUFFIX** **42**
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5/23/2014

06369 **Ammonium Hydroxide, ACS Reagent Grade** **43**
Cole-Parmer
5/14/2018

06368 **Ammonium Sulfate** **44**
Fisher Scientific
1/23/2018

05883 **AMP** **45**
EnviroTech Services, Inc.
2/12/2016

06064 **AMSOIL Synthetic Polymeric Off-Road Grease, NLGI#2** **46**
AMSOIL INC.
10/1/2016

05150 **Ansmann NiMH Battery** **47**
ANSMANN USA Corporation
6/17/2011

06673 **Anthracite Coal** **48**
Mid-Continent Coal & Coke Co.
1/1/2021

00201 **Anti-Seize Lubricant 133AR** **49**
Henkel Loctite Corporation

8/19/1997

05100 **Antibacterial Lotion Hand Soap (924796-11)** **50**
Ecolab Inc.
9/15/2017

05890 **Antimony** **51**
Aaron Ferer & Sons Co.
6/11/2015

06277 **Antimony Ingot** **52**
GMIT International Limited
5/11/2015

00222 **Antimony, 1,000 Micro/mL or 10,000 (6441)** **53**
Avantor Performance Materials, Inc.
10/23/2014

05098 **Antislip Cleaning & Etching Solution (108402)** **54**
Rust-Oleum Corporation
8/6/2018

05339 **Anytime Clean & Polish - Woodland Fresh 16 oz Trigger Spray** **55**
The Valspar Corporation
9/15/2015

05885 **Apogee** **56**
EnviroTech Services, Inc.
4/12/2016

03593 **AQ 611** **57**
Aquamark, Inc.
6/19/2013

05686 **Aqua-Gel II Utility Cable Pulling Lubricant** **58**
IDEAL Industries, Inc.
6/7/2015

00122 **Arcair Air Carbon Arc Electrodes** **59**
Specialised Welding Products Ltd
2/15/2017

00251 **Argon (001004)** **60**
Airgas USA, LLC
4/11/2019

06240 **ARMORSEAL EXPRESSPATCH Fast Dry Urethane (Part B) Hardener** **61**
The Sherwin-Williams Company
9/6/2017

CRC Industries, Inc.
10/12/2017

04949 **Battery, Wet, Filled with Acid** **75**
RAMCAR Batteries, Inc.
8/1/2014

02814 **Battery, Wet, Filled with Acid** **76**
U.S. Battery Mfg. Co.
9/18/2015

05727 **Battery, Wet, Non-Spillable / Absorbed Glass Mat (AGM) Battery / Sealed Lead-Acid (SLA) Battery** **77**
Interstate All-Battery
10/1/2016

04430 **Belt Dressing (C124-6)** **78**
Cyclo Industries, LLC
1/4/2018

04998 **Belzona 1111 (Super Metal)-Base** **79**
Belzona Inc.
4/1/2011

05143 **Bird-OFF Gel Pigeon & Bird Repellent** **80**
Bird-OFF Gel USA, LLC
6/15/2015

05289 **Blended Quicklime** **81**
Carmeuse North America
5/20/2015

05891 **Body Wash & Shampoo** **82**
Simoniz USA, Inc.
4/10/2015

06402 **Borax Decahydrate (005-011-01-1)** **83**
American Borate Company
12/1/2018

05911 **Boris Acid** **84**
SQM North America
5/1/2008

02595 **Buffer pH 10.0, Blue** **85**
VWR
5/4/2015

02594 **Buffer pH 4.0, Red** **86**
VWR
5/4/2015

03761 **Buffer pH 7.0, Yellow** **87**

Amalgamet Canada LP 1001
1/2/2015

03797 **Calcium Standard (ICC-103)** **101**
Ultra Scientific
4/7/2014

00461 **Carboguard 890 Part A (0986A1NL)** **102**
Carboline Company
3/25/2019

05237 **Carboguard 890 Part B (0986B1NL)** **103**
Carboline Company
3/25/2019

05238 **Carbomastic 615 Part A (1049A1NL)** **104**
Carboline Company
2/26/2019

05239 **Carbomastic 615 Part B (1049B1NL)** **105**
Carboline Company
2/26/2019

00468 **Carbon Dioxide** **106**
Air Products and Chemicals, Inc.
8/1/2016

06677 **Carbon Dioxide, Solid** **107**
Continental Carbonic Products, Inc.
5/8/2014

06141 **Cast Iron Scrap** **108**
The David J. Joseph Company
5/18/2015

05476 **Caustic 50%** **109**
Slack Chemical Co., Inc.
4/27/2015

00491 **Caustic Potash Standard Flake** **110**
Diamond Shamrock Chemicals Company
5/13/1986

06341 **Caustic Potash, Caustic Potash Flake, Caustic Potash Walnut, Caustic Potash 90%, Caustic Potash Briquettes 90%** **111**
ASHTA Chemicals Inc.
4/15/2016

05731 **Caustic Soda Beads** **112**
Axiall, LLC
5/17/2016

03727 **Caustic Soda Liquid 50%** **113**

06524 **Ingersoll Rand Ultra Coolant** **321**
Ingersoll Rand
5/21/2015

06726 **Inswool Moldable** **322**
HarbisonWalker International
1/20/2020

04406 **Intercool NFP (24220) - MSDS ONLY** **323**
Interstate Chemcial Company, Inc.
7/15/2013

02714 **Internal Std Mix (SM-1112-009)** **324**
High Purity Standards
8/1/2013

03815 **Iodine (AC423820000)** **325**
Fisher Scientific
6/8/2016

06353 **Iodine GR ACS** **326**
EMD Millipore Corporation
6/20/2017

04003 **Iron Pyrite** **327**
Prince Minerals, Inc.
11/21/2014

04032 **Iso-Propyl Alcohol (PX1830)** **328**
EMD Chemicals, Inc.
9/14/2018

06382 **Isoclene 250ml Pump Spray** **329**
5/24/2016

06158 **Isopropyl Alcohol** **330**
TSI Incorporated
3/6/2015

06661 **Isopropyl Alcohol 70%** **331**
VWR International LLC
00/00/00

05256 **Jasco Paint Thinner** **332**
W. M. Barr
4/21/2015

03799 **Jet Force Wasp & Hornet Killer (0766_005)** **333**
Claire Mfg.
1/26/2015

12/5/2018

06346	**Loctite 515 Gasket Maker** Henkel Corporation 8/24/2016	**373**
06553	**Loctite 567 TB 250ML EN (2087069)** Henkel Corporation 10/4/2019	**374**
06062	**Loctite 609 Retaining Compound** Henkel Corporation 11/8/2016	**375**
06671	**Loctite 680 Retain CMPND 10ML** Henkel Corporation 8/17/2017	**376**
06610	**Loctite EA 445 Hardener (701941)** Henkel Corporation 4/16/2018	**377**
06059	**Loctite EA 9480 Underwater Epoxy know as Fixmater Underwater Repair** Henkel Corporation 10/1/2014	**378**
05571	**Loctite LB 8008 C5-A Known as C5-A Copper Based Anti-Seize** Henkel Corporation 3/8/2017	**379**
05303	**Loctite LB 8060** Henkel Corporation 10/28/2014	**380**
05301	**Loctite LB 8065 Copper Anti-Seize Stick** Henkel Corporation 8/28/2014	**381**
06611	**Loctite LB 8150 SV A/S** Henkel Corporation 6/14/2019	**382**
06080	**LOCTITE PC 7257 known as Fixmaster(R) Magna-Crete(R)** Henkel Corporation 5/13/2014	**383**
06081	**Loctite PC 7257 known as Fixmaster(R) Magna-Crete(R)** Henkel Corporation 6/11/2014	**384**

7/31/2014

06079	**MOBIL DELVAC 1300 SUPER 10W-30** Exxon Mobil Corporation - Spring, TX 6/1/2016	**411**
03603	**Mobil DTE Oil BB (201560501520)** Exxon Chemical Company 11/25/2014	**412**
06712	**MOBIL DTE OIL LIGHT** Exxon Mobil Corporation - Spring, TX 3/16/2015	**413**
01320	**Mobil Rarus 824 (201560203005)** Exxon Mobil Corporation - Spring, TX 3/17/2015	**414**
03801	**Mobil SHC 627** Exxon Mobil Corporation - Spring, TX 2/11/2019	**415**
05928	**Mobil SHC 630** Exxon Mobil Corporation - Spring, TX 2/11/2019	**416**
05308	**Mobil SHC 634** Exxon Mobil Corporation - Spring, TX 2/15/2019	**417**
06711	**Mobilgear 600 XP 220** ExxonMobil Chemical Company 10/6/2021	**418**
03604	**Mobilgear 600 XP 320 (201560401225)** Exxon Mobil Corporation - Spring, TX 3/25/2019	**419**
01333	**Mobilgear 636 (201560401030)** Exxon Mobil Corporation - Spring, TX 3/17/2015	**420**
01334	**Mobilgrease 28 (201550402020)** Exxon Chemical Company 11/14/2014	**421**
05033	**Mobilgrease CM-S (2015A0106060)** Exxon Chemical Company 11/25/2014	**422**
05032	**Mobilgrease CM-W (2015A0106070)** Exxon Chemical Company	**423**

11/25/2014

01335 **Mobilgrease Special (2015A0106075)** **424**
Exxon Chemical Company
11/25/2014

04188 **Mobilith SHC 1500 (2015A0204080)** **425**
Exxon Chemical Company
10/12/2018

03703 **Mobilmet S-122 (201570301518)** **426**
Exxon Chemical Company
3/16/2015

01337 **Mobiltemp 1** **427**
Exxon Mobil Corporation - Spring, TX
3/17/2015

02625 **Mobiltrans HD 30 (201520506030)** **428**
Exxon Chemical Company
11/25/2014

01350 **Molylube Anti-Seize Compound (301082)** **429**
Calumet Branded Products, LLC
12/27/2017

04925 **Morado Super Cleaner (0856)** **430**
Zep Commercial Sales & Service
9/25/2015

01353 **Morton Safe-T Salt** **431**
Morton Salt, Inc.
4/21/2014

03821 **Muriatic Acid (7-23 deg. Baume/15-38%) (0130)** **432**
Axiall, LLC
6/16/2014

05478 **Muriatic Acid 20-37%** **433**
Slack Chemical Co., Inc.
5/3/2015

01368 **Murphy Oil Soap Liquid-Original (200000017771)** **434**
Colgate-Palmolive Co.
5/19/2015

05271 **Murphy's Tire and Tube Mounting Compound** **435**
Tech International
4/17/2014

06676 **Nalmet 1689** **436**
Nalco Company

4/17/2014

05737	**Napa -20 degree Windshield Washer Fluid** Southwin, Ltd. 3/27/2015	**437**
03839	**Napa Dot 3 Brake Fluid** Warren Unilube, Inc. 3/5/2014	**438**
06117	**NAPA DOT 4 Brake Fluid** Warren Unilube, Inc. 3/5/2014	**439**
06116	**NAPA DOT 5 Brake Fluid 32 FL OZ** NAPA Auto Parts 10/19/2015	**440**
05313	**NAPA Mac's Battery Terminal Cleaner** Automotive Redistribution Center 4/6/2015	**441**
03836	**NAPA Mac's Belt Dressing** Balkamp Inc. 4/6/2015	**442**
05312	**NAPA Mac's Silicone Spray Silicone Spray** Niteo Products, LLC 9/29/2015	**443**
03837	**NAPA Prem Perf SAE 5W-30** Ashland 7/31/2016	**444**
03830	**Napa SYN 10W30 QT** The Valvoline Company 9/28/2016	**445**
05205	**NAPA/CRC Brakleen Brake Parts Cleaner (Aerosol)** CRC Industries, Inc. 5/13/2015	**446**
05811	**NARMAG FG - MSDS ONLY** HarbisonWalker International 6/15/2015	**447**
06752	**National Bentonite** Bentonite Performance Minerals LLC 1/26/2021	**448**
03565	**Natural Graphite 50-84% Carbon (076) - MSDS ONLY** Asbury Graphite Mills Inc. 9/9/2014	**449**

Exxon Mobil Corporation - Spring, TX
11/28/2017

05551 **Noalox Anti Oxidant** **464**
IDEAL Industries, Inc.
4/28/2015

05307 **NOCO CJ 4 HD 15W40** **465**
Noco Energy Corp
5/29/2015

02573 **Noco Premium & Pre-Mix Antifreeze** **466**
Noco Energy Corp
3/10/2015

03846 **NOCO TDH - MSDS ONLY** **467**
Noco Energy Corp
6/1/2008

02570 **Nocolube AW Hydraulic Fluid Series** **468**
Noco Energy Corp
4/8/2015

03793 **Non-Chlorinated Brake Cleaner (M715)** **469**
Radiator Specialty Company
4/23/2015

01441 **Non-Flammable Gas Mixture: Argon/Methane (002051)** **470**
Airgas USA, LLC
1/31/2018

00309 **Non-Oxidized Asphalt (24908-NAM)** **471**
Owens Corning Roofing & Asphalt, LLC
10/5/2015

06433 **North 222 Barrier Cream** **472**
CoreTex Products, Inc.
10/9/2014

06522 **NOVO-PRIME PART A** **473**
Spartan Epoxies Ltd.
3/12/2016

06523 **NOVO-PRIME PART B** **474**
Spartan Epoxies Ltd.
3/12/2016

06520 **NOVO-TEK-V / PART A** **475**
Spartan Epoxies Ltd.
3/12/2016

06515 **Novo-Tek-V/Part A** **476**
Spartan Epoxies Ltd.

