

**CONTINGENCY PLAN
FOR ENVIRONMENTAL INVESTIGATION AND
REMEDIAL WASTE ACTIVITIES CONDUCTED BY
ENCORE**

**FORMER WILLOW RUN ASSEMBLY PLANT
COMPANY VEHICLE OPERATIONS
YPSILANTI, MICHIGAN**

**Prepared For:
Environmental Corporate Remediation (ENCORE)**

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LIST OF ABBREVIATIONS

CRA	Conestoga Rovers & Associates, Inc.
CFR	Code of Federal Regulations
CVO	Company Vehicle Operations
CVOC	Chlorinated Volatile Organic Compounds
DNAPL	Dense Non-Aqueous Phase Liquid
ENCORE	Environmental Corporate Remediation
GM	General Motors
kg	Kilogram
LEPC	Local Emergency Planning Committee
LGQ	Large Quantity Generator
LNAPL	Light Non-Aqueous Phase Liquid
MDEQ	Michigan Department of Environmental Quality
NRC	National Response Center
NREPA	Natural Resources and Environmental Protection Act
PEAS	Pollution Emergency Alerting System
PCB	Polychlorinated Biphenyls
PPE	Personal Protective Equipment
RCRA	Resource Conservation and Recovery Act
SAA	Satellite Accumulation Areas
SQG	Small Quantity Generator
TCE	Trichloroethene
US EPA	United States Environmental Protection Agency

1.0 INTRODUCTION

Conestoga-Rovers & Associates, Inc. (CRA) was retained by Environmental Corporate Remediation (ENCORE), a wholly owned subsidiary of General Motors (GM), to prepare this Contingency Plan for environmental investigations and remedial activities at the former Willow Run Assembly Plant - Company Vehicle Operations (CVO) located in Ypsilanti, Michigan (Site). The actions described in this plan are only applicable to emergencies directly or indirectly associated with environmental investigations or remedial activities. The Site location is presented on Figure 1.1.

The following sections provide a description of the facility as well as the purpose and contents of this Contingency Plan.

1.1 FACILITY IDENTIFICATION

The Site is located on the former Willow Run Assembly Plant property and is currently being used for storage, maintenance and recovery of parts from company vehicles used by GM. The Site is located at 2901 Tyler Road, Ypsilanti, Michigan on the north side of Tyler Road, between Wiard Road and Airport Road in Washtenaw County. Tyler Pond is located north of the Site. A Site plan is presented on Figure 1.2.

Prior to 1940 the Ford Motor Company (Ford) owned a large section of undeveloped land including the site of the current Willow Run facility. In 1941 the United States Defense Plant Corporation of America purchased the Willow Run facility and directed Ford to construct and operate a bomber production plant. The Kaiser-Frazer Company (Kaiser-Frazer) leased the bomber plant and CVO area from the War Asset Administration in November 1945 and purchased the facility in December 1948. Kaiser-Frazer owned the property until its sale to GM in December 1954. GM is a currently the owner of the Site.

1.2 PLAN PURPOSE

CRA, on behalf of ENCORE, is conducting environmental investigations and remedial activities to address certain subsurface conditions at the Site. These activities will result in the generation of hazardous and non-hazardous wastes (described in Section 2.2). This Contingency Plan pertains specifically to hazardous waste generated from environmental investigations and remedial activities at the Site and describes the course of action to be followed in case of a fire, explosion, or release of hazardous waste or

hazardous waste constituents that could threaten human health or the environment (40 CFR 265.51[a]).

This Contingency Plan is associated with hazardous wastes generated from environmental investigations and remedial activities only. Hazardous wastes generated and stored at the Site resulting from the general Site business operation are outside the scope of this Contingency Plan.

1.3 CONTENTS OF CONTINGENCY PLAN

This Contingency Plan describes the actions CRA personnel and Site personnel (security and Site employees) will take in response to fire, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. The Contingency Plan includes the following:

- Regulatory requirements;
- Designation of the *Emergency Coordinator* and *Alternate Emergency Coordinators*;
- Criteria to aid the *Emergency Coordinators* in making the decision to implement the provisions of the Contingency Plan;
- Emergency procedures to be followed in the event of an imminent or actual emergency situation;
- Description of available emergency and spill-control equipment;
- Arrangements made with the emergency response contractor;
- Facility evacuation plan;
- Notification and required reports; and
- Coordination with outside agencies.

2.0 GENERAL INFORMATION

This section provides general information regarding the regulatory requirements for implementation of this Contingency Plan. Notification of local, state, and federal agencies is required if the facility has a release, fire, or explosion that could threaten human health or the environment outside the facility. Information regarding the generation and storage of hazardous waste at the Site is presented in Section 2.2. Verbal and written reporting requirements are specified in Sections 5.0 and 9.0 of this Contingency Plan.

2.1 REGULATORY REQUIREMENTS

This Contingency plan has been prepared in accordance with the requirements of 40 CFR Part 265 Subpart D and Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended (Act 451), Rule R299.9607. It is designed to establish the necessary planned procedures to be followed in the event of an emergency situation at the Site, such as a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or water.

The provisions of this plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

Many of the environmental investigation and remedial activities carried out by CRA will generate 1,000 kilograms (kg) or more of hazardous waste per calendar month, resulting in a large quantity generator (LQG) status. However, there may be months in which the generation of hazardous waste will be in quantities between 100 kg and 1,000 kg (small quantity generator (SQG) status). This Contingency Plan will be implemented as required, regardless of generator status (LQG or SQG). The Site's Hazardous Waste Generator ID: MIK468293311 currently covers waste generated by ENCORE through its remediation activities and does not cover waste generated by the Site's current operator QEK. QEK operates under its own generator ID, MID058810961.

2.2 HAZARDOUS WASTE MANAGEMENT

Light non-aqueous phase liquid (LNAPL), dense non-aqueous phase liquid (DNAPL), polychlorinated biphenyls (PCBs), lead, and chlorinated volatile organic compounds

(CVOCs; including trichloroethene (TCE) and degradation byproducts of TCE) are the primary constituents of concern at the Site in environmental media associated with the environmental investigations and remedial activities. LNAPL, DNAPL, PCBs, lead, and CVOCs are found in soil and/or groundwater in some areas of the facility.

The environmental investigation and remedial activities may include, but are not limited to the following:

- Drilling soil borings;
- Installing/abandoning monitoring wells;
- Developing, purging and sampling monitoring wells;
- Removal of LNAPL/DNAPL from monitoring/recovery wells;
- Test pitting; and
- Soil excavating.

The types of wastes (non-hazardous and hazardous) that will be generated during the environmental investigation and remedial activities described above may include:

- DNAPL/LNAPL
- Soil cuttings;
- Purged groundwater;
- Excavated drums and buried refuse;
- Decontamination fluids;
- Personal protective equipment (PPE); and
- Other debris (e.g., asphalt, concrete, plastic sheeting, tubing).