3/12/2016

06521 **NOVO-TEK-V/PART B** **477**
Spartan Epoxies Ltd.
3/12/2016

02590 **NU-22 (R-417A)** **478**
ICOR International, Inc.
4/16/2014

04528 **Nu-Brite (4291-01, 4291-05, 4291-08, 4891-08)** **479**
Nu-Calgon
2/10/2016

04896 **Oasis Pro 16 Orange Force** **480**
Ecolab Inc.
10/2/2014

05918 **Oatey Clear Primer - NSF Listed for CPVC and PVC** **481**
Oatey Co.
12/17/2014

05542 **Oatey Purple Primer - NSF Listed for PVC and CPVC** **482**
Oatey Co.
5/27/2015

05158 **Omega NiCd - MSDS ONLY** **483**
Power-Sonic Corporation
4/1/2017

01461 **Onox Solution** **484**
Onox, Inc.
1/1/2017

06625 **Original Lube-Matic Liquid** **485**
Grainger Inc.
10/6/2014

05508 **Original Sanitizer 65% Ethanol** **486**
VI-Jon, Inc.
6/15/2015

04777 **Overal SSPR 6PK Flat Black (V2404830)** **487**
Rust-Oleum Corporation
12/13/2016

05815 **OVERAL SSPR 6PK Flat White** **488**
Rust-Oleum Corporation
12/13/2016

04589 **Overal SSPR 6PK Gloss Black LOW VOC (V2402830)** **489**
Rust-Oleum Corporation
9/24/2009

05351	**Overal SSPR 6PK Gloss Blue (V2408830)** Rust-Oleum Corporation 9/4/2014	**490**
05347	**Overal SSPR 6PK Gloss Brown LOW VOC (V2411830)** Rust-Oleum Corporation 9/4/2014	**491**
04540	**Overal SSPR 6PK Gloss Green (V2410830)** Rust-Oleum Corporation 9/4/2014	**492**
04821	**Overal SSPR 6PK Gloss Orange (V2414830)** Rust-Oleum Corporation 5/10/2017	**493**
04539	**Overal SSPR 6PK Gloss Red (V2407830)** Rust-Oleum Corporation 9/4/2014	**494**
04475	**Overal SSPR 6PK Gloss White (V2403830)** Rust-Oleum Corporation 12/20/2016	**495**
04778	**Overal SSPR 6PK Gloss Yellow (V2409830)** Rust-Oleum Corporation 9/4/2014	**496**
03660	**OX-100R Reprocessed PTFE** Repro-Lon 1/1/2017	**497**
01473	**Oxalic Acid - MSDS ONLY** Lidochem 6/1/1993	**498**
01482	**Oxygen, Compressed** Air Liquide 4/9/2015	**499**
06689	**Oxygen, Refrigerated Liquid** Praxair, Inc. 10/21/2016	**500**
04588	**Painters Touch Aerosol Top Coats** Rust-Oleum Corporation 10/30/2015	**501**
06087	**Parr 7313** Edge Adhesives 11/5/2014	**502**
06069	**Pathway Herbicide**	**503**

Dow Agrosciences LLC
6/4/2015

03794 **PB Penetrating Catalyst (Aerosol) (16-PB)** **504**
The Blaster Corporation
5/26/2014

05036 **Peladow Premier Snow & Ice Melter Calcium Chloride (M48005)** **505**
Occidental Chemical Corporation
8/3/2016

05293 **PEMO Anti-Chatter Additive** **506**
BASF Corporation
8/5/2014

06436 **Penncoat 101** **507**
ErgonArmor, a division of Ergon Asphalt & Emulsions, Inc.
8/5/2016

04907 **Penntrowel 250 Resin Gray** **508**
Ergon Armor
4/17/2015

04906 **Penntrowel Epoxy Hardener** **509**
Ergon Armor
4/17/2015

04455 **Penntrowel Epoxy Primer Hardener** **510**
Ergon Armor
8/6/2015

04456 **Penntrowel Epoxy Primer Resin** **511**
Corrosion Engineering Division of ErgonArmor
11/19/2014

01495 **Peratex Bonding Mortar - MSDS ONLY** **512**
HarbisonWalker International
6/3/2010

05908 **Permatex(R) Anti-Seize Lubricant 133MA** **513**
Henkel Corporation
5/28/2015

05118 **pH Balanced Hair & Body Wash (CS0285XXX) - MSDS ONLY** **514**
Simoniz USA Inc.
2/3/2000

01528 **Phosphoric Acid (0240)** **515**
Avantor Performance Materials, Inc.
10/14/2015

Spectrum Chemicals and Laboratory Products, Inc.
3/1/2017

03775 **Potassium Iodide Granular GR ACS (PX1507)** **530**
EMD Millipore Corporation
7/28/2017

01591 **Potassium Permanganate (3228)** **531**
Avantor Performance Materials, Inc.
9/4/2014

05149 **Power Sonic NiCd MSC0138** **532**
Power Sonic Europe
4/1/2017

02572 **Premium Plus ATF D/M (NOC1866)** **533**
Noco Energy Corp
5/14/2015

06526 **PrepRite Interior/Exterior Latex Block Filler White** **534**
The Sherwin-Williams Company
8/31/2019

06242 **PrepRite ProBlock Interior/Exterior Latex Primer/Sealer** **535**
The Sherwin-Williams Company
3/2/2018

06748 **Primary (non-rechargeable) Lithium Battery Nominal Voltage: 3.0 V** **536**
RENATA BATTERIES
2/24/2017

06235 **PRO + LSPR 6PK FLAT GRAY PRIMER** **537**
Rust-Oleum Corporation
5/19/2017

04583 **Pro Dope** **538**
Hercules Chemical Company Inc.
2/5/2015

06527 **PRO INDUSTRIAL Pre-Catalyzed Waterbased Epoxy Semi-Gloss Extra White** **539**
The Sherwin-Williams Company
10/3/2019

01637 **Pro LSPR 6PK Stripe Red Striping Paint (211777)** **540**
Rust-Oleum Corporation
5/18/2017

04263 **Pro-Link Diffuseaire Refills (All Fragrances) (PRO-009)** **541**
Pro-Link Inc.
7/1/2015

04247 **Pro-Poxy 2000 Normal-Part A (87-140387A)** **542**
Unitex
2/2/2016

04459 **Pro-Poxy 300 Fast-Part A** **543**
Unitex
1/22/2016

06638 **Professional Grade Solar Salt** **544**
The Kissner Group
3/6/2018

06048 **Propane Fuel, HD-5 (Oderized)** **545**
Targa Downstream, LLC
6/8/2015

03970 **Protectant, 1180** **546**
Armor All Products Corporation
1/31/2015

06720 **Protuff Amine** **547**
Tnemec Company, Inc
11/19/2019

06719 **Protuff White Base** **548**
Tnemec Company, Inc
10/23/2019

05583 **PTOUCH +SSPR 6PK Gloss Jade 12OZ IBU** **549**
Rust-Oleum Corporation
9/3/2015

05581 **PTOUCH +SSPR 6PK Gloss Purple 12OZ** **550**
Rust-Oleum Corporation
7/7/2016

05586 **PTOUCH +SSPR 6PK GLOSS REAL ORANGE** **551**
Rust-Oleum Corporation
10/10/2014

05133 **PTOUCH 2X + SSPR 66PK Gloss Berry Pink** **552**
Rust-Oleum Corporation
12/7/2016

05348 **PTOUCH 2X + SSPR 6PK Gloss Purple (249097)** **553**
Rust-Oleum Corporation
5/17/2017

01612 **Purafil Media** **554**
Purafil, Inc.
6/1/2015

05376	**Pure Lead** RSR North America Corp. 1/9/2019	**555**
05371	**Pure Lead - Philippines** RSR North America Corp. 1/9/2019	**556**
04879	**Purebright Ultra Germicidal Bleach** KIK Custom Products 3/6/2015	**557**
06684	**PVTLBL +SSPR 6PK TALON 0620417 CHERRY RD** Fastenal Company 8/27/2019	**558**
06716	**PVTLBL SSPR TALON Safety Yellow** Rust-Oleum Corporation 9/12/2018	**559**
06297	**QD Contact Cleaner** CRC Industries, Inc. 8/1/2017	**560**
06686	**QSOL™ 300 CLEANING SOLVENT** Safety-Kleen Systems, Inc. 11/8/2016	**561**
02584	**Quadrasperse CL4846** ChemTreat, Inc. 1/5/2015	**562**
04197	**Quick Clean Safety Solvent & Degreaser (03180)** CRC Industries, Inc. 10/25/2017	**563**
05182	**Quick Dam** Absorbent Specialty Products, LLC 1/30/2015	**564**
05020	**Quick Setting Cement (1240-00)** The Quikrete Companies 6/11/2015	**565**
01623	**Quikrete Portland Cement (1124)** The Quikrete Companies 5/4/2016	**566**
05492	**R134a Refigerant** Weitron, Inc. 10/9/2015	**567**

06658	**Rock River Multi-Purpose Construction** Fastenal Company 7/6/2015	**581**
05018	**Rock River Silicone Sealant-Clear, White & Colors** Fastenal Company 2/23/2015	**582**
05342	**Rock Salt, Halite, Salt** American Rock Salt Company LLC 8/30/2018	**583**
05585	**ROHPER LSPR 6PK FLUORESCENT GREEN** Russel Metals Inc. 8/13/2014	**584**
05814	**ROHPER LSPR 6PK GLOSS HUNTER GREEN** Rust-Oleum Corporation 7/28/2016	**585**
04637	**Rohper LSPR 6PK Gloss Industrial Yellow (V2147838)** Rust-Oleum Corporation 7/28/2016	**586**
05136	**ROHPER LSPR 6PK Gloss Safety Green** Rust-Oleum Corporation 11/21/2016	**587**
01659	**Ronex MP (2015A0206710)** Exxon Chemical Company 11/25/2014	**588**
04550	**RP Super Filter Coat #412** Research Products Corporation 11/1/1993	**589**
02095	**RTV Blue Gasket Maker Sensor-Safe Silicone (37526)** Henkel Corporation 8/28/2014	**590**
06159	**Rubber Solvent** Patch Rubber Company 1/15/2016	**591**
06045	**Rust Scat Alkyd Enamel Gross Tintable White** Benjamin Moore & Co. 4/29/2016	**592**
02980	**Rust Scat Polyurethane Enamel Semi-Gloss-White (13-1)** Benjamin Moore & Co. 10/30/2014	**593**

12/25/2014

06593 **Sawyer Permenthrin Insect Repellent(s): Clothing & Gear (50404-3-58188)** **607**
Sawyer Products, Inc
7/21/2014

05509 **SCIGRIP Solvent Cement for Acrylic** **608**
SCIGRIP Smarter Adhesive Solutions
12/23/2014

06746 **Secondary Smart Lithium-Ion Battery Packs** **609**
Inspired Energy, LLC
00/00/00

04221 **Selenium** **610**
Aaron Ferer & Sons Co.
4/9/2014

04019 **Selenium Standard (ICP-034)** **611**
Ultra Scientific
4/26/2016

06608 **Sharpie** **612**
Newell Rubbermaid, Inc. (Sanford LP.)
1/24/2012

06606 **Sharpie 2 Pack (3000)** **613**
Newell Rubbermaid, Inc. (Sanford LP.)
1/24/2012

01741 **Shell Tellus S2 M 32 (001D7743)** **614**
Shell Oil Products US
6/1/2016

06241 **SHER-ENDURE Aggregate** **615**
The Sherwin-Williams Company
9/9/2017

00935 **Shielded Metal ARC Welding (SMAW) Electrodes (Group A and Group B)** **616**
Hobart Brothers LLC
1/13/2016

05319 **SIE 1-GLK S60 Epoxy WB Gls Oyster White** **617**
Rust-Oleum Corporation
8/3/2015

05761 **SIE S40 1-GL 2PK Activator** **618**
Rust-Oleum Corporation
5/10/2016

06381 **SIE S40 1-GL EPOXY GLOSS C ASSIC GRAY** **619**

Rust-Oleum Corporation
8/13/2018

05760 **SIE S40 1-GL EPOXY SATIN CLEAR** **620**
Rust-Oleum Corporation
5/10/2016

06597 **SIE S70 1-GL EPOXY METAL PRIMER WHITE (208110)** **621**
Rust-Oleum Corporation
8/7/2018

06598 **SIE S70 AND S71 1GL-ACTIVATOR (208112)** **622**
Rust-Oleum Corporation
8/7/2018

03597 **Sigma S-460 Synthetic Air Compressor Fluid** **623**
Kaeser Compressors
12/31/2015

06067 **Sika Level-01 Primer Plus** **624**
Sika Corporation
3/2/2017

06399 **Sika Level-325** **625**
Sika Corporation
1/29/2018

06068 **Sika Level-525 Rapid** **626**
Sika Corporation
2/3/2017

06107 **Sikadur -32 Hi-Mod Part A** **627**
Sika Corporation
8/22/2017

06108 **Sikadur -32 Hi-Mod Part B** **628**
Sika Corporation
8/23/2017

06089 **Sikaflex -2c NS/SL Part B** **629**
Sika Corporation
6/9/2017

06088 **Sikaflex -2c SL Part A Tint Base** **630**
Sika Corporation
2/10/2017

06372 **Sikaflex + Concrete Fix** **631**
Sika Corporation
4/11/2016

01748 **Sikaflex 1A** **632**

Sika Corporation
7/29/2014

04636 **Sikaflex Primer 260/205** **633**
Sika Corporation
7/29/2014

06371 **Sikaflex-1cSL** **634**
Sika Corporation
9/18/2017

04617 **SikaRepair 223** **635**
Sika Corporation
2/12/2018

04463 **SikaTop III Plus Part B** **636**
Sika Corporation
2/28/2018

04462 **SikaTop Plus Part A** **637**
Sika Corporation
4/4/2017

01750 **Silica Gel (3414)** **638**
Avantor Performance Materials, Inc.
9/8/2014

06416 **Silica Refractories** **639**
Allied Mineral Products, Inc.
2/16/2022

05310 **Silicone Brake Fluid** **640**
AGS Company
11/17/2016

05101 **Silicone Rubber Sealant** **641**
Momentive American Industries
12/20/2012

06043 **Silpro TDQ (Thin Deep Quick Repair)** **642**
Silpro, LLC
5/31/2015

00200 **Silver Grade Anti-Seize Lubricant** **643**
Henkel Loctite Corporation
8/28/2014

04211 **Silver Nitrate** **644**
Alfa Aesar, a Johnson Matthey Company
1/9/2017

03770 **Silver Nitrate (101510)** **645**

00/00/00

03818 **Sodium Hydroxide Solution, 50%** **659**
Slack Chemical Company, Inc.
4/27/2015

01825 **Sodium Hypochlorite (EPA) (M7745)** **660**
Occidental Chemical Corporation
6/27/2014

05886 **Sodium Nitrate** **661**
SQM North America
1/1/2014

01837 **Sodium Peroxide For Synthesis (814606)** **662**
EMD Millipore Corporation
3/21/2018

04931 **Sodium Sulfate** **663**
Avantor Performance Materials, Inc.
5/21/2014

05380 **Sodium Sulfate** **664**
RSR North America Corp.
1/9/2019

02621 **Sodium Sulfate, Anhydrous** **665**
The Doe Run Company
10/1/2013

06429 **Sodium Sulfide Nonahydrate** **666**
Alfa Aesar, Thermo Fisher Scientific Chemicals, Inc.
3/26/2018

05379 **Sodium Sulfite-Sodium Carbonate Solution** **667**
RSR North America Corp.
1/9/2019

05383 **Soft Lead** **668**
RSR North America Corp.
1/9/2019

06358 **Soft Lead - Ag** **669**
RSR North America Corp.
1/9/2019

06644 **Soft Touch Fabric Softener (157100.1010)** **670**
California Prison Industry Authority
2/8/2017

05263 **Softener Resin** **671**
Culligan International Company

10/10/2013

01884 **SOS 307 Mod., SOS 308L, SOS 308L, SOS 309, SOS 309L...** **672**
Stoody Company
3/9/2017

04191 **SP-400 Corrosion Inhibitor (03282)** **673**
CRC Industries, Inc.
8/8/2018

06148 **Spa Body Shampoo** **674**
Spartan Chemical Company, Inc.
1/24/2018

06445 **SparkleTuff Anti-Slip Part A** **675**
Safety Direct America
8/15/2016

03826 **Spcuse 1-GL 2PK Thinner VOC Compliant (333402)** **676**
Rust-Oleum Corporation
8/14/2014

05587 **SPECLT SSPR 6PK FARM YELLOW** **677**
Rust-Oleum Corporation
5/15/2015

05543 **SPECLT SSPR 6PK FLOUR ORANGE** **678**
Rust-Oleum Corporation
5/15/2015

04979 **Speclt SSPR 6PK Mark Fluorescent Orange (1987830)** **679**
Rust-Oleum Corporation
5/15/2015

04488 **Speclt SSPR 6PK Metalc Gold 11 Oz (1910830)** **680**
Rust-Oleum Corporation
10/9/2015

06468 **Spectroblend 660, 675 and 690** **681**
Chemplex Industries, Inc.
9/12/2018

03808 **Spray Nine** **682**
ITW Permatex
4/22/2015

06461 **SS322 Part A (Colors)** **683**
National Polymers Inc.
4/15/2015

03831 **Stabil Fuel Stabilizer** **684**
Gold Eagle Company

9/17/2015

01905 **Stain Blaster Power Pak 3 (975383-03)** **685**
Ecolab Inc.
8/5/2015

01906 **Stainless Steel** **686**
North American Stainless
4/1/2015

06354 **Stainless Steel Wipes** **687**
Weiman Products
2/9/2015

03816 **Starch Indicator (H365)** **688**
Avantor Performance Materials, Inc.
10/28/2014

05818 **Starch Indicator, 1 Percent (W/V) Aqueous Solution, Stabilized (S-572)** **689**
Spectrum Chemicals and Laboratory Products, Inc.
7/14/2015

05922 **STARstrap-Eco-S/STARstrap-plus/STARstrap ULTRA/STARstrap ULTRA-H Polyester Strap** **690**
FROMM Chile S.A.
4/20/2017

05048 **Std Tutti Sol A** **691**
High Purity Standards
6/17/2014

05049 **Std Tutti Sol B** **692**
High Purity Standards
6/17/2014

05917 **Steam Activated Carbon** **693**
Oxbow Activated Carbon LLC
3/5/2016

03782 **Stearic Acid/Palmitic Acid (2236)** **694**
Avantor Performance Materials, Inc.
4/13/2016

05135 **STRUST + SSPR 6Pk Gloss Orange** **695**
Rust-Oleum Corporation
11/15/2016

05582 **STRUST +SSPR 6PK Gloss Burgundy** **696**
Rust-Oleum Corporation
5/25/2016

04689 **Strypeeze Biodegradable (260N) - MSDS ONLY** **697**

Natural Minerals
6/30/2017

05287 **Teal Blue S/G Minion Acrylic (PLX3152-24)** **711**
Diamond Vogel Paint
5/19/2015

06383 **Techspray E-Line IPA** **712**
Techspray
5/19/2015

06439 **Tectyl 506** **713**
Daubert Chemical Company, Inc.
7/31/2018

03484 **TFE Pipe Thread Sealer with PTFE** **714**
Anti-Seize Technology
12/11/2017

05274 **Thermaline 451 Part A** **715**
Carboline Company
5/29/2015

05275 **Thermaline 451 Part B** **716**
Carboline Company
5/29/2015

02025 **Thermolith** **717**
Harbison-Walker International
5/18/2015

05412 **Thermosteel Bulk Packed 24 oz. - MSDS ONLY** **718**
Technical Chemical Company
10/21/2014

02026 **Thinner 2 (0522S1NL)** **719**
Carboline Company
2/26/2019

01191 **Threadlocker 242 Medium Strength (37477)** **720**
Henkel Corporation
8/21/2014

05198 **Three Elephant Dense Soda Ash** **721**
Searles Valley Minerals
8/21/2018

04752 **Tin** **722**
Amalgamet, Inc.
5/1/2015

05381 **Tin Copper** **723**
RSR North America Corp.

1/9/2019

03798 **Tin Standard (ICP-050)** **724**
Ultra Scientific
4/12/2015

02042 **Tin Standard, 1000 PPM In Dilute Hydrochloric Acid** **725**
Ricca Chemical Company
9/7/2016

03783 **Titanium Dioxide (4162)** **726**
Avantor Performance Materials, Inc.
8/12/2014

02050 **Titanium Putty Resin, Hardener (10770)** **727**
ITW Performance Polymers
7/30/2015

02568 **Top Flight (150)** **728**
Betco Corporation
3/31/2017

05107 **Touch N Foam Pro System 15 REG Part-A (EHS2422)** **729**
Convenience Products, Division of Clayton Corp.
7/5/2016

05174 **Touch N Tone Aerosol Topcoats** **730**
Rust-Oleum Corporation
10/19/2015

06303 **Touch Up Spray Paint** **731**
MG Chemicals
1/9/2017

06061 **Tough Shield Floor & Patio Tint Base** **732**
INSL-X Products Corporation
12/5/2014

05892 **Tri-Star So Fresh - MSDS ONLY** **733**
Ecolab Inc.
10/18/2016

02577 **Tri-Star Turbo Boost (904839-01)** **734**
Ecolab Inc.
10/19/2018

06066 **Trigonox 239** **735**
Akzo Nobel Functional Chemicals LLC
4/26/2015

05664 **Trisodium Phosphate Cry** **736**
Brenntag Northeast, Inc.

2/10/2016

04964 **Trisodium Phosphate dodecahydrate** **737**
InterContinental Chemicals, LLC
2/10/2016

03696 **Trisodium Phosphate, Dodecahydrate - MSDS ONLY** **738**
Innophos
9/30/2010

03177 **TruLo Asphalt (23124-NAM)** **739**
Owens Corning Roofing & Asphalt, LLC
11/18/2015

05507 **Tub & Tile Cleaner** **740**
Seventh Generation
5/21/2015

04454 **Tufchem Epoxy Hardener** **741**
Corrosion Engineering Division of ErgonArmor
4/27/2015

04453 **Tufchem Epoxy Resin** **742**
Ergon Armor
4/22/2015

06040 **Tufchem Grout Filler** **743**
Ergon Armor - Corrosion Engineering
8/13/2015

04452 **Tufchem II Membrane-Part A** **744**
Ergon Armor
4/17/2015

06042 **Tufchem Injection Grout Filler** **745**
Ergon Armor
6/20/2014

04905 **Tufchem Silicate Solution** **746**
Corrosion Engineering Division of ErgonArmor
6/18/2015

03971 **Turtle Wax Zip Wax Ultra Car Wash & Wax (T-68(C))** **747**
Turtle Wax Inc.
3/6/2015

06283 **U-tek +30F / -1C Mat or Singles** **748**
Sonoco Protective Solutions
3/30/2016

06750 **Ucrete Part 1** **749**
BASF Corporation

5/21/2007

02579 **Ultra Black Gasket Maker 3.35OZ (82150)** **750**
ITW Permatex
1/6/2016

05016 **Ultra Spec 500 Interior Eggshell** **751**
Benjamin Moore & Co.
8/7/2018

05017 **Ultra Spec 500 Interior Semi-Gloss** **752**
Benjamin Moore & Co.
11/4/2016

05139 **Ultragel II** **753**
Magnaflux
3/4/2016

02097 **Unacast 14-85C3 - MSDS ONLY** **754**
HarbisonWalker International
6/4/2010

05685 **Unifi Polyester Filament Yarn and/or Staple Fiber** **755**
UniFi Manufacturing, Inc.
7/20/2016

06136 **Unirex N 3** **756**
Exxon Mobil Corporation - Spring, TX
5/20/2016

04517 **Unitex Hydraulic Cement (83-307979)** **757**
Unitex
5/27/2015

04586 **Unitex Multi-Purpose Grout (83-307975)** **758**
Unitex
3/17/2016

05990 **Universal Metal Primer Gray** **759**
Benjamin Moore & Co.
7/6/2018

04448 **Urethane Asphalt Hardener-Part B** **760**
Ergon Armor-Technical Coating Solutions
1/8/2015

02106 **Urethane Converter 900 (0848B1NL)** **761**
Carboline Company
3/18/2016

02599 **US Forge: E6011, E6013, E7014, E7018 Electrodes** **762**
US Forge

3/30/2017

02111 **Utility Mix Blacktop, Quikrete Blacktop, All Weather Blacktop** **763**
Package Pavement Co., Inc
4/1/2015

06160 **Uvex Clear Solution** **764**
Honeywell Safety Products USA, Inc
7/6/2015

02112 **Vacutainer Brand Tubes 6527** **765**
Becton Dickinson Vacutainer Systems
4/2/2015

05314 **Vacuum Pump Lubricant ISO 46-100 BVA VAC 46, BVA VAC 68, BVA VAC 100** **766**
BVA OILS
1/10/2013

06082 **VHT Engine Paint Aerosol Ford Red** **767**
VHT Products Co.
8/25/2017

06083 **VHT(R) Hi-Temp Engine Enamel 550°F (288°C) Chrysler Hemi-Orange** **768**
VHT Products Co.
8/25/2017

06084 **VHT(R) Hi-Temp Engine Enamel 550°F (288°C) Ford Light Blue** **769**
VHT Products Co.
11/7/2017

05021 **Vinyl Concrete Patcher (1133)** **770**
The Quikrete Companies
1/4/2016

02139 **Vitrified Abrasive Product (983468_BA_Vit)** **771**
Norton Company (Saint-Gobain Abrasives, Inc)
7/1/2013

05397 **Volclay 325** **772**
American Colloid Company
3/7/2014

06629 **Water Based Products (A11)** **773**
The Quikrete Companies
00/00/00

02150 **WD-40 Aerosol** **774**
WD-40 Company
7/20/2014

Rae Products & Chemicals Corporation
6/1/2015

05240 **ZEP HD Citrus Degreaser Z** **788**
Zep Inc.
5/5/2015

APPENDIX F

MATERIAL HANDLING PROCEDURES

HANDLING HAZARDOUS WASTE MATERIALS

&

HAZARDOUS MATERIALS

Is Incorporated by reference

Refer to

Ecobat's

Handling Hazardous Waste Materials & Hazardous Materials

Control Document # 043-SAF-PRG-007

APPENDIX G

PETROLEUM STORAGE TANK LOCATIONS,

AMOUNTS AND DESCRIPTION

TABLE 2

PETROLEUM STORAGE TANK LOCATIONS AND AMOUNTS

Tank Number	Tank Location	Shell Material	Capacity (gallons)	Contents
1	Diesel Fueling Area Tank 1	Carbon Steel	6,000	Diesel
2	Diesel Fueling Area Tank 2	Carbon Steel	6,000	Diesel
3	Maintenance Department (3)	Carbon Steel	300	Hydraulic Fluid
4	Maintenance Department (4)	Carbon Steel	250	Tractor Transmission Fluid
5	Maintenance Department (5)	Carbon Steel	300	Motor Oil
7	Back-up Diesel Fuel Tank	Carbon Steel	1625	Diesel
9	Crystallizer Back-Up Generator Tank	Carbon Steel	900	Diesel
10	Maintenance Department (10)	Carbon Steel	275	Used Oil
11	Diesel Stormwater Pump	Carbon Steel	110	Diesel
NA*	Generator 1 and 2 Day Tanks	Carbon Steel	Two at 275 each	Diesel
NA*	Mobile Fueling Cart	Carbon Steel	100	Diesel
NA*	Crystallizer Lubricating Fluid Storage	Drums and other Miscellaneous	Containers (up to 440 gallons)	Miscellaneous
NA*	Effluent Treatment Plan Lubricating Fluid Storage	Drums and other Miscellaneous	Containers (up to 440 gallons)	Miscellaneous
NA*	Lubricating Fluid Storage in Warehouse (and Trailer Parking Area Building)	Totes and Carbon Steel	Drums (up to 220 gallons) and Totes (up to 600 gallons)	Motor, Hydraulic and Lube Oil
NA*	Trailer Parking Area Containments	Carbon Steel and Plastic	Drums (up to 220 gallons) and 5-gallon plastic Totes (up to 60 gallons)	Motor Oil, Grease, Hydraulic, Lube Oil

TABLE 2 (continued)

PETROLEUM STORAGE TANK LOCATIONS AND AMOUNTS

Tank Number	Tank Location	Shell Material	Capacity (gallons)	Contents
NA*	Lubricating Fluid Storage in Motor Pool	Carbon Steel	Drums (up to 1,500 gallons)	Motor, Hydraulic and Lube Oil
NA*	Hydraulic Oil Storage in East Compressor Shed	Carbon Steel	Drums (up to 250 gallons)	Hydraulic Oil
NA**	Hydraulic Oil Storage in East Compressor Shed	Concrete	Reservoir (792 gallon)	Hydraulic Oil
NA*	Lubricating Fluid Storage in Compressor Room	Carbon Steel	Drums (up to 250 gallons)	Lube Oil
NA**	Cardboard and Stretch Wrap Baler	Carbon Steel	100 gallon	Hydraulic Oil
NA**	7 Transformers (one for each WESP Cell)	Base-mounted Transformers	700 gallons (total)	Mineral Oil
NA**	WESP Main MCC Transformer	Pad-mounted Transformer	464	Envirotemp FR-3
NA**	East side of railroad tracks (Spare)	Pad-mounted Transformer	474	Envirotemp FR-3
NA**	East side of railroad tracks (TX-3, TX-4 and Spare)	Pad-mounted Transformers	1167	Mineral Oil
NA**	Crystallizer (TX-6)	Pad-mounted Transformer	585	Mineral Oil
NA**	Oxygen Plant (TX-2)	Pad-mounted Transformer	540	Mineral Oil
NA**	Northeast side of site (OTR Lot) – Not In Use	Pole-mounted Transformers	Unknown (<200)	Mineral Oil
NA**	Between Main MCC Room and Generators (TX-1)	Pad-mounted Transformer	645	Mineral Oil
NA**	Adjacent to Battery Wrecker MCC Room (TX-5)	Pad-mounted Transformers	570	Mineral Oil
NA*	Linde Oxygen Plant	Carbon Steel	<55	Motor Oil

* - Registration not required because containers have a maximum capacity of 5-55 gallons and/or are non-stationary (i.e., Drums, Totes, etc…) or are part of equipment in process.
** - NYSDEC has decided to exercise enforcement discretion at this time to not subject tanks storing product for operational purposes (e.g., transformers, hydraulic machines, etc.) to registration and the requirements of 6 NYCRR Parts 613 until such time as the regulations are revised.
*** - Tank 8 removed from service (2009 amendment)

*** - Tank 6 removed from service (2012 amendment)

Miscellaneous lubricating fluids are stored at numerous locations throughout the facility. For detailed information on these items and areas refer to the Ecobat SPCC Plan.

Petroleum Tanks

Diesel Fueling Area (Tank Numbers 1 and 2)

There are two 6,000-gallon diesel fuel tanks in the diesel fuel area, which is on the western portion of the site. The tanks are equipped with overfill alarms and are within a secondary containment system consisting of an above grade concrete wall and floor structure. The approximate dimensions of the containment volume (46x30.5x3.5 feet) provide a total storage capacity of approximately 30,600gallons with a 6-inch freeboard, which is greater than 110 percent of the capacity of the tanks. The pipelines used to transport diesel fuel to the tank and from the tank to the fuel pump are aboveground and within the secondary containment system. The floor surface within the diked area has been sloped toward the front (approximately a one-inch drop per 10 feet) so that storm water in the containment area will flow toward the north to the drain. The drain is normally kept closed. Storm water containing a sheen will be removed from the containment system and disposed of according to applicable State and Federal regulations.