Prior to being shipped off Site for treatment or disposal, non-hazardous and hazardous wastes will be segregated into liquid and solid waste, non-hazardous and hazardous streams, and will be stored in 55-gallon drums (in overpacks) and/or roll-off containers or frac tanks. Drums of purged groundwater and soil cuttings, as well as overpacks of excavated drums, will be temporarily stored at the Remediation Waste Storage Area. Drums of DNAPL and used personal protective equipment (PPE) will be temporarily stored at the Satellite Accumulation Areas (SAAs). The locations of the Remediation Waste Storage Area and the SAAs are presented on Figure 1.2. Roll-off containers and frac tanks will be temporarily located at various locations throughout the Site, depending on the area of environmental investigation and remedial activities.

Should the environmental investigation and remedial activities generate waste classified as hazardous, each container of hazardous waste (i.e., drums, roll-off containers, frac tanks) shall be clearly labeled with the words "Hazardous Waste" and the appropriate waste codes and accumulation start date. Drums stored in SAAs will be labeled with the words "Hazardous Waste" and the appropriate waste codes. The accumulation start date will be added once 55-gallons of waste have been accumulated. Should the environmental investigation and remedial activities generate more than 1,000 kg of hazardous waste in any calendar month, no hazardous waste will be stored on Site for more than 90 days, in accordance with the requirements for LQGs. Waste will not be stored in containers incompatible with the waste. The containers shall be protected from any accidental impacts, etc., that may cause damage resulting in a leak or spill of hazardous waste. Overpack containers for damaged drums or excavated drums will be used when necessary. Hazardous waste management activities will comply with the requirements for generators specified in 40 CFR 262.

3.0 EMERGENCY COORDINATORS

At all times there is at least one employee, either on the Site or on call and within reasonable travel distance of the Site, with the responsibility for coordinating all immediate emergency response measures. The list of employees designated as primary and alternate emergency coordinators for the Site is presented in Table 3.1. In addition, to ensure the most timely response possible to an imminent or actual emergency situation, Table 3.1 also presents contact personnel from CRA and ENCORE who will assist the *Site Emergency Coordinators* during the immediate emergency response activities, notification, and the control and containment phases (Section 5.1 and 5.2). CRA and ENCORE personnel will be responsible for all follow-up activities (Section 5.3).

To effectively carry out the Contingency Plan, the *Site Emergency Coordinators*, as well as CRA and ENCORE personnel, will be thoroughly familiar with all aspects of the Contingency Plan, operations and activities, the location and characteristics of wastes handled, the location of waste records, the location and use of emergency equipment, and the facility layout. The *Site Emergency Coordinators*, as well as the CRA and ENCORE personnel, listed in Table 3.1 will have the authority to commit the resources necessary to carry out this Contingency Plan.

4.0 IMPLEMENTATION OF THE CONTINGENCY PLAN

Implementation of this Contingency Plan is limited to incidents involving waste generated during environmental investigations or remedial activities.

The *Site Emergency Coordinator* must be contacted immediately in the occurrence of any situation that may result in potential or actual threats to human health or the environment. The decision to implement this Contingency Plan will be made by the *Site Emergency Coordinator* and will depend on whether an imminent or actual hazard exists which could threaten human health or the environment. The *Site Emergency Coordinator* will use professional judgment in making this determination.

The following sections provide criteria to aid the *Site Emergency Coordinator* in making the decision to implement this Contingency Plan.

4.1 SPILLS

For incidents involving spills of hazardous waste generated from environmental investigations and/or remedial activities, the following situations may result in implementation of the Contingency Plan, depending upon the circumstances of the spill:

- A spill of hazardous waste or hazardous waste constituents from drums or tanks which could result in the release of hazardous waste to the environment (directly to soil, groundwater, or surface water or via sanitary or storm sewer);
- A spill of hazardous waste or hazardous waste constituents from drums or tanks which could be contained on-Site, but the potential exists for soil and/or groundwater contamination (on-Site); and
- An on-Site spill of hazardous waste from drums or tanks which results in off-Site surface water, groundwater or soil contamination.

4.2 FIRE OR EXPLOSION

The hazardous wastes that will be generated during environmental investigations and/or remedial activities are not expected to be flammable. However, for incidents involving a fire that may affect the hazardous waste generated from environmental investigation and/or remedial activities and stored on-Site, the following situations may result in implementation of the Contingency Plan:

- A fire which could cause the release of hazardous waste or hazardous waste constituents and/or toxic fumes from hazardous waste;
- A fire associated with any materials, which, if it spread, could ignite materials at other locations at the facility or cause heat-induced explosions; and
- The use of water or chemical fire suppressants, which could result in contaminated runoff from hazardous waste.

The hazardous wastes that will be generated during the environmental investigations and/or remedial activities will not be explosive. However, for incidents involving an explosion that may affect the hazardous waste generated from environmental investigations and/or remedial activities and stored on-Site, the following situations may result in implementation of the Contingency Plan:

- An imminent danger of explosion which could produce flying fragments or shock waves that could affect hazardous waste; and
- An imminent danger of explosion which could result in the release of hazardous waste or hazardous waste constituents from hazardous waste.

5.0 **EMERGENCY RESPONSE PROCEDURES FOR SPILLS, FIRES AND EXPLOSIONS**

This Contingency Plan is intended to provide an orderly means of handling emergencies that may involve hazardous waste generated from environmental investigations and/or remedial activities. This section outlines, in order, the steps to be taken in the event of an emergency.

The first priority in any emergency situation is to protect the health and safety of all personnel. The emergency situation will be controlled or contained if this can be done without undue risk to CRA personnel, CRA contractors, Emergency Response Team (Inland Waters), and Site operator's employees working at the Site. From here forward, all persons responding to the emergency, including the Emergency Response Team and CRA contractors, will be referred to as emergency response personnel.

5.1 **NOTIFICATION**

This section describes the notification stage of the emergency response, which consists of discovery, notification, identification and hazard assessment. The *Site Emergency Coordinator*, as well as CRA and ENCORE personnel, contact information is presented in Table 3.1. An internal emergency notification chart is presented in Figure 5.1, outlining immediate response notification activities. Outside local, state, and federal agency contact information is provided in Table 5.1. The Emergency Response Team's contact information (Inland Waters) is also presented in Table 5.1.

5.1.1 **DISCOVERY AND NOTIFICATION**

Any person (Site employees, CRA employees, CRA contractors) discovering a spill, fire or an imminent danger of explosion involving hazardous waste generated from environmental investigations and/or remedial activities that is not easily controllable with equipment and materials at hand should immediately notify Site security either in person or by telephone (**SECURITY PHONE NUMBER - (734) 482-5105**). Site security will be responsible for contacting the *Site Emergency Coordinator*. The *Site Emergency Coordinator* has the authority to commit the resources necessary to carry out the procedures necessary to notify, control and contain the incident (Sections 5.1 through 5.2) and does not require approval from CRA or ENCORE personnel to proceed with immediate emergency response measures.

The *Site Emergency Coordinator* will immediately respond to the incident and assess the situation. The *Site Emergency Coordinator* will contact CRA personnel (to aid in the incident), and if necessary, contact the Emergency Response Team (Inland Waters) to respond to the incident if Site or CRA personnel cannot control it. If the *Site Emergency Coordinator* determines that the incident could threaten human health and/or the environment outside the facility property, the *Site Emergency Coordinator* must immediately contact the following agencies:

- Ypsilanti Township Fire Department (**DIAL 911**);
- Washtenaw County Sheriff Department (**DIAL 911**); and
- If injuries have occurred from the incident, call for an ambulance (**DIAL 911**).

Directions to St. Joseph Mercy Hospital are provided in Appendix A.

CRA and/or ENCORE personnel, with the cooperation of the *Site Emergency Coordinator*, must determine if immediate notification to the following agencies is required (depending on applicable regulations):

Primary Contacts:

- Michigan Department of Environmental Quality (MDEQ) -
Pollution Emergency Alert System (PEAS)
Phone No.: (800) 292-4706 (**24-Hour Spill Line**)
- National Response Center (NRC) – If off-Site or reaches navigable waters
Phone No.: (800) 424-8802
- Washtenaw County Local Emergency Planning Commission (LEPC)
Phone No.: (734) 222-3800

Any reportable spills of an oil or hazardous waste that enter any type of sewer or waterway shall be reported as soon as possible to the:

- 1) MDEQ Pollution Emergency Alert System (PEAS);
- 2) NRC;
- 3) Washtenaw County LEPC; and
- 4) US Environmental Protection Agency (US EPA) - Region V.

Depending on the type of release (e.g. hazardous waste or PCB spill, fire, explosion), additional regulations may need to be adhered to and additional agencies may need to be notified. Refer to Attachment A for additional release notification requirements for the State of Michigan. Refer to Table 5.1 for additional agency contact information. Detailed information regarding external notification requirements (both verbal and written to regulatory agencies) are provided in Section 9.0, and will be the responsibility of CRA and ENCORE personnel.

5.1.2 IDENTIFICATION OF MATERIAL INVOLVED AND HAZARD ASSESSMENT

The *Site Emergency Coordinator*, with the aid of CRA and ENCORE personnel, will assess the situation by identifying the character, exact source, amount and extent of any released material. This can be done through visual observation of the material and its source of release; markings on containers; review of available records at the CRA Trailer; and communication with CRA or CRA contractors (if on-Site). The amount of material involved will be determined through a visual inspection of the area, combined with information on the capacities of containers affected.

Once the materials involved are identified, the *Site Emergency Coordinator*, with the aid of CRA and ENCORE personnel, will assess the possible threats to human health and/or the environment. In doing so, the *Site Emergency Coordinator* must consider both direct and indirect effects of the spill, fire, or explosion. These would include such effects as toxic, irritating, or asphyxiating gases/vapors generated, or the effects of materials transported off-Site by runoff from water or chemicals used to control fires or explosions. If the *Site Emergency Coordinator* determines that the incident requires evacuation of the facility, the *Site Emergency Coordinator* will invoke the Site's evacuation procedures (presented in Section 8.0).

5.2 CONTROL AND CONTAINMENT

This section describes the procedures to be implemented while attempting to control a spill, leak, or hazardous waste release or a fire or explosion. The *Site Emergency Coordinator*, with the aid of CRA and ENCORE personnel, and any emergency response personnel should respond to an emergency situation only to the extent that they do not compromise their own safety. If it is not possible for the emergency response personnel to respond, they should leave the area immediately and notify the appropriate response

agency (e.g., Ypsilanti Fire Department). In this case, the *Site Emergency Coordinator* and the emergency response personnel will only assist emergency responders as requested and will not attempt to direct the emergency responders.

5.2.1 EMERGENCY CONTROL PHASE

The *Site Emergency Coordinator*, with the aid of CRA and ENCORE personnel, will take all necessary measures to contain the hazard within the facility property, and to prevent its spread to other nearby properties, with the assistance of the Emergency Response Team (Inland Waters). The emergency control procedures used will generally depend on whether the incident involves a fire or explosion or a spill of hazardous wastes. Runoff from a fire may need to be treated as a spill. Similarly, some spills may involve flammable materials; in such cases, both procedures will need to be followed.

Spill, Leak, or Hazardous Waste Release

The initial response to any spill, leak, or hazardous waste release will be to protect human health and the environment. Emergency response activities will not be undertaken at the risk of injury to CRA personnel, CRA contractors, Site personnel or the Emergency Response Team. Emergency response personnel will strive for immediate identification and containment of any released material, when this can be done safely.

If liquid is leaking from a damaged drum, the Emergency Response Team will overpack the drum. In case of a spill of hazardous waste water from a frac tank, CRA and/or the Emergency Response Team will surround the tank with absorbent material. If a tank is ruptured, the Emergency Response Team will empty the tank.

If the spilled material could emit potentially toxic vapors, all personnel will be instructed to remain upwind of the spill. Only emergency response personnel who are properly trained and equipped with health and safety equipment will be permitted in the affected area.

During the response phase, emergency response personnel will be responsible for the following actions, wherever possible and necessary:

- Locating and controlling the source of the spill;
- Containing any spilled or released material using sand, dirt, or absorbent material; and

- Preventing contact between the spilled material and any incompatible materials.

Effort will be taken immediately to contain spilled liquid hazardous waste through the use of sand, dirt, or other inert absorbent material. If a large volume of liquid is spilled, a dirt dike or ditch will be constructed, if possible, to contain the material or to divert it to an area where it can be contained. Alternatively, absorbent materials will be used to contain the spilled liquid. Where possible, the ditch will be dug manually using the shovels located in the emergency spill kit (see Table 6.1 for equipment list). While the material is being contained, the source of the spill will be located and corrected, if possible.

If hazardous materials enter the storm sewer (all storm sewers go to various outfalls that lead to Tyler Pond), booms will be placed around the outfalls to contain those materials.

Fire or Explosion

In case of a fire or explosion, emergency response personnel are instructed that if the fire cannot be readily controlled with available equipment, the area must be immediately evacuated. The decision to evacuate the facility will be made by the *Site Emergency Coordinator*. The evacuation of the facility will be coordinated by the *Site Emergency Coordinator*, according to Site's evacuation procedures.

Only emergency response personnel who are properly trained and equipped with health and safety equipment will be permitted in the affected area. Should a non-emergency response trained employee discover an emergency situation (e.g., a fire), they would extinguish this fire only if they were reasonably sure that doing so would not result in bodily injury or property damage and that the fire was incipient in nature (e.g., a trash can fire). Personnel will strive for early containment of fires. However, fire fighting will not be done at the risk of injury to emergency response personnel.

Whenever possible, emergency response personnel will be responsible for the following activities, if necessary:

- Eliminating all sources of ignition or reaction;
- Controlling the source of the fire; and
- Containing any contaminated runoff from the facility using sand, dirt, or absorbent material.

If hazardous materials or runoff from firefighting (e.g., water or foam) enters the storm sewer (all storm sewers go to various outfalls that lead to Tyler Pond), booms will be placed around the outfalls to contain those materials.

5.3 FOLLOW-UP ACTIVITIES

The following section documents clean-up activities after a response to an emergency situation.