Standing storm water with no visible sheen within the containment structure is sent to the storm water sump located within the protective berm surrounding this part of the plant. Ecobat does not have an oil/water separator within the diesel fueling area secondary containment system. Should a minor spill occur in the secondary containment system or on the concrete operational area, it will be contained with sorbent material and drummed for disposal. If a major spill occurs in the secondary containment system, the material would be held in the containment system and removed by an oil recycler or disposal contractor. Should a major spill or release occur on the concrete operational area of the facility, it would enter the storm water collection system and would be held and removed by an oil recycler or disposal contractor.

The off-loading system is located within the secondary containment system. The coupling to the tanker is located within the system so that if an accidental spill or release should occur during material transfer, the material would be retained in the diked containment structure.

The equipment fueling pump is within the containment system, but some negligible losses could occur from the overfilling of equipment or material running down the hose to the outside of the containment system. An overhead fuel line hose retractor was installed to allow easier mobility of the hose and reduce breakage of the breakaway valves on the fill handles. Any spill or release that would occur outside of the containment structure would be captured by the on-site drainage control system and would flow to the stormwater sump. Tank truck loading and unloading procedures are discussed in section 4.0.

Maintenance Department (Tank Numbers 3, 4, 5 and 10)

The maintenance department has four aboveground tanks. A 300-gallon tank contains hydraulic fluids, a 300-gallon tank contains motor oil, a 250-gallon tank contains tractor transmission fluid, and a 275-gallon tank contains used motor oil. These tanks are near the northern corner of the Middletown facility. The tanks are within a secondary containment system consisting of a 0.24-inch steel plate wall and floor structure. The approximate dimensions of the containment volume (14x8x1 feet) provide a total storage capacity of

approximately 838 gallons with a six inch freeboard, which is greater than 110 percent of the capacity of any of the four tanks. Ecobat personnel load the tanks from standing 55-gallon drums. Drip pans and sorbent material are used to collect any small spills or releases. Should a tank fail, the material would be retained within the containment system and removed by an oil recycler or disposal contractor.

Back-Up Diesel Fuel Tank (Tank Number 7)

The 1,625-gallon tank is on the western side of the site, next to the electric power generators and MCC Room. The aboveground tank is equipped with an overfill alarm and a secondary containment system consisting of a steel wall and floor structure. The approximate dimensions of the containment volume (15x7x4 feet) provide a total storage capacity of approximately 2,750gallons with a 6-inch freeboard, which is greater than 110 percent of the capacity of the 1,625-gallon storage tank located within the containment structure. The pipelines used to transport diesel fuel from the tank to the backup generators are aboveground. The system has one drain with a standpipe configuration on the outside. The standpipe is in an upright position to prevent the discharge of contained water to the ground surface. Stormwater containing a sheen will be removed from the containment system and disposed of according to applicable State and Federal regulations.

Diesel Tank 7 fills two generator day tanks which are equipped with a leak detection system and overfill alarm which initiates a reverse pump that recirculates the diesel back to the main fuel tank (Tank 7). Each day tank has a capacity of 275 gallons and is maintained at 75% of capacity.

Standing storm water, with no visible sheen, within the diked area is drained to the drainage controlled concrete operational area of the facility. The water then flows to the storm water sump that is located within the protective berm surrounding this part of the plant. Ecobat does not have an oil/water separator within this diesel fuel tank secondary containment system. Should a minor spill occur in the secondary containment system or on the operational area, it will be contained with sorbent material and drummed for disposal. If a major spill or release occurs in the secondary containment system, the material would be held in the containment system and removed by an oil recycler or disposal contractor. Should a major spill or release occur on the concrete operational area of the facility, it would enter the storm water collection system and would be held and removed by an oil recycler or a disposal contractor.

The off-loading system is currently located so that the coupling to the mobile fueling tanker is at the top of the tank. Should and accidental spill or release occur during material transfer, the material would be retained in the secondary containment system.

Crystallizer Back-Up Generator Tank (Tank Number 9)

The crystallizer back-up generator tank is on the northeastern portion of the property. The on-site sodium sulfate crystallization building has a diesel generator with an attached 900-gallon fuel tank. This storage tank provides diesel fuel as part of the emergency back-up system for the crystallizer building. The 900-gallon tank is a double-walled tank, which can contain the entire contents of the primary tank in the secondary tank containment if the tank fails.

The fill pipe and coupling are on the top of the double-walled storage tank that is equipped with a “basin alarm” for leak detection. Should a spill occur, the product would collect on the concrete area near the generator, where it would be controlled with sorbent material and drummed for disposal. This tank is not

fully bermed which allows for the potential of loss of oil to soil located approximately 15 feet to the north-northeast of the tank.

Diesel (Stormwater) Back-Up Pump Fuel Tank (Tank Number 11)

The diesel (storm water) back-up pump fuel tank is located on the southeastern portion of the Facility. The storm water back-up pump is a portable pump that has been hard-piped in-line causing it to be stationary and therefore a registered PBS tank. The fuel tank for this pump has a 110-gallon fuel tank (110-gallon maximum capacity and 95-gallon working capacity). The storage tank provides diesel fuel as part of the emergency back-up system for the main (electric) storm water sump pump. The portable pump is located adjacent to the main storm water shed and is located on a concrete pad that is bermed, which will contain the contents of the fuel tank if the tank fails. The fuel tank has a fill gauge. Should a spill occur, the product would collect on the concrete area near the generator, where it would be controlled with sorbent material and drummed for disposal.

Crystallizer Lubricating Fluid Storage

Several containers of various sizes are located on the eastern wall of the crystallizer near the sodium sulfate storage silos. The containers are stored on covered plastic secondary containment pallets that are designed to retain spills or releases from the containers. Any spill not captured by the secondary containment pallet will be controlled with sorbent material and drummed for disposal.

Effluent Treatment Plant Lubricating Fluid Storage

Several containers of various sizes are located along the eastern wall of the effluent treatment plant near the ferric sulfate tank. The containers are stored on covered plastic secondary containment pallets that are designed to retain spills or releases from the containers. Any spill not captured by the secondary containment pallet will be controlled with sorbent material and drummed for disposal. The effluent treatment plant is designed with secondary containment that would contain any spilled material.

Lubricating Fluid Storage inside the Warehouse (and trailer parking building)

Several Drums of oil products are stored on the south side of the warehouse next to the bay door. The approximate dimension of the containment area is 4x8 feet. The containers are stored on secondary containment pallets that are designed to retain spills or releases from the containers. Any spill not captured by the secondary containment pallets will be controlled with sorbent material and drummed for disposal.
In addition, one to two (300 gallon) totes of hydraulic oil are occasionally stored in the trailer parking area building. This building has three walls and is designed to contain spills. The structure slopes to the southeast where a sump collects liquids. This are is a temporary storage area.

Trailer Parking Area

Several Drums of petroleum products are stored on the south side of the trailer parking area adjacent to the east compressor shed. The approximate dimension of each of the two covered containment areas is 4x4 feet. The containers are stored on covered secondary containment pallets that are designed to retain spills or releases from the containers. Any spill not captured by the secondary containment pallets will be controlled with sorbent material and drummed for disposal.

Lubricating Fluid Storage in Motor Pool

Numerous drums of various sizes are stored near the northern motor pool area of the bay door. The drum storage area is equipped with a secondary containment system consisting of a 0.24-inch steel plate wall and floor structure. The approximate dimensions of the containment volume (10x5x0.5 Feet) provide a total storage capacity of approximately 187 gallons with a 3-inch freeboard, which is greater than 110 percent of the capacity of any one drum stored in the area. Small spills or releases that occur during material handling are collected with drip pans and sorbent material. Product drums are stored on their sides in drum racks. Should a drum fail, the material would be retained within the containment system and removed by an oil recycler or disposal contractor. Other containers of various sizes are stored on the concrete floor of the motor pool area. These containers are stored on spill pallets. Spills or releases would be contained within the spill pallets and/or controlled by sorbent material and drummed for disposal. Approximately 1,500 gallons of greases, oils and lubricants are stored in this area.

Pad-Mounted Transformers

Eight pad-mounted transformers, which contain mineral oil or Envirotemp FR-3, are on site; six are in-service and two are spares. The transformers are on concrete pads at several areas throughout the site. The ground surface near the concrete pads is soil. Should a release ever occur, the mineral oil would be released to the concrete pad and employees would control the spill with sorbent material and it would be drummed for disposal. If a mineral oil release reaches the ground, the impacted soil would be remediated.

In addition, the WESP has seven base mounted transformers that are adjacent to each Cell of the WESP, which contain mineral oil. There is also one main WESP MCC transformer that contains Envirotemp FR-3 fluid. All the WESP transformers are within buildings and would be released to concrete surfaces that are contained. Employees would control the spill with sorbent material and it would be drummed for disposal.

This SPCC Plan assumes that a spill from a transformer will not reach navigable waters prior to discovery and countermeasures, as a spill of mineral oil from a transformer would result in power loss and immediate action.

Hydraulic and Lubricating Oil in the East Compressor Shed and MCC Compressor Room

Several drums of hydraulic oil and a hydraulic oil reservoir are located along the southern wall of the East Compressor Shed (SRF compressor shed). In addition, several drums of oil are stored in the main compressor room. The containers are stored on plastic secondary containment pallets that are designed to retain spills or releases from the containers. The two plant air compressors have oil reservoirs (<55 gallons each) that contain oil. Any spill not captured by the secondary containment pallet will be controlled with sorbent material and drummed for disposal.

Hydraulic Oil in Cardboard and Stretch Wrap Baler

The cardboard and stretch wrap baler has a hydraulic reservoir that is 100 gallons maximum capacity (working capacity is 70 gallons) and is a process tank. The tank was installed as part of the Baler in December 2017. The tank is painted for external protection and completely guarded by stainless steel that is bolted to the baler (for protection from equipment and acid splashing from Battery Wrecker operation). The above ground tank is located in a containment building with triple monitorable leak detection. The reservoir has a product level gauge and high-level alarm. In addition, there is a low-level alarm on the reservoir. This tank is a process tank and therefore was not registered as a PBS Tank; this was verified per discussions with NYSDEC in December 2017.

Mobile Re-Fueling Cart

A mobile re-fueling cart is used to fuel mobile equipment. The cart holds approximately 100 gallons of diesel fuel. The cart is periodically inspected and maintained by motor-pool personnel and is used within the Site's secondary containment system.

Information regarding oil storage locations and quantities is subject to change. Reference Ecobat's Spill Prevention Control and Countermeasures Plan (SPCC) for the most up to date information.

APPENDIX H

Examples of Certified Letters Sent to Local Authorities

65 Ballard Road
Middletown NY 10941

Date

Office of the Chief
Silver Lake Fire District
26 Maltese Drive
Middletown, NY 10940

FedEx #:

Re: Emergency Preparedness/Contingency Plan for Ecobat Resources New York, LLC

To Whom It May Concern:

Enclosed is an updated revision of the Emergency Preparedness/Contingency Plan for Ecobat Resources New York (formerly Revere Smelting & Refining Corporation), a secondary lead smelting facility located on Ballard Road in the Town of Wallkill, Orange County, New York. The updates include a revision to the emergency notification list, updated chemical inventory and revised site plan. This plan is provided to familiarize you with the layout of the facility and the properties of the hazardous materials handled there should you need to respond to an emergency situation. In addition, Ecobat has prepared a quick reference guide that is attached as an addendum to the plan.

Please replace your existing plan with the enclosed copy and properly dispose of the previously issued copy of the Revere Smelting & Refining Emergency Preparedness Plan.

If you have any questions, please feel free to contact me.

Sincerely,

Mark D. Hoffman
Environmental Health & Safety Compliance Sr. Manager
Ecobat Resources New York, LLC
65 Ballard Road
Middletown, NY 10941
845-673-2225

cc: Thomas Mann, V.P. New York Operations

65 Ballard Road
Middletown NY 10941

Date

Town of Wallkill
Director of Emergency Management
99 Tower Drive
Middletown, NY 10941

FedEx #:

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845-673-2225

cc: Thomas Mann, V.P. New York Operations

65 Ballard Road
Middletown NY 10941

Date

Chief Robert Hertman
Town of Wallkill Police Department
99 Tower Drive
Middletown, NY 10941

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65 Ballard Road
Middletown, NY 10941
845-673-2225

cc: Thomas Mann, V.P. New York Operations

65 Ballard Road
Middletown NY 10941

Date

Sergeant Christian McCarthy FedEx #:
New York State Police, Troop F HQ
55 Crystal Run Road
Middletown, NY 10941

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Ecobat Resources New York, LLC
65 Ballard Road
Middletown, NY 10941
845-673-2225

cc: Thomas Mann, V.P. New York Operations

65 Ballard Road
Middletown NY 10941

Date

Chairperson
Local Emergency Planning Committee
22 Wells Farm Road
Goshen, NY 10924

FedEx #:

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65 Ballard Road
Middletown, NY 10941
845-673-2225

cc: Thomas Mann, V.P. New York Operations

65 Ballard Road
Middletown NY 10941

Date

Director of Emergency Services
Garnet Health Medical Center
707 East Main Street
Middletown, NY 10940

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Ecobat Resources New York, LLC
65 Ballard Road
Middletown, NY 10941
845-673-2225

cc: Thomas Mann, V.P. New York Operations

APPENDIX I

AUTHORITY TO COMMIT RESOURCES

Memorandum

To: Alternate Emergency Coordinators as noted on the Emergency Notification List

From: Thomas Mann

Date: August 2023

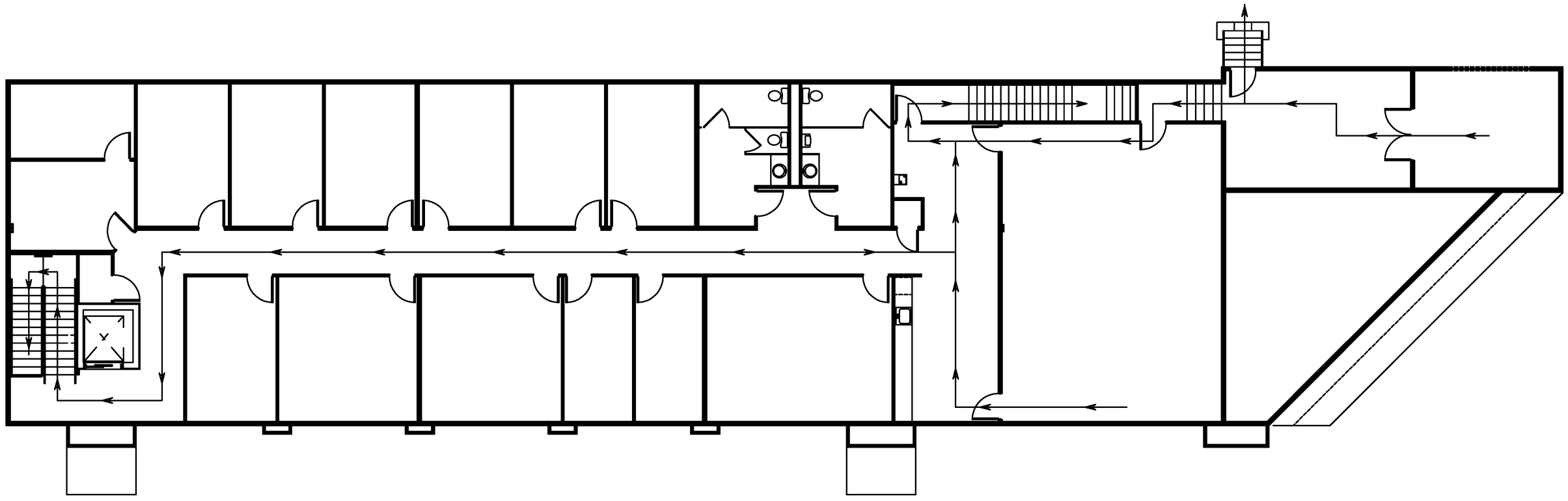
Re: Contingency Actions

This memo will serve as your written authority as an Alternate Emergency Coordinator (as appropriate) at Ecobat Resources New York, LLC, Middletown, New York site, to commit the resources of the Company needed to carry out the provisions of the facility contingency plans. This authority also includes the responsibility to account for such resources and the ability to delegate authority, in writing or otherwise subject to such limits as you deem available.