5.3.1 REMOVAL AND RECOVERY OR DISPOSAL OF MATERIALS

Immediately after an emergency incident, the CRA and ENCORE personnel will direct cleanup, removal, and disposal efforts. Contaminated soil and water, and any other material contaminated with hazardous waste will be appropriately disposed.

5.3.2 POST-CLEANUP ACTIVITIES

The CRA and ENCORE personnel, with the cooperation of the *Site Emergency Coordinator*, will ensure that cleanup and restoration have progressed to the level necessary to protect the health and safety of all personnel at the facility prior to resuming operations in the area affected by the emergency.

All emergency equipment used or damaged during the event must be cleaned, restored to its original condition, and fit for its intended use. Any equipment expended during the event or not restorable must be replaced. CRA and ENCORE personnel, in cooperation with the *Site Emergency Coordinator*, will also ensure that no waste that may be incompatible with the spilled hazardous waste is handled in the affected area until the spilled hazardous waste is cleaned up.

6.0 EMERGENCY EQUIPMENT

Emergency response equipment (e.g., fire extinguishing equipment, spill control equipment, and decontamination equipment) is stored at the CRA Site trailer, the Remediation Waste Storage Area, and the SAAs (see Figure 6.1 for locations). This equipment is to be used by emergency response personnel to protect human health and the environment in an emergency situation, but without endangering themselves. A summary of the available equipment and its intended use is provided in Table 6.1.

6.1 FIRE CONTROL EQUIPMENT

To provide rapid response to fires, a hand-held fire extinguisher is available in the CRA Site trailer. It should be noted that this fire extinguisher is only suitable for use in response to small fires.

6.2 SPILL CONTROL EQUIPMENT

An emergency spill kit, located at the Remediation Waste Storage Area, is equipped with a supply of spill absorbing booms, disposable bags, and eye wash bottles. The spill control equipment is suitable for containment and cleanup of small spills. Empty overpacks and drums are also located at the Remediation Waste Storage Area.

An additional emergency spill kit, located at the SAAs, is equipped with a supply of absorbing booms, disposable bags and eye wash bottles. The booms will be used to contain any spills that may discharge to Tyler Pond from this area.

Additional absorbent materials, pads, and booms will be stored in the CRA Trailer, as well as, decontamination equipment, shovels, and water for use as eyewash.

6.3 PERSONAL PROTECTIVE EQUIPMENT

Personal protective equipment, such as nitrile gloves, rubber boots, safety glasses etc., is stored in the CRA Site Trailer. CRA personnel are instructed to have respirators available and wear boots, tyvek suits, gloves, and safety glasses prior to responding to an emergency.

6.4 FIRST AID

A first aid kit is located in the CRA Trailer. The supplies are suitable for providing first aid for minor injuries only. For all other injuries or medical emergencies, immediately dial 911 for an ambulance and/or proceed immediately to St. Joseph Mercy Hospital for treatment.

7.0 COORDINATION AGREEMENTS

A contractual agreement is in-place with Inland Waters to provide emergency response on an as needed basis. Contact information is provided below and in Table 5.1.

Inland Waters
2021 S. Schaefer Highway
Detroit, Michigan 48217
313-841-5800

Tel: 1-800-992-9118 (24 hr.)
Fax: 1-313-841-5270

A copy of Inland Waters' emergency response procedures, once notified of an emergency, is presented in Appendix B.

8.0 EVACUATION PLAN

This section describes the evacuation plan. The evacuation plan is intended to facilitate the orderly and rapid evacuation of all environmental investigation and/or remedial activity areas, the Remediation Waste Storage Area, or the SAAs, thereby minimizing the threat of serious injury. The evacuation procedures should be adhered to as closely as possible; however, in an emergency situation, deviations or alternative procedures may be required to safely deal with the situation. This evacuation plan pertains to CRA and CRA's contractors only and does not include evacuation procedures for Site operator's personnel. In the event that a Site-wide evacuation is necessary, the Site operator's evacuation plan will be invoked by the *Site Emergency Coordinator*. The *Site Emergency Coordinator* is responsible for determining whether a facility-wide evacuation is necessary.

The following criteria, specific to CRA and CRA's contractors, will be used to determine the need to initiate evacuation procedures in the immediate vicinity of environmental investigation and/or remedial activity areas, Remediation Waste Storage Area, or SAAs:

- The nature of the emergency and types of hazardous waste involved;
- The threat to human health;
- The magnitude of the emergency; and
- The possibility of the hazard spreading to other areas of the facility.

In the event of a Site-wide evacuation, all CRA contractors must shut down all equipment and proceed to assembly point located at the southwest corner of Tyler Road and McGregor Road, as presented in Figure 8.1, to await instructions from the *Site Emergency Coordinator*. The *Site Emergency Coordinator* will be responsible for determining when the emergency situation has passed and for giving the verbal "All-Clear" signal.

If the evacuation involves only the environmental investigation and/or remedial activity areas, Remediation Waste Storage Area, or SAAs, all CRA personnel and CRA contractors must shut down all equipment and proceed to the nearest rally point. On-Site CRA personnel will inform Security of the rally point where CRA contractors have assembled (depends on what part of the Site they were working in). Security will contact the *Site Emergency Coordinator*, who with the aid of the CRA and ENCORE personnel, will be responsible for determining when the emergency situation has passed and for giving the verbal "All-Clear" signal.

Members of the Emergency Response Team (Inland Waters) will notify Security prior to arrival at the facility. Security will direct the Emergency Response Team to a designated area to meet with the *Site Emergency Coordinator* and CRA personnel.

In the event of a fire or release of toxic fumes, CRA personnel and CRA's contractors should pay close attention to the wind direction and remain upwind of the emergency location at all times. If necessary, the evacuation rally point will be relocated to stay upwind of the affected area.

This evacuation plan has been designed to facilitate an orderly evacuation of a small area of the facility. The plan cannot take into consideration all possible emergency situations. All personnel are instructed to use common sense when following the Evacuation Plan. If CRA personnel and/or CRA contractor personnel cannot safely reach the rally point, they should proceed to the nearest safe location and notify Security or the *Site Emergency Coordinator* as soon as possible.

9.0 NOTIFICATIONS AND REQUIRED REPORTS

This section provides detailed information regarding the notification and reporting requirements under the MDEQ and RCRA regulations.

9.1 NOTIFICATION REQUIREMENTS

If the *Site Emergency Coordinator*, with the aid of CRA and ENCORE personnel, determines that the Site has had a release, fire or explosion which could threaten human health or the environment outside the facility property, and the release, fire, or explosion is directly or indirectly associated with the environmental investigation or remedial activities, then CRA or ENCORE personnel must immediately contact the MDEQ PEAS, NRC, Washtenaw County LEPC, and/or the US EPA Region V (as specified in Section 5.1.1). If CRA is not on Site, the *Site Emergency Coordinator* will notify CRA and ENCORE personnel who in turn will immediately contact those listed above and specified in Section 5.1.1. The verbal report must include:

- Name and telephone number of the reporting individual;
- Name and address of the facility;
- Time and type of incident (e.g., release, fire);
- Type and quantity of material(s) involved, to the extent known;
- The extent of injuries, if any; and
- The possible hazards to human health or the environment outside the facility.

In addition to the verbal report, GM's internal "Environmental Spill/Release Tracking Form" must be completed and submitted to GM Worldwide Facilities Group. The form is presented in Appendix C.

9.2 REPORTING REQUIREMENTS

Before operations in the areas affected by the emergency situation may be resumed, CRA or ENCORE personnel must notify the US EPA, MDEQ, and the Washtenaw County LEPC that the facility is in compliance with 40 CFR 265.51 and R 299.9607 (i.e., no waste that may be incompatible with the released hazardous waste is treated, stored, or disposed of until cleanup procedures are completed; and all emergency equipment is cleaned and fit for its intended use).

The *Site Emergency Coordinator*, with the aid of CRA and ENCORE personnel, must note in the operating record the time, date and details of any incident that requires implementing this Contingency Plan. In addition, within 15 days after the incident, CRA and/or ENCORE personnel must submit a written report to the U.S. EPA Regional Administrator, and to the director of the MDEQ. The report must include:

- Name, address and telephone number of the facility, and the owner / operator;
- Date, time and type of incident (e.g., fire, explosion);
- Type and quantity of hazardous waste(s) involved;
- The extent of injuries, if any;
- An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- Estimated quantity and disposition of recovered material that resulted from the incident.

10.0 COORDINATION WITH OUTSIDE AGENCIES AND AMENDMENT OF CONTINGENCY PLAN

The following section outlines the outside agencies that have received a copy of the Contingency Plan to familiarize them with the facility.

10.1 COORDINATION WITH OUTSIDE AGENCIES

Copies of the contingency plan have been provided to emergency response agencies in order to familiarize them with the facility layout, the properties of the material handled, locations of the working areas, access routes into and within the facility, possible evacuation routes from the facility, and types of injuries or illness that could result from releases of materials at the facility. This information has been submitted to:

Ypsilanti Township Fire Department
222 South Ford Blvd.
Ypsilanti, MI 48198
Attn: Fire Marshall Phil Stachlewitz

Washtenaw County Sheriff Department
2201 Hogback Road
Ann Arbor, MI 48105

St. Joseph's Mercy Hospital
5301 E. Huron River Drive
Ypsilanti, MI 48197

Inland Waters
2021 S. Schaefer Highway
Detroit, Michigan 48217
313-841-5800
Tel: 1-800-992-9118 (24 hr.)
Fax: 1-313-841-5270

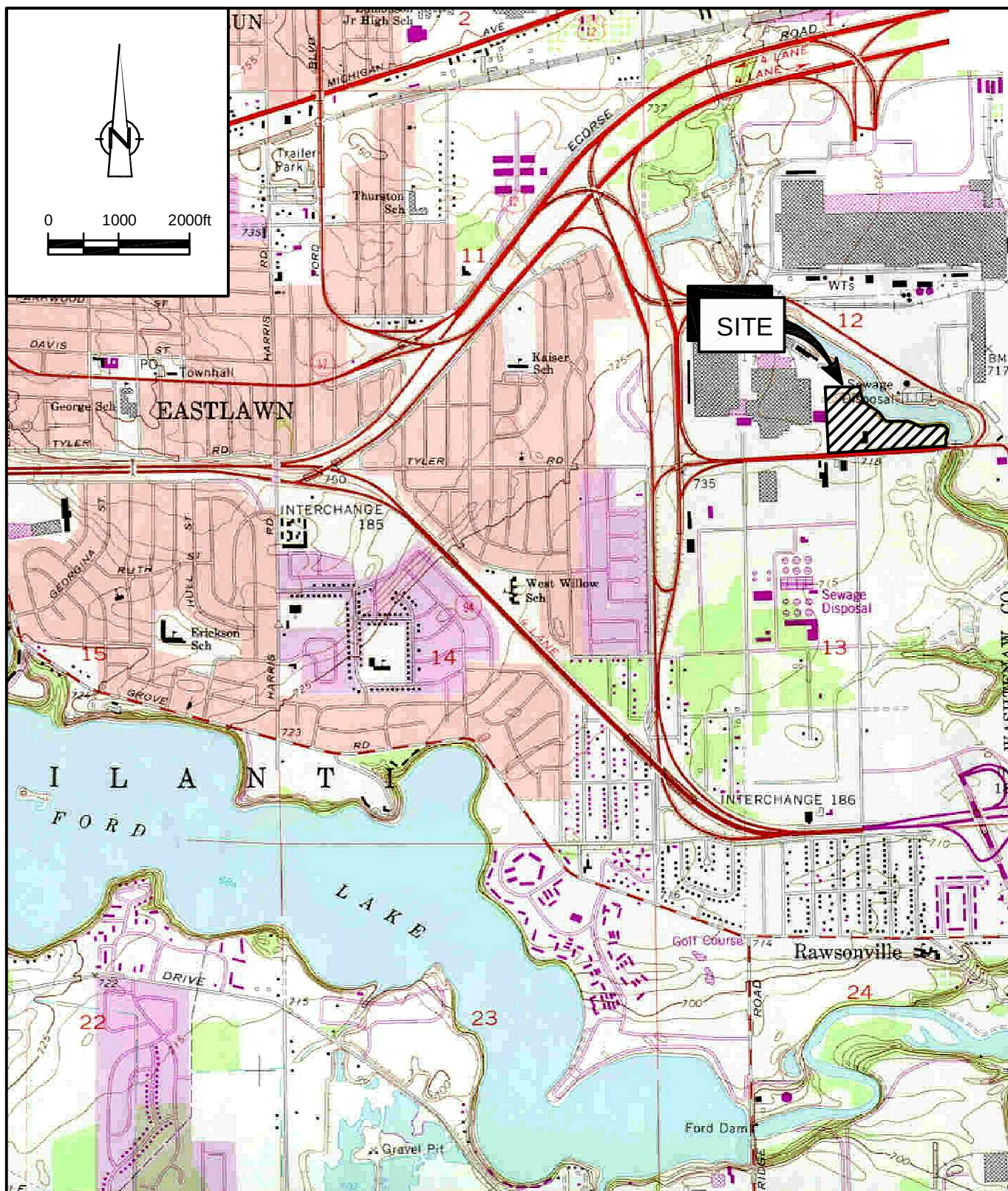
Attachment B includes documentation that each of these agencies was provided with a copy of this contingency plan. Documentation that each of these agencies has received a copy of this contingency plan will be kept on file at CRA. The above-noted organizations and agencies may be called upon in the event of an emergency and arrangements have been made to familiarize them with various aspects of the facility

relevant to emergency procedures. These would include the facility layout, properties of the hazardous waste associated with the environmental investigation and remedial activities, areas where personnel work, areas where hazardous wastes are stored, and the facility's entrances and evacuation routes.