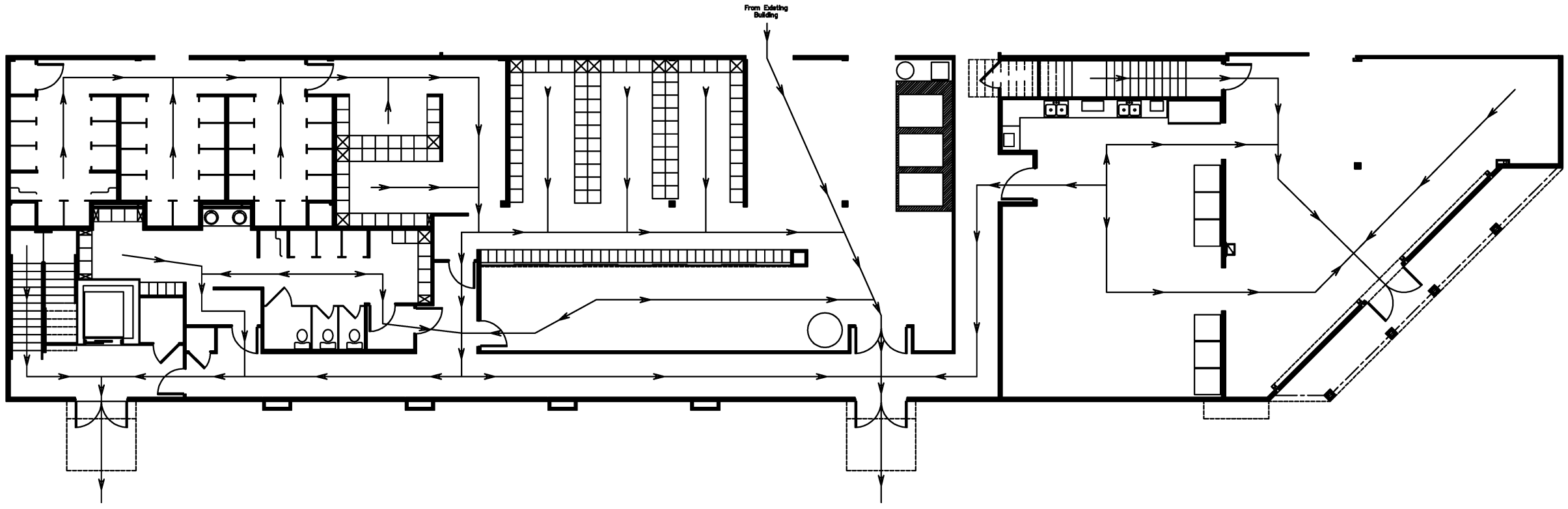
Thomas Mann
V.P. New York Operations

APPENDIX J

EVACUATION ROUTES

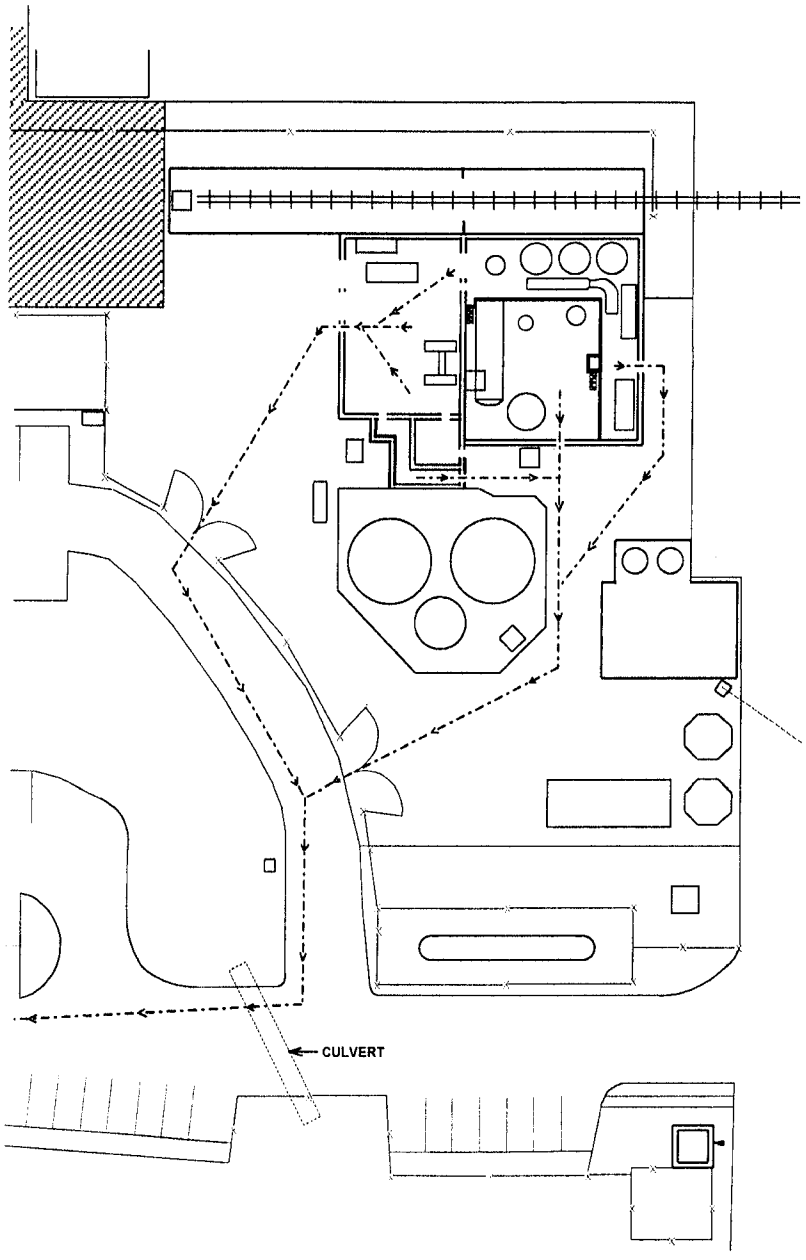


SECOND FLOOR PLAN

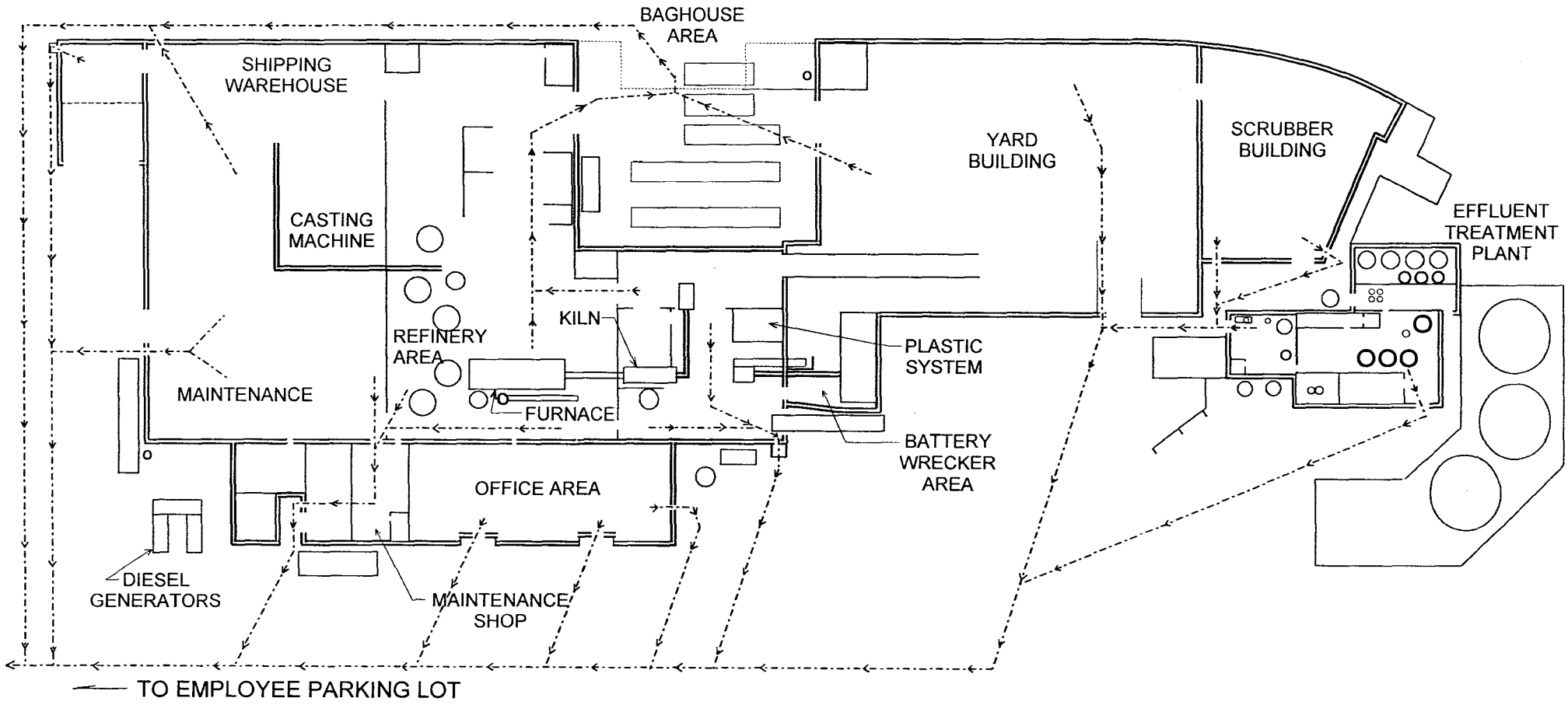


FIRST FLOOR PLAN

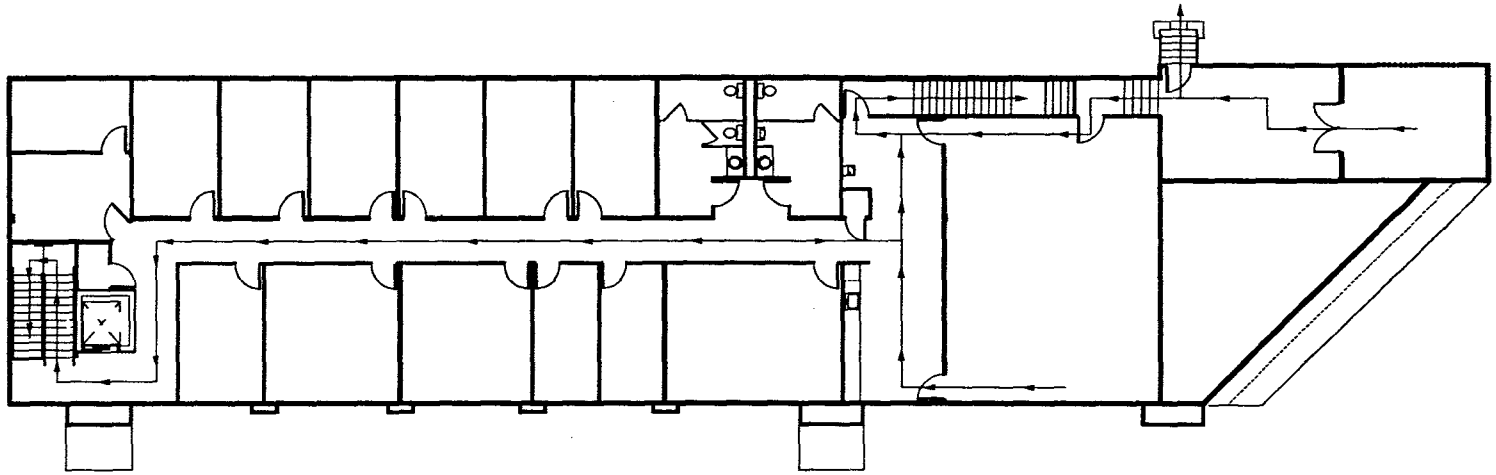
CRYSTALLIZER BUILDING
EVACUATION ROUTES



EVACUATION ROUTES FOR MAIN BUILDING AND WATER TREATMENT OPERATION



NOTE: ALL EVACUEE'S MEET IN REAR OF EMPLOYEE PARKING LOT



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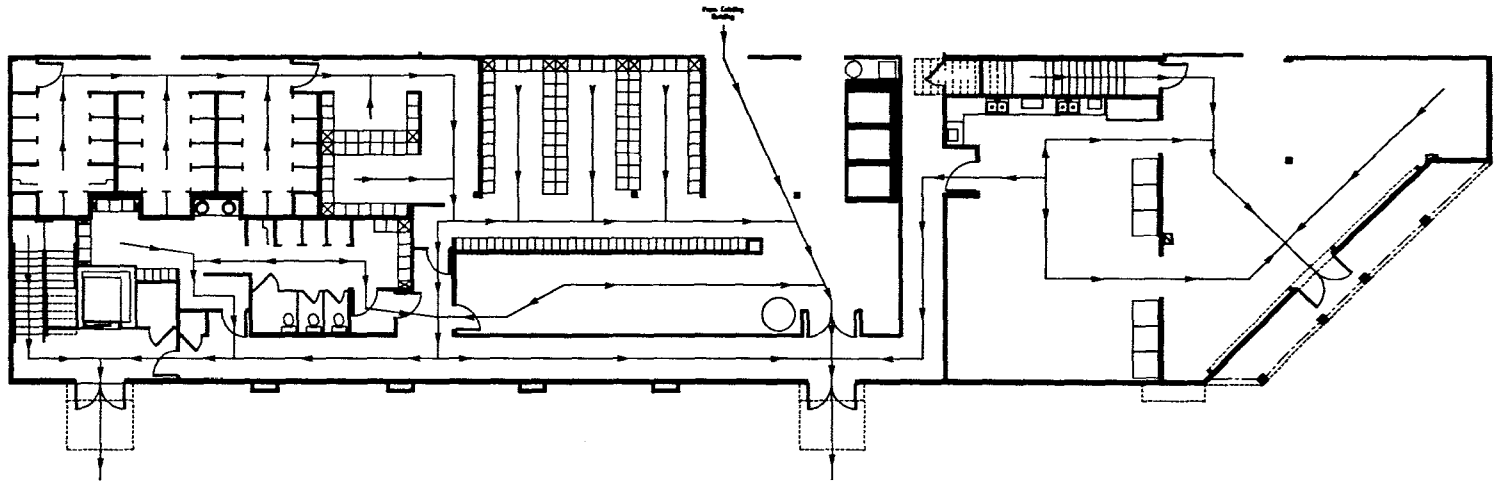
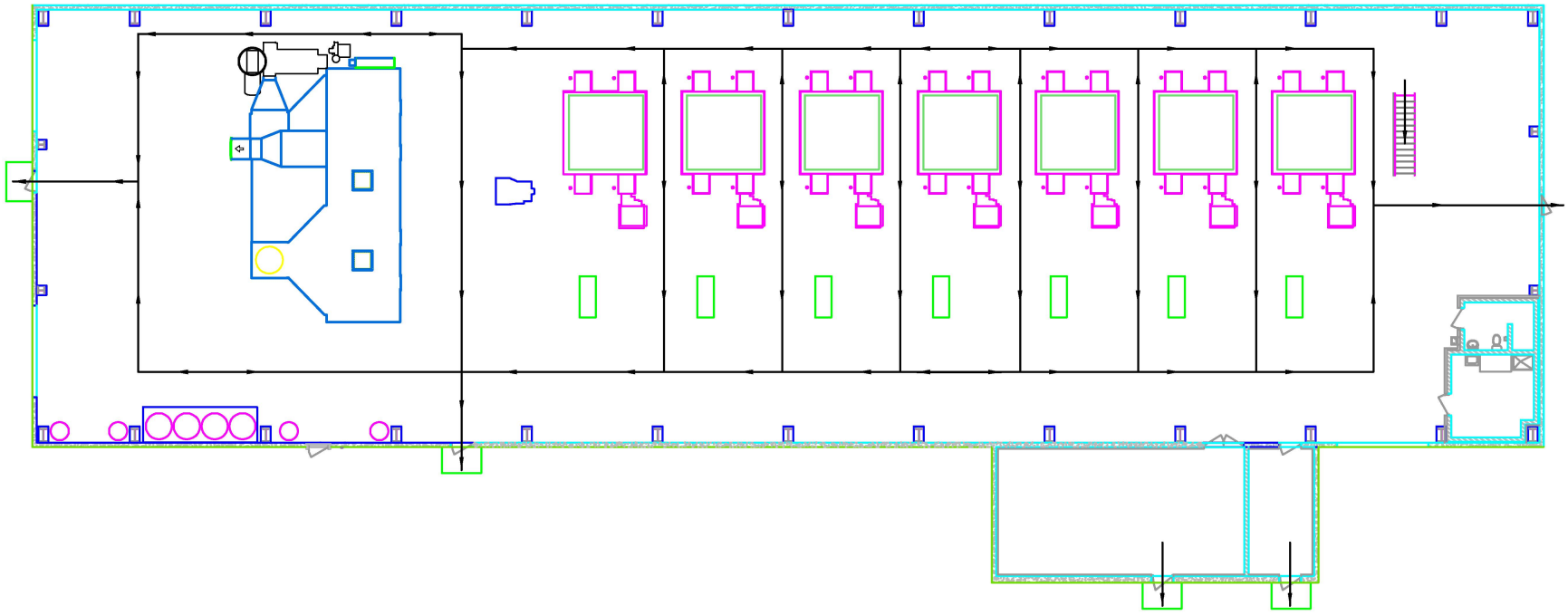


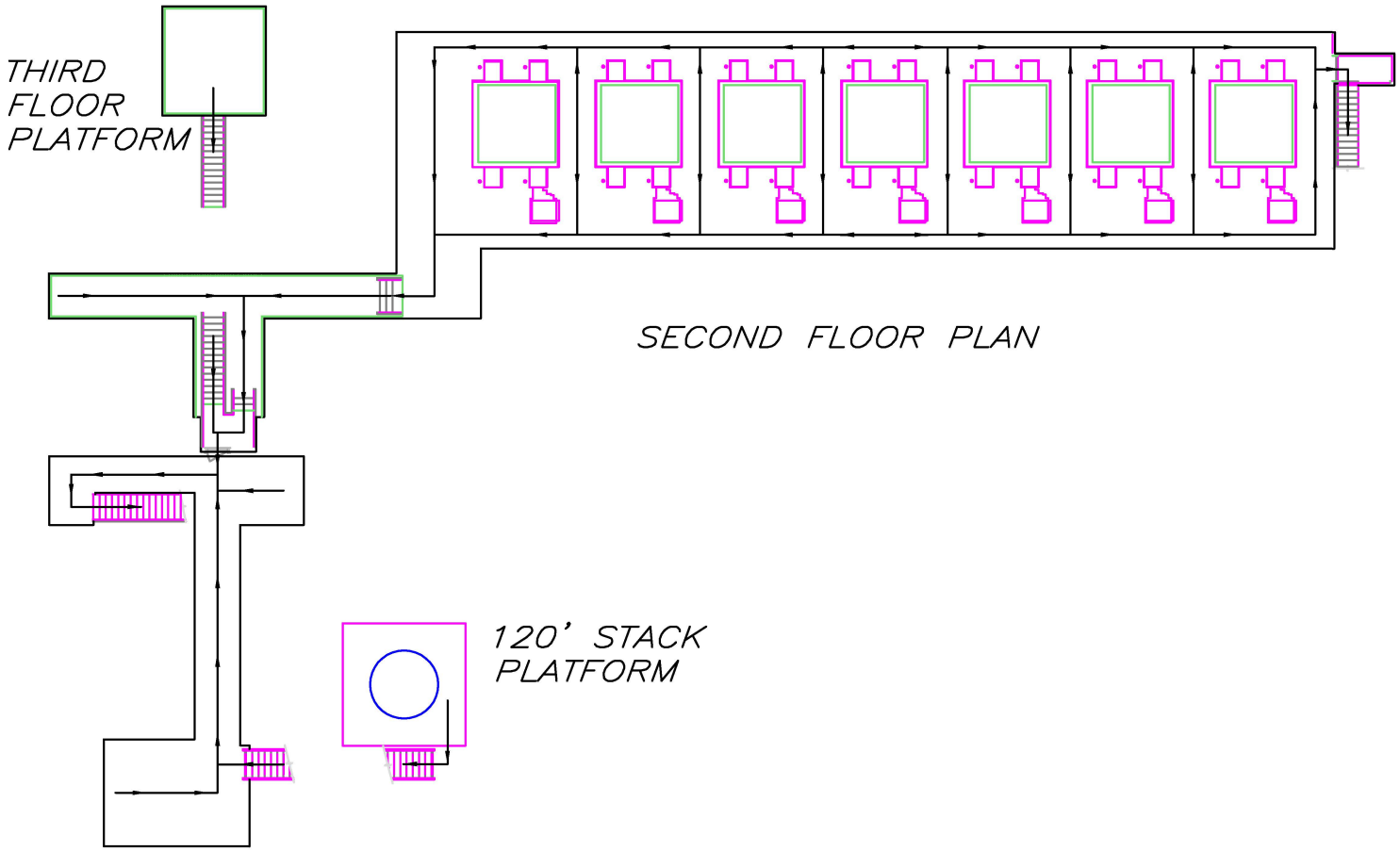
FIRST FLOOR PLAN

WESP BUILDING
EVACUATION ROUTES



FIRST FLOOR PLAN

WESP BUILDING
EVACUATION ROUTES



APPENDIX K

PLOT PLAN

EQUIPMENT LEGEND

1	KETTLE	29	PLASTIC DRYING SYSTEM
2	BW BALER	30	PLASTICS TRAILER PAN
3	FURNACE	31	SONIC SPRAY FEED TANK
4	BAGHOUSE	32	BAGHOUSE BLOWER
5	ROTARY DRYER	33	BATTERY CHARGING AREA
6	BATTERY WRECKER	34	MAIN GAS SHUT-OFF
7	MOTOR POOL	35	BOILER
8	STORAGE BINS	36	COMPRESSORS
9	OFFICE	37	HEAT EXCHANGER
10	LAB	38	CRYSTALLIZER VESSEL
11	SHOWER & EYE WASH STA.	39	SPRAY DRYER
12	EYE WASH ONLY	40	CHILLER
13	PLASTIC SYSTEM	41	C.E.M.
14	MOTOR CONTROL CENTER	42	SCRUBBER VESSEL
15	CASTING MACHINE	43	EMERGENCY BURN BLANKET
16	STACK	44	COKE HOPPER
17	DOCK	45	BW ACID SCRB SYS
18	NOT USED	46	MAYFRAN CONVEYOR
19	WASH STATION	47	WESP CELL
20	GANTRY CRANE	48	RTO
21	BOOT WASH/VACUUM STA.	49	PIG CAST. STACKER ROBOT
22	PROPANE VAPORIZER	50	ACID CLARIFIER
23	MAINTENANCE		
24	WELDING SHOP		
25	FILTER PRESS		
26	MAIN ELECTRIC SHUT-OFF		
27	COOLING TOWERS		
28	DILUTE SULFURIC ACID		

ENVIRONMENTAL LEGEND

EMISSION POINT REFERENCE

CHEMICAL LEGEND

ACL	ACETYLENE	LP	LIQUID PROPANE
ACT	ACETONE	LR	MISC. LAB REAGENTS
AL	ALUMINUM	MA	METALLIC ANTIMONY
BOR	BORAX	MAS	METALLIC ARSENIC
BR	BROMINE	MGS	MISCELLANEOUS GAS
CA	CALCIUM	MO	MISCELLANEOUS OIL
CAL	CALCIUM ALUMINUM ALLOY	MOR	MORTARS
CAM	METALLIC CALCIUM	MS	METALLIC SODIUM
CIB	CAST IRON BORINGS	NL	LIQUID NITROGEN
CK	COKE	NHS	NON-HAZARDOUS SLAG
COS	COBALT SULFATE	OXL	LIQUID OXYGEN
CS	CAUSTIC SODA	OXC	COMPRESSED OXYGEN
CSL	LIQUID CAUSTIC SODA	PET	OIL, GREASE OR KEROSENE
CU	COPPER	RP	RED PHOSPHORUS
D	DIESEL FUEL	REF	REFRACTORY MATERIALS
DEF	DIESEL EXHAUST FLUID	RVS	REVERB SLAG
DLM	DOLOMITIC LIME	S	SULFUR
DSL	DOSSLITE	SCL	SODIUM CHLORIDE
FC	FIRE CLAY	SA	SODA ASH (POWDERED)
FS	FERRIC SULFATE	SEL	SELENIUM
HCL	HYDROCHLORIC ACID	SRS	SRF SLAG
HYP	HYDROGEN PEROXIDE	SN	SODIUM NITRATE
HZS	HAZARDOUS SLAG	SS	SODIUM SULFATE
IPY	IRON PYRITE	SUA	SULFURIC ACID
KOH	CAUSTIC POTASH	TAR	ROOFING TAR
LI	LITHIUM	TIN	TIN
LM	PEBBLE LIME	TSP	TRISODIUM PHOSPHATE

FIRE & SAFETY LEGEND

ABOVE GROUND TANK	FENCE/BARRIER	ACID	ACID STORAGE
AIR CONDITIONING CONTROLS	GUARD STATION	CRY	CRYOGENIC
CARBON MONOXIDE DETECTOR	GAS SHUT-OFF	E/S	EVACUATION/STAGING AREAS
ELECTRICAL PANEL (SEE ALSO 14)	MANHOLE - SANITARY SEWER	FLA	FLAMMABLE
EMERGENCY LIGHT	OVERHEAD WIRE	GAS	GAS
FAP — FIRE ALARM PANEL	RAILROAD TRACK	LIQ	LIQUID
F — FIRE ALARM PULL STATION	SIGN	OXI	OXIDIZER
FIRE HYDRANT	SD — SMOKE DETECTOR	PYR	PYROPHORIC
FIRE EXTINGUISHER-DRY CHEMICAL	WATER SHUT-OFF	SLD	SOLID
FIRE EXTINGUISHER-CO2	M — MONITORING WELL	TR	TRANSFORMER
FIRE EXTINGUISHER-CLASS D	CLEAN UP KIT	W	WATER REACTIVE
	E — EXTRACTION WELL		

REVISIONS

8/4/23	ADDED: DEF, COMPACTOR, DUST, SILO UPGRADE, MOBILE EQ	CD
7/26/2023	MOVED SODIUM TRAILER LOCATION	CD
2/18/2022	ADDED PELLETIZER BUILDING	CC
1/15/2021	UPDATED CHEMICAL LOCATIONS	CC
5/18/2020	ADD MOBILE EQUIP, WOOD AND SPARE PARTS STORAGE	LDM
2/27/2020	ADD ACID SCRB, GANTRY CRANE, REM TSP FP	CC
FOR OLDER REVISIONS, SEE DWG FIRESAFETY_PLAN REV 2016-02-09		

JOB NO. / FILE NO. 97003.47 — SCALE: 1" = 40' — DATE: FEBRUARY 23, 2012

TITLE: SITE PLAN

PROJECT: SITE PLAN
ECO BAT NEW YORK, LLC
65 BALLARD ROAD, MIDDLETOWN, NY 10941
WALLKILL (T), ORANGE COUNTY, NY. SECTION 41, BLOCK 1
LOTS 70.21, 70.22, 70.23, 71.22, 73.1, 73.22

T. M. DEPUY
ENGINEERING & LAND SURVEYING, P.C.
2565 ROUTE 302, MIDDLETOWN, NEW YORK 10941
PHONE: (845) 361-5421 FAX: (845) 361-5229

DWG. FS1
SHEET 1 OF 1

65 Ballard Road
Middletown NY 10941

APPENDIX L

Ecobat

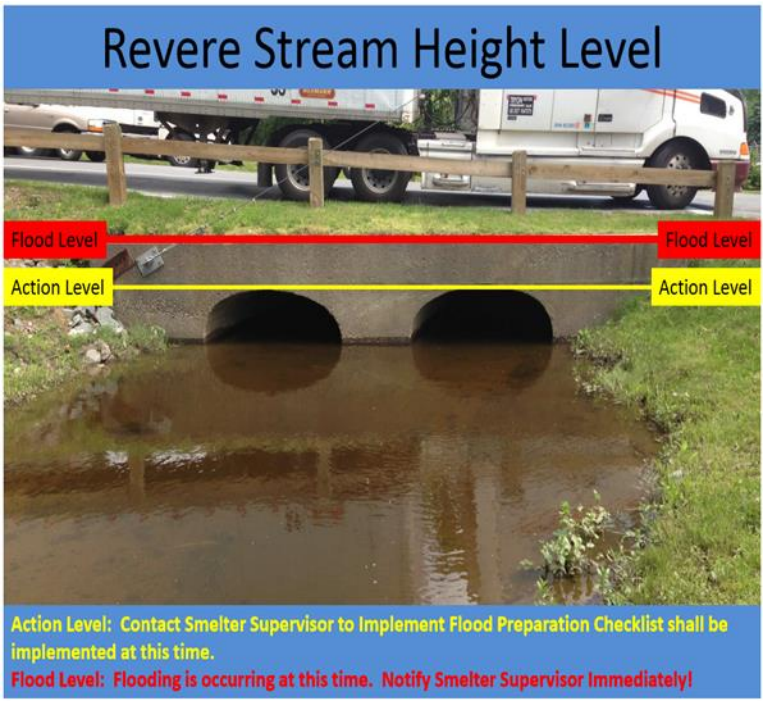
Emergency Procedures

Flood Preparation

65 Ballard Road
Middletown NY 10941

FLOOD PREPARATION

The following plan has been established to systematically protect our people and facility from flood hazards due to direct precipitation and stormwater impacts to the unnamed perennial drainage (aka Philipsburg Creek) immediately west of the fence line and guard shack. It outlines steps to be taken by responsible departments in the days leading up to a storm, through, and after, a major rain event.