10.2 AMENDMENT OF CONTINGENCY PLAN

CRA will review and amend this Contingency Plan whenever one of the following situations apply:

- After each time the Contingency Plan is implemented;
- Applicable regulations are revised;
- The Contingency Plan fails in an emergency;
- The facility changes in its design, construction, operation maintenance or other circumstances in a way that may increase the potential for spills, fires or explosions;
- The list of Emergency Coordinators changes; and
- The list of emergency equipment changes.

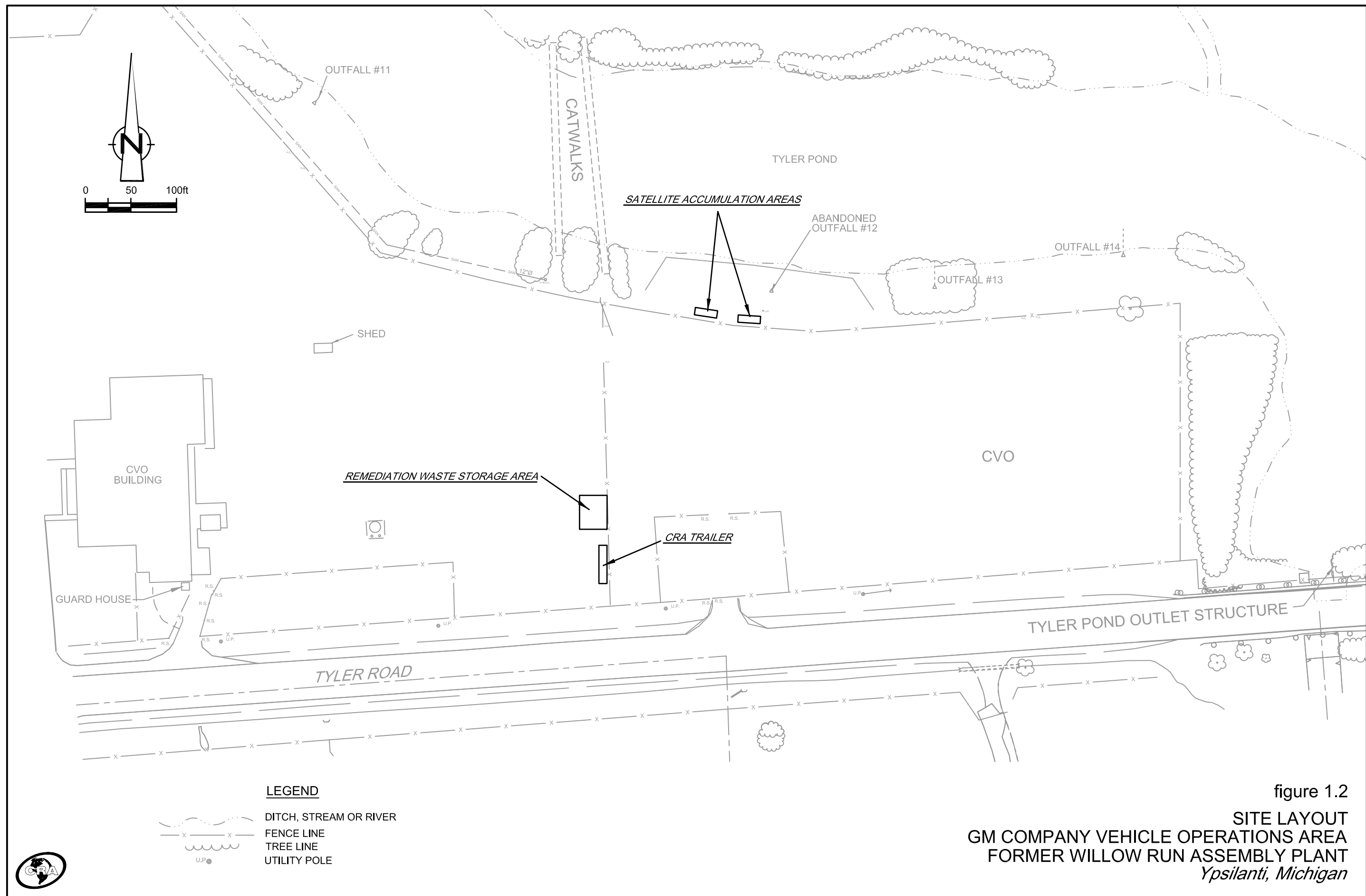


SOURCE: USGS QUADRANGLE MAP;
YPSILANTI EAST, MICHIGAN

figure 1.1

SITE LOCATION
GM COMPANY VEHICLE OPERATIONS AREA
FORMER WILLOW RUN ASSEMBLY PLANT
Ypsilanti, Michigan





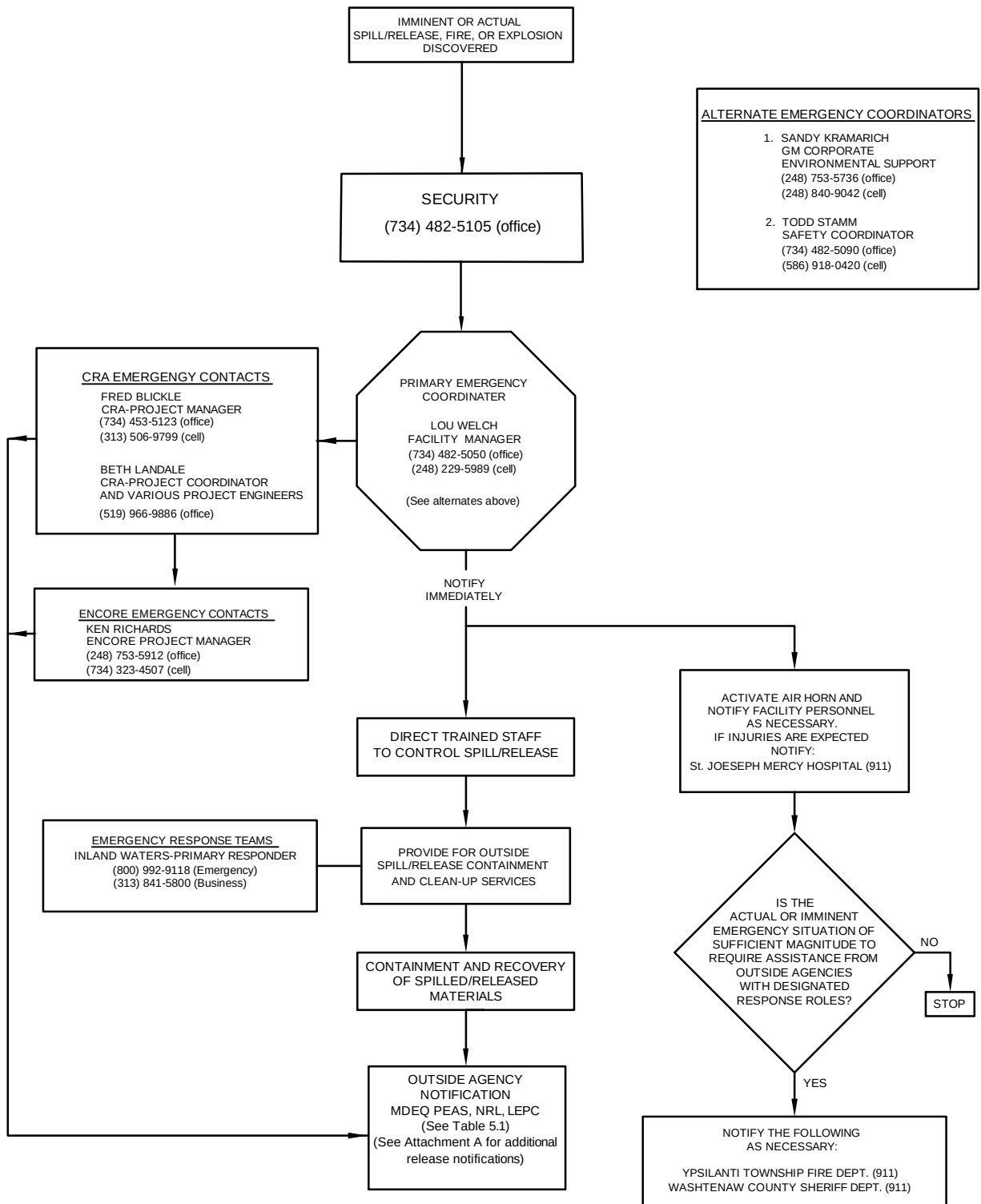
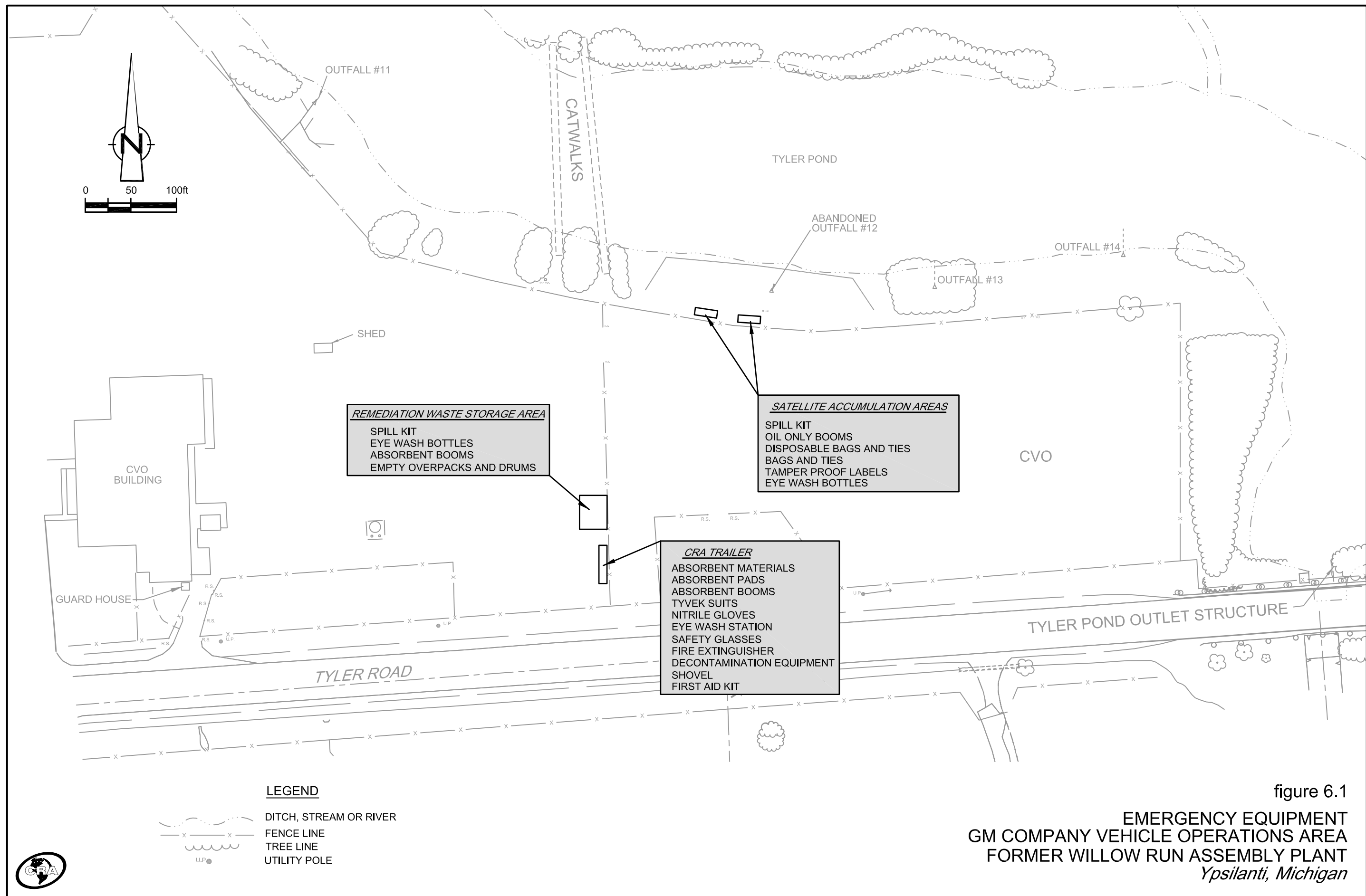