Stages of preparedness include:

1) **Advance Planning;**
2) **Imminent Flooding (*Action Level**** **occurs); and**
3) **Emergency Flooding (*Flood Level**** **occurs).**

* *Action Level* and *Flood Level* are depicted in the photo to right.

---

1) <u>ADVANCE PLANNING</u> – <u>Responsibility – Safety Manager, Environmental Manager and APMs</u>

Preparation for a storm will ensure the facility has sufficient supplies to keep people safe and operate if conditions allow. These items (and responsible departments) include:

a) **Safety**: In the event that the facility is expecting a severe storm or flooding situation there are certain safety precautions that must be planned for (**Purchasing**):
   i) Power loss – ensure sufficient flashlights and batteries are available to last for the duration of the storm. If a large storm is predicted, ensure generators are tested in advance.
   ii) Identify a source for potable water and have adequate supply at the facility and a means to have more delivered or picked up.
   iii) Make arrangements for supply of food for vending machines or with an outside source to have delivered for employees who may be stranded at the facility.
   iv) Should the storm be projected to last more than 24 hours, make arrangements for provision of cots, blankets and pillows.

b) Commodities: Stock extra quantities in advance in case deliveries are slowed or blocked.
   i) Coke, lime (**Furnace**)

ii) Soda ash, caustic, peroxide, ferric, cobalt, etc. (**Water Quality**)
iii) Diesel fuel for equipment and generators (**Maintenance-Mobile Equipment**). Top-off all fuel storage tanks. For larger storms, ensure the propane tank is completely filled.

c) Storm barriers & equipment: a roll-out barrier is staged in a box behind the jersey barrier at the Southeast corner opposite the guard shack for rapid deployment.
   i) Sandbags (**Facility Environmental**)
   ii) Jersey barriers (**Facility Environmental**)
   iii) Roll-out barrier (**Facility Environmental**)
   iv) Chains and straps to move Jersey barriers (if needed) (**Maintenance**)

Departments will be responsible for establishing and enacting their area-specific plans. Priorities to consider include:

a) Inspecting backup generators (**Maintenance**)
b) Moving critical equipment, expensive materials, and valuable records to safe locations (**All Departments**)
c) Ensuring loose items stored outside are secured from wind (**Responsible Departments**)
   i) Rooftop and baghouse area tarps (Air Quality)
   ii) Engineering laydown (tarped materials) – (Engineering)
   iii) On-site stores warehouse (Maintenance)
   iv) Other miscellaneous (All Departments)
d) Moving chemicals stored outside to safe locations. These include:
   i) Peroxide (**Water Quality**)
   ii) Caustic (**Water Quality**)
   iii) Cobalt (**Water Quality**)
   iv) TSP on racks (**Battery Wrecker**)
   v) Battery Storage Area (**Battery Wrecker**)
   vi) Chemicals on trailers (**Refinery**)
e) Evaluating the quantity of inbound trucks (**Shipping/Receiving**)
f) Maximizing storm and hill tank capacities – pump down all tanks in advance (**Crystallizer & Water Quality**)
g) Ensuring backup pumps are operational and free of debris (to prevent clogs)
   i) Diesel storm pump (**Water Quality**)
   ii) Rail sump pump (**Crystallizer**)
h) Establishing no-parking zones along the west side of the employee parking lot (**Facility Environmental**); note that employees would then have to park on the hill west of the guard shack where trucks normally queue. This is done on one side of the hill and employees will need to park nose-in at an angle to maximize space (have guard assist in coordination).
i) Minimizing debris:
   i) In rail sump trenches (**Crystallizer**)
   ii) On rail concrete (**Facility Environmental**)
   iii) Garbage (**All Departments**)
   iv) Inside the storm tank containment (**Water Quality**)

2) ***IMMINENT FLOODING***

Flooding is imminent when the unnamed creek along the western boundary of the facility reaches the "Action Level" as shown on the photo above. A laminated copy of this document is posted on the fence line south of the main gate to the facility.

a) The Security Officer's (Guard) role: The **Safety Manager and/or Environmental Manager** will provide periodic training for Guards regarding the importance and contents of the plan. The on-duty Guard will perform the following functions to assist in mitigating this potential threat to our employees and infrastructure:

i) During stormy weather, the Guard will monitor the water level on the unnamed creek at the main gate.

ii) If/when the action level is achieved, the Guard will contact the Smelter Supervisor by telephone (845-673-2230) and/or radio continuously until they are reached.

iii) When contact has been made the Guard will inform the Smelter Supervisor that action level has been reached and that the Emergency Flooding Plan (**Section 2b** below) should be initiated immediately. The Guard will ask the Smelter Supervisor if he holds a copy of the Emergency Flooding Checklist and Map. If the answer is no, the emergency flooding checklist can be found in this document and the document is located on I-Share: (http://servsharepoint/middletown/controlleddocuments/Plant%20Contingency/Forms/AllItems.aspx). Flood preparations need to be implemented at thaft time.

iv) Once this exchange has been made with the Smelter Supervisor the following communications shall take place by the Guard to inform individuals that flood preparations have begun:

(1) Environmental APM
(2) Plant Manager
(3) Safety Manager
(4) EHS Compliance Mgr.

The above individuals are responsible for contacting the Assistant Plant Managers, who will notify the respective Department Managers.

v) PM to send, or instruct to one of listed managers above, an e-mail with a subject of: **PLANT FLOOD PREPARATIONS IN EFFECT** to -*MIDPLANT*. Copy and Paste the following statement into the Body of the E-mail:

> **"ATTENTION: The action level on the unnamed creek has been reached and the Smelter Supervisor has been notified. Flood Preparations are being made at this time. Department managers shall ensure that proper preparations have or are being made at this time."**

vi) The Guard will continue to monitor water levels until such conditions no longer are a threat to the employees and the infrastructure of this facility.

b) Facility Response

i) The Primary or Alternate Emergency Coordinator, or Smelter Supervisor (off-shifts), shall be the Emergency Response Coordinator by default, unless another Coordinator is named by the Plant Manager.

ii) The Coordinator shall make a radio announcement that flood waters are rising and all hands are needed on deck. Personnel shall follow departmental plans to safely shut down and prepare for the flood. The Coordinator shall direct facility personnel to:

(1) Open all security gates.

(2) Deploy the roll-out flood barrier from the guard shack to the Kettle Baghouse / 100' stack area (**Facility Environmental with assistance as needed**). SWIs for deployment are located on I-Share: http://servsharepoint/middletown/controlleddocuments/Middletown%20Plant/Forms/AllItems.aspx?RootFolder=%2Fmiddletown%2Fcontrolleddocuments%2FMiddletown%20Plant%2FSOP%2DSWI&FolderCTID=0x0120009A2C8F105559BF4FAA83B81AB5B49861&View={704052BD-1E73-4776-B72D-57B52DEB0135} and posted near the flood barrier bin near the base of the 100' stack.

(3) Notify truck drivers

(a) Move all processed trucks out of the facility ASAP

(b) Trucks in the back lot will need to stay put

(c) Driveway must be kept clear for emergency vehicles

(d) Inbound drivers may need to be rerouted

(e) Front Drive (entrance) truck parking spaces may need to be utilized by employees

(4) Use several forklifts and chains/straps to position Jersey barriers as depicted on the attached **Weather Emergency Map below**.

Based on an assessment of potential severity of flooding, initiate the following actions:

(A) Initiate shutdowns of furnace(s) and refining kettles, battery wrecker equipment and other electrical systems that may be affected by rising flood waters.

(B) Move critical equipment, expensive materials and valuable records to safe locations.

(C) Anchor material storage tanks which are susceptible to floating.

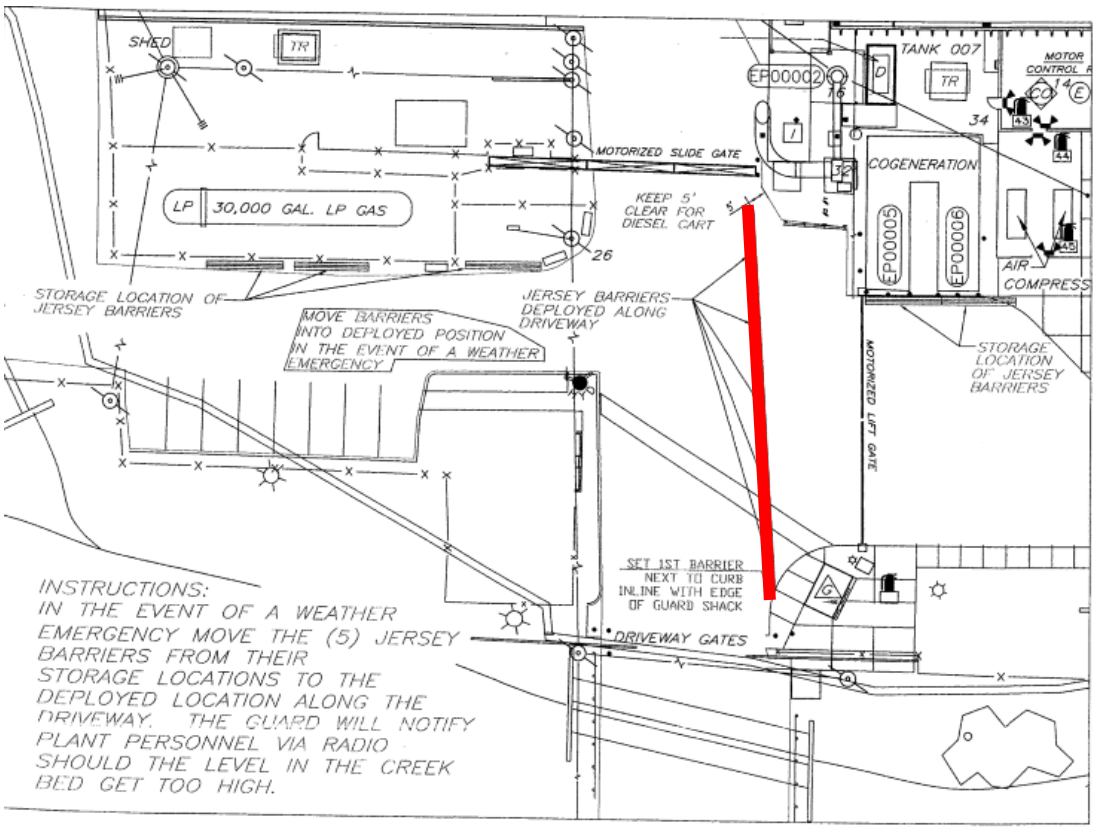
(D) Move water-soluble or water reactive chemicals to a safe location. Existing storage locations (Trailers in East Lot; Sheds in East Refinery) should be adequate but should conditions in these areas change for any reason, these should be first chemicals to move to a dry/safe area.

(E) As appropriate, construct dikes around critical buildings and materials to restrict entry of water.

(F) Shut down utility (gas and electric) services before flooding occurs.

(G) Remove all materials from the outside permitted battery storage area if necessary.

Reference Facility Flood Preparation Checklist



(5) A DELAY HERE COULD BE COSTLY – 10 MINUTES MIGHT BE THE DIFFERENCE BETWEEN SECURITY AND DISASTER.
(6) Position sandbags where needed:
  (a) In front of the doors to the office building
  (b) In front of crystallizer load out area
(7) Install "Campbell Dams" across main scrubber roll-up door, and sandbags in front of all other ETP and scrubber doors.

"Campbell Dams" deployed at Scrubber

3) EMERGENCY FLOODING

Emergency flooding occurs when the unnamed creek along the western boundary of the facility reaches the "Flood Level" as shown above.

a) The on-duty Guard shall notify the Smelter Supervisor (Coordinator) when water reaches the Flood Level.
b) The Coordinator shall
  i) Make a radio announcement that the flood is beginning.
  ii) Prepare for potential power loss
    (1) Negative Pressure considerations
      (a) Ensure all overhead doors are closed **(APMs)**
      (b) Ensure all Busch Units are operating **(AQ team)**
    (2) Consider diverting water from reaching the main stormwater alley (white) shed's stormwater pump (which is not on backup power) if power is lost and the diesel back-up pump cannot keep up.
  iii) Consult with the Plant Manager to determine if:
    (1) Plant production needs to cease for an extended time
    (2) Certain personnel (oncoming shifts) should be notified to stay home
  iv) Evaluate the status of flood preparations **(PM, APMs, EM and Safety Manager)**
  v) Ensure the safety of all personnel:
    (1) Send a scout team of two people around the facility to ensure all personnel are safe inside the main building (**Safety Manager** for non-respirator areas, **Furnace Manager** for respirator areas inside the plant).
    (2) Establish a head count by name and do not allow anyone to leave the facility **(Safety Manager**).
    (3) Shelter in Place – do not evacuate the facility; shelter in place.
    (4) Always stay clear of running flood waters and low-lying areas of the facility.
    (5) In the event that flood water begins to enter the facility, **APMs and Maintenance Manager to** shut down electric, gas or propane, and oxygen supply to those areas. If local shut off cannot be located, then the main supply will need to be shut off.

(6) Never enter areas that are flooded without verifying that power has been cut.
(7) Always work in pairs, never venture out alone.
(8) Assess employee shifts (not greater than 12 hours)

c) The Guard shall inform the Smelter Supervisor when the stream has dropped below the Flood Level.

4) POST FLOOD WORK

After the flood, the Coordinator shall work with appropriate personnel to determine if conditions are safe. Once assessed to be safe, the Coordinator shall direct personnel on post-flood priorities and guide the facility's return to normal operation.

Emergency Procedures - Flood Event Preparation/Action Checklist

Facility Prep	***Completion*** *(Check Box When Complete)*
1. *Driveway diversion barrier is permanently staged next to the backup generators across the driveway (and to the East of the Guard Shack (see Drawing).*	
2. *Sandbags are staged on pallets near the Crystallizer and back up generators*	
3. *Construct dikes around all building doors (sandbags 2x high in an arc to allow doors to open)*	
4. *Flatbed truck and forklift staged to deliver supplies as needed*	
5. *Diesel tanks are topped off 24-hrs prior to major tropical storm/hurricane forecast*	
6. *Back-up generators are ordered 24-hrs prior to major tropical storm/hurricane forecast*	
7. *M-15's are prepped in case of power outage*	
8. *Critical equipment, expensive materials and valuable records are moved to safe locations*	
9. *Employees are assigned to install barriers upon notification*	
10. *PM/APMs advises HR on communications to incoming employees*	
IF it (the storm) hits – assume we will install all barriers and sandbag most doorways	
Front gate closed	
Two other gates opened for clear access	
Close the plant?	
Stop all production?	
• Power loss potential	
• Need for manpower elsewhere	
• Employees out of harm's way	
Cannot ship product or other materials	
• Trucks on hill must leave to keep driveway clear for emergency services	
• Trucks on back lot must stay	
No new deliveries or outgoing loads	
• Divert inbound trucks to warehouse	

Employee Parking Lot	
• *Need to move employee cars prior to flooding*	
• *Assign personnel to monitor parking lot and initiate vehicle movement as necessary*	
• *Area lighting may require generator backup*	
• *Develop plan for alternative employee parking in case of flooding of primary lots*	
All flood barriers up at scrubber – man doors and roll-up door	
• *Scrubber blower in harm's way*	
• *Scrubber oxy pumps and motors in harm's way*	
• *Scrubber blower motors in harm's way*	
• *Other Scrubber pumps and motors in harm's way*	
• *Scrubber control panel in harm's way*	
Installing dams upstream of Acid Neutralization, near BW West Yard Door	
• *Back up water in outside yard between BSA and Containment building*	
• *Slow down rush of water to scrubber building*	
EPT Containment filling up with water	
• *Pumps and motors under water – if occurs – no one enters containment while power is on*	
• *Discharge issues*	
• *Do we have extra pumping capacity?*	
• *Is the green shed backed up? – prepared for breech of containment wall (sampling)*	
• *Safe access for personnel to collect samples (location tbd)*	
Hill tanks 2 & 3 ready to receive water	
• *Crystallizer sump set up to go to hill tanks if necessary*	
• *Crystallizer has second pump ready as backup*	
Rail sumps	
• Inspect rail sumps to ensure they are clear of debris	

• Clean rail concrete areas	
General safety	
• Establish site coordinator – this person will keep focus on safety	
• Electrical safety – flooded MCC in Scrubber Building	
• Drums or other chemical materials (floating in pooled waters)	
• Outdoor chemical storage	
○ Commercial Sulfuric Acid totes	
○ Peroxide totes	
○ Caustic totes	
○ Cobalt totes	
○ TSP on Racks	
○ Garbage	
○ Hazardous Waste Bins	
○ Flooded equipment	
Environmental	
• *Negative pressure system on backup power*	
• *Overhead doors closed to maintain negative pressure*	
• *Busch Units operating*	
• *BSA free of hazardous materials*	
• *Anchor material storage tanks susceptible to floating*	
• *Extend vent pipes above expected water levels to prevent contamination*	
• *Move water soluble or reactive materials to safe location'*	
• *Review other sensitive environmental systems for backup power*	
• *ETP – prepare for direct discharge and contingency for loss of power*	
• *Lab prepared for sampling of water leaving containment (if needed)*	
Employee Safety	
• *Provisions for employees stuck at plant (food, sleeping, etc.)*	
• *Assess employee shifts to avoid 12+ hours*	
Operations	
• *Initiate shutdown of furnace(s) and refining kettles as necessary*	
• *Shut down utilities (gas, electric, O2) prior to flooding*	

Attachment 1

SWI's Incorporated by Reference

- **043-MDT-SWI-002 Folding Water Gate for Storage**

- **043-MDT-SWI-003 Drying the Water Gate prior to putting back into crate**

- **043-MDT-SWI-004 Installing Water gate for front Driveway**

Ecobat Resources
Permit Modification Log
(inclusive of August 2023 & February 2024 modifications)

Ecobat Resources New York, LLC (f/k/a: Revere Smelting & Refining Corporation)

Permit Modification Log

The name of the specific document being modified (sections, and/or attachments)	Modified page numbers		Date of Revised Pages	The effective date of permit modification	The nature of the modifications
	Old	New			
Revere Permit Inc. Doc. #6 - Integrated Contingency Plan	Entire Plan	Same	Dec-17	6/13/2018	Section 14.6 Decontamination Procedures for Acids and Caustics was added to the plan; Appendix G was updated for a new petroleum storage tank location (Table 2 and description in the text of App. G); Emergency Notification List was updated to add new Assistant Plant Manager; Chemical Inventory List was updated; Site Plan was updated
Revere Permit Inc. Doc. #4 - Security and Inspection Plan Appendix 3-B	Appendix 3-B	Same	Dec-17	6/13/2018	Added section for production building and finished goods warehouse. Added requirement to move broken containers and clean spills immediately upon discovery. Removed question regarding whether broken mercury bulb containers are less than 60 days old. Added satellite accumulation locations in AQ Conex, Motor Pool tool room, QC Laboratory Used Plastics, EHS Office. Removed accumulation date question for Motor Pool Used Oil Absorbent Drum and Shipping Dock Aerosol Spray Collection. Removed the revisions section from submittal.
Revere Permit Inc. Doc. # 5 - Personnel Training Plan Appendix 4-A and Appendix 4-B	Appendix 4-A and Appendix 4-B	Same	Dec-17	6/13/2018	App. 4-B: Modified trainer name and regulatory citations; App. 4B: Updated All Job Descriptions
Revere Permit Attachment A - Part A Application Facility Layout (Site Plan);	Site Plan	Same	Jan-18	6/13/2018	Updated Site Plan to include Facility configuration changes (outdoor battery storage area dock, movement of chemical storage, etc…)
Revere Permit Inc. Doc. #2 - Operations Plan	Page 37 (Text was modified, but caused formatting) - Replacement of Entire Plan	Same	1/1/2018 and 03/15/2018	6/13/2018	Updated Text on Page 37 to include new construction details of shucking bin (this caused format to change, therefore entire plan is included with updated footer as modified)
Revere Permit Inc. Doc # 2 - Operations Plan Appendix 1-B - Site Map with Traffic Patterns	Appendix 1-B	Same	Jan-18		Updated Site Plan to include Facility configuration changes (outdoor battery storage area dock, movement of chemical storage, etc…); Updated Site Map with Traffic Patterns to incorporate new outdoor battery storage area dock
Revere Permit Inc. Doc #7 - Interim Site Management Plan	Entire Text Section and SWMU List	Same	Mar-18	6/13/2018	Updated footer for entire text section and Updated Master SWMU List to include: Sump, Smelter Main Entrance
Schedule 1 of Module 1, Exhibit B	Page B-5	Same	Mar-18	6/13/2018	NYSDEC will modify this Section and provide updated page.
Above Modifications were submitted in March 2018					
Revere Permit Attachment A - Part A Application Facility Layout (Site Plan);	Site Plan	Same	Feb-19	6/25/2019	Updated Site Plan to include Facility chemical storage locations
Revere Permit Inc. Doc. #2 - Operations Plan	Replacement of Entire Plan	Same	May-19	6/25/2019	Updated Text on Page 38 to include new Gantry Crane Installation and text on page 41 to address ARC panel installation and text on page 58 for clarification of piping (this caused format to change, therefore entire plan is included with updated footer as modified)
Revere Permit Inc. Doc # 2 - Operations Plan Appendix 1-B - Site Map	Appendix 1-B	Same	Feb-19	6/25/2019	Updated Site Plan to include Facility chemical storage locations
Revere Permit Inc. Doc. #4 - Security and Inspection Plan Appendix 3-B	Appendix 3-B	Same	Jan-19	6/25/2019	Added a check for container labeling and signage and inspection timeframe
Revere Permit Inc. Doc. # 5 - Personnel Training Plan Appendix 4-A and Appendix 4-B	Appendix 4-A and Appendix 4-B	Same	May-19	6/25/2019	App. 4-B: Modified trainer name; App. 4B: Updated All Job Descriptions
Revere Permit Inc. Doc. #6 Appendix K Plot Plan	Appendix K	Same	Feb-19	6/25/2019	Updated Site Plan to include Facility chemical storage locations

Revere Permit Inc. Doc #7 - Interim Site Management Plan	Replacement of Plan	Same	May-19	6/25/2019	Updated footer for entire text section and References to revised Groundwater Monitoring Plan
Revere Permit Inc. Doc #7 - Interim Site Management Plan Appendix 7-B	Replacement of Plan	Same	May-19	6/25/2019	Revised entire Groundwater Monitoring Plan
Above Modifications were submitted in May 2019					
Revere Permit Attachment A - Part A Application Facility Layout (Site Plan);	Site Plan	Same	May-20	6/1/2020	Updated Site Plan to include Facility chemical storage locations and storage areas
Revere Permit Inc. Doc # 2 - Operations Plan Appendix 1-B - Site Map	Appendix 1-B	Same	May-20	6/1/2020	Updated Site Plan to include Facility chemical storage locations and storage areas
Revere Permit Inc. Doc. #4 - Security and Inspection Plan Appendix 3-B	Appendix 3-B	Same	Mar-20	6/1/2020	Reformatted Form
Revere Permit Inc. Doc. # 5 - Personnel Training Plan Appendix 4-A and Appendix 4-B	Appendix 4-A and Appendix 4-B	Same	Apr-20	6/1/2020	App. 4-B: Modified trainer name; App. 4B: Updated All Job Descriptions
Revere Permit Inc. Doc. #6 - Integrated Contingency Plan	Replacement of Plan	Same	Feb-20	6/1/2020	Updated emergency notification list, description of emergency equipment to include air horns, updated chemical inventory and Site Plan
Revere Permit Inc. Doc. #6 Appendix K Plot Plan	Appendix K	Same	May-20	6/1/2020	Updated Site Plan to include Facility chemical storage locations and storage areas
Above Modifications were submitted in May 2020					
Revere Permit Attachment A - Part A Application Facility Layout (Site Plan);	Site Plan	Same	Jan-21	3/9/2021	Updated Site Plan to include Facility chemical storage locations and storage areas
Revere Permit Inc. Doc # 2 - Operations Plan Appendix 1-B - Site Map	Appendix 1-B	Same	Jan-21	3/9/2021	Updated Site Plan to include Facility chemical storage locations and storage areas.
Revere Permit Inc. Doc. #2 - Operations Plan	Replacement of Entire Plan	Same	Jan-21	3/9/2021	Updated Text (page 38 and 39) in section 8.1.1 "Activities Conducted in Containment Building" to include a description of desulfurization activities in the containment building (this caused format to change, therefore entire plan is included with updated footer as modified)
Revere Permit Inc. Doc. #4 - Security and Inspection Plan Appendix 3-B	Appendix 3-B	Same	Jan-21	3/9/2021	Updated weekly hazardous waste inspection to reflect relocated satellite accumulation areas
Revere Permit Inc. Doc. # 5 - Personnel Training Plan Appendix 4-A.	Appendix 4-A	Same	Jan-21	3/9/2021	Added a new policy to training syllabus
Revere Permit Inc. Doc. #6 - Integrated Contingency Plan	Replacement of Plan	Replace all pages	Dec-20	3/9/2021	Updated Orange Regional to Garnet Health Medical Center; Updated Notification List to include new APM and Compliance Mgr. phone numbers for emergency services. Added new Flood Preparation Procedure. Updated section for agreements with emergency responders. Added Quick Reference Guide (Section III) and changed references in core plan from III to IV.
Revere Permit Inc. Doc. #6 Appendix K Plot Plan	Appendix K	Same	Jan-21	3/9/2021	Updated Site Plan to include Facility chemical storage locations and storage areas
Revere Permit Inc. Doc. #7 - Interim Site Management Plan	Replacement of Entire Plan	Same	Jan-21	3/9/2021	Added SWMU to list and document formatting (i.e., footer)
Above Modifications were submitted in January 2021					
Revere Permit Inc. Doc. #6 - Integrated Contingency Plan	Replacement of Plan	Same	Nov-21	12/1/2021	Updated Company Name, added overview for managing injuries and incidents, removed emergency contact, updated SDS listing
Revere Permit Inc. Doc. # 5 - Personnel Training Plan Appendix 4-A.	Appendix 4-A	Same	Nov-21	12/1/2021	Removed an outdated ISO reference and added a new policy to training syllabus
Revere Permit Inc. Doc. #9 - Trailer Park Area Construction Completion Report - Addendum	Addendum to Incorporated Document #9	Same	Nov-21	12/1/2021	Addendum to Incorporated Document #9 - description of construction and construction drawing showing modification to covered trailer parking structure.
Above Modifications were submitted in November 2021					
Revere Permit Attachment A - Part A Application Facility Layout (Site Plan);	Site Plan	Same	Jul-22	9/30/2022	Updated Site Plan to include new desulfurization tanks and other minor changes.
Revere Permit Inc. Doc # 2 - Operations Plan	Replacement of Plan	Same	Jul-22	9/30/2022	Updated description of activities conducted in Containment Building to include new filter press. Updated VP of Operations
Revere Permit Inc. Doc # 2 - Operations Plan Appendix 1-B - Site Map	Appendix 1-B	Same	Jul-22	9/30/2022	Updated Site Plan to include new desulfurization tanks and other minor changes.

Revere Permit Inc. Doc. #6 - Integrated Contingency Plan	Replacement of Plan	Same	Aug-22	9/30/2022	Updated Emergency Notification List, SDS Listing and authority to commit resources letter to reflect new plant manager. Updated footers of document to reflect modification date.
Revere Permit Inc. Doc. #6 Appendix K Plot Plan	Appendix K	Same	Jul-22	9/30/2022	Updated Site Plan to include new desulfurization tanks and other minor changes.
Revere Permit Inc. Doc. #7 Interim Site Management Plan	Update to SWMU List	Same	Aug-22	9/30/2022	Update to SWMU List
Above Modifications were submitted in August 2022					
Schedule 1 of Module 1, Exhibit A	A-3 and A-4	Same	10/27/2022	10/27/2022	Contact Information updates to do Department Re-organization
Above Modifications were a NYSDEC Initiated Administrative Modification					
Ecobat Permit Attachment A - Part A Application Facility Layout (Site Plan);	Site Plan	Same	Aug-23		Updated Site Plan to include new DEF Fluid Storage, Pelletizer Dust Collector, New Oxygen Vaporizers and Tanks, New Trailer Parking Area, relocated mobile equipment parking and trash compactor and other minor changes.
Ecobat Permit Inc. Doc # 2 - Operations Plan Appendix 1-B - Site Plan	Appendix 1-B	Same	Aug-23		Same as Above (Site Plan)
Ecobat Permit Inc. Doc. #4 - Appendix 3B	Appendix 3B	Page 10	Aug-23		Added Section to address Vehicle Wash Logs
Ecobat Permit Inc. Doc. #5 - Personnel Training Plan Appendix 4A	Appendix 4A	Same	Aug-23		Added active shooter training, added Fall Protection Program to policy section, added Site Specific Presentation to the row for SPCC Plan.
Ecobat Permit Inc. Doc. #6 - Integrated Contingency Plan	Replacement of Plan	Same	Aug-23		Updated header with current company logo (Ecobat), changed all references of Revere to Ecobat, updated Site Plan, Added 911 above notification list and updated titles of contacts. Removed reference to hardcopy SDSs and updated SDS Listing. Updated footers of document to reflect modification date.
Ecobat Permit Inc. Doc. #6 - Appendix K Plot Plan	Appendix K	Same	Aug-23		Same as Above (Site Plan)
Above Modifications were submitted in August 2023					
Final Permit Attachment A - Part A Application Text	Form 8700-12 (Pages 1-4)	Same	Feb-24		Updated Company Name to Ecobat Resources New York, updated Site Contact and Owner Name/Address. Updated certification signature on Page 4 to accompany changes to Page 1.
Above Modifications were submitted inFebruary 2024					