figure 5.1

INTERNAL EMERGENCY NOTIFICATIONS
GM COMPANY VEHICLE OPERATIONS
FORMER WILLOW RUN ASSEMBLY PLANT
Ypsilanti, Michigan



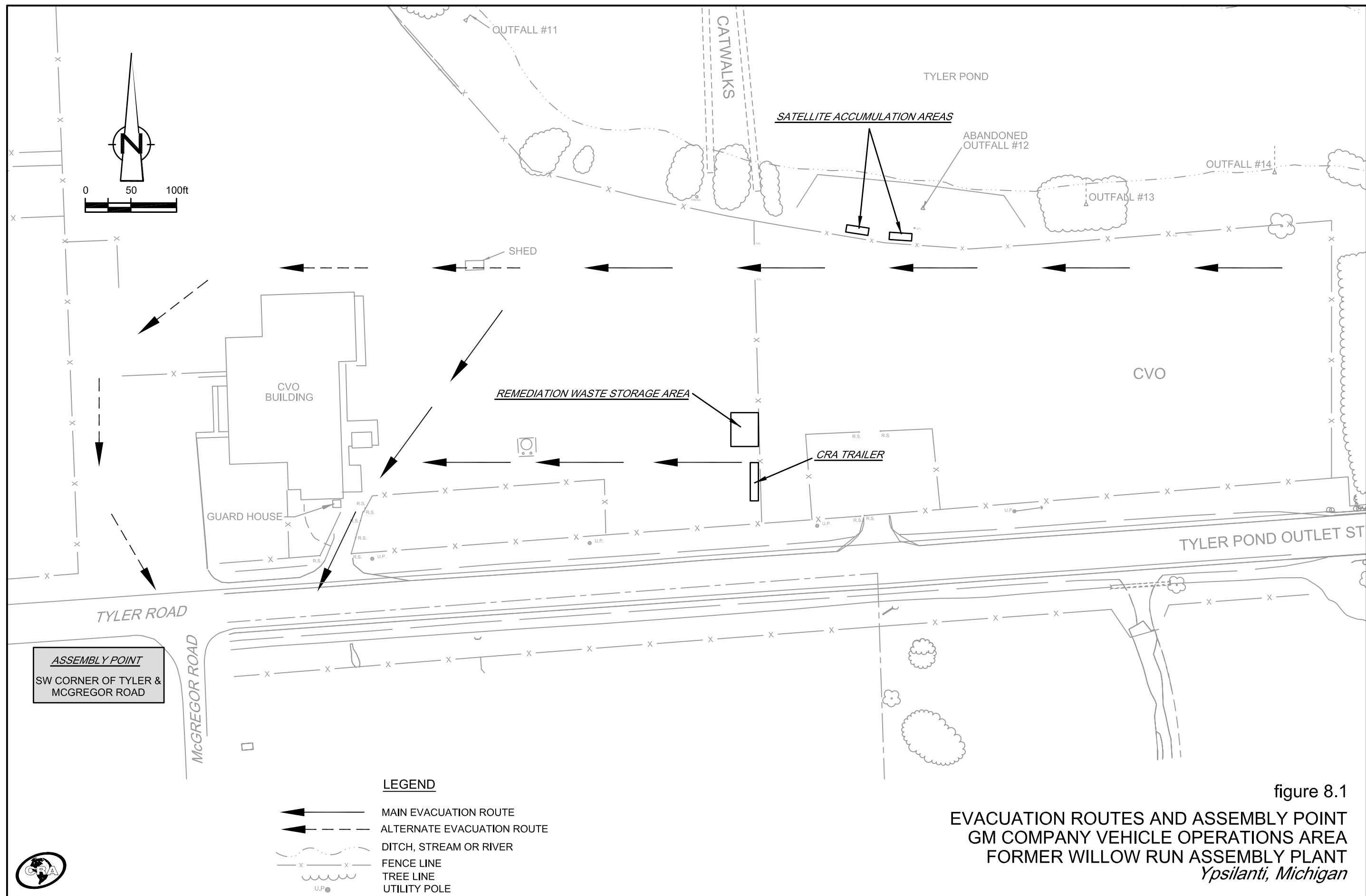


TABLE 3.1 Rev. 1

**EMERGENCY COORDINATORS
GM COMPANY VEHICLE OPERATIONS
FORMER WILLOW RUN ASSEMBLY PLANT
YPSILANTI, MICHIGAN**

SITE SECURITY (First Call)

Office: (734) 482-5105

Site Emergency Coordinators:

Primary Emergency Coordinator

Lou Welch	Office Address:	Home Address:	Office:	(734) 482-5005 (ext. 5050)
CVO Operations Manager	2901 Tyler Road	56291 Hastings Dr.	Direct:	(734) 482-5050
	Ypsilanti, MI 48198	Macomb, MI 48042	Cellular:	(248) 229-5989
			Home:	(586) 992-9692
			Fax:	(734) 482-5045
			Email:	lwelch@qek.com

Alternate Emergency Coordinator

Sandy Kramarich	Office Address:	Home Address:	Office:	(248) 840-9042
GM Corporate	GM - WFG Environmental Services	27157 Gateway Dr. W.	Cellular:	(248) 840-9042
Environmental Support	30240 Oak Creek Drive	Farmington Hills, MI 48334	Home:	(248) 471-3840
	P.O Box 1021		Fax:	(248) 668-2348
	Wixom, MI 48393		Email:	sandy.kramarich@gm.com
	Mail Code: 483-3WX-101			

Alternate Emergency Coordinator

Todd Stamm	Office Address:	Home Address:	Office:	(734) 482-5005 (ext. 5090)
Service Supervisor/	2901 Tyler Road	29870 Twelve Mile, #701	Direct:	(734) 482-5090
Safety Coordinator	Ypsilanti, MI 48198	Farmington Hills, MI 48334	Cellular:	(586) 918-0420
			Fax:	(734) 482-5045
			Email:	tstamm@qek.com

CRA Emergency Contacts:

Fred Blickle	Office: (734) 453-5123	Beth Landale	Office: (519) 966-9886
Project Manager	Cellular: (313) 506-9799	Project Coordinator	
		Various	Office: (519) 966-9886
		Project Engineers	

ENCORE Emergency Contacts:

Ken Richards	Office Address:	Office:	(586) 986-2208
Project Manager	GM WFG - Remediation Team,	Cellular:	(734) 323-4507
	30200 Mound Road		
	Warren, MI 48090		
	Mail Code: 480-111-W60		

TABLE 5.1

**LOCAL, STATE, AND FEDERAL EMERGENCY RESPONSE AGENCIES
AND SPILL RESPONSE CONTRACTOR INFORMATION
GM COMPANY VEHICLE OPERATIONS
FORMER WILLOW RUN ASSEMBLY PLANT
YPSILANTI, MICHIGAN**

<u>Local, State, and Federal Emergency Response Agency</u>		<u>Telephone Number</u>
Washtenaw County Sheriff Department 2201 Hogback Road Ann Arbor, MI 48105	Emergency: Business:	911 (734) 971-8400
Ypsilanti Township Fire Department Fire Marshall - Phil Stachlewitz 222 South Ford Blvd. Ypsilanti, MI 48198	Emergency: Business:	911 (734) 483-4225
St. Joseph Mercy Hospital 5301 E. Huron River Drive Ypsilanti, MI 48197	Emergency: Business:	911 (734) 712-3456
MDEQ Pollution Emergency Alert System (PEAS) (24-hour)		(800) 292-4706
MDEQ - Jackson District Office 301 E Louis Glick Hwy Jackson, MI 49201		(517) 780-7690
National Response Center - For release off-Site or to navigable waters		(800) 424-8802
EPA Region V - For TSCA related releases 77 West Jackson Blvd. Chicago, Illinois 60604	Toxic Program Section: Business:	(312) 886-6003 (312) 353-2000
Washtenaw County Local Emergency Planning Commission Washtenaw County Environmental Health 705 N. Zeeb Road, Box 8645 Ann Arbor, MI 48107		(734) 222-3800
<u>Spill Response Contractor(s)</u>		<u>Telephone Number</u>
Inland Waters 2021 S. Schaefer Highway Detroit, Michigan 48217 313-841-5800	Emergency: Business:	(800) 992-9118 (313) 841-5800

TABLE 6.1

**EMERGENCY EQUIPMENT LIST
GM COMPANY VEHICLE OPERATIONS
FORMER WILLOW RUN ASSEMBLY PLANT
YPSILANTI, MICHIGAN**

<i>Location</i>	<i>Item</i>	<i>Quantity</i>	<i>Description/Intended Use</i>
CRA Site Trailer	Nitrile Gloves	2 Boxes	first layer gloves
	Tyvek Coveralls	1 Box	protective clothing
	Safety Glasses	2 Pairs	eye protection
	Rubber Boots	1 Bag	footwear
	Duct Tape	2 Rolls	tape gloves to coveralls and coveralls to top of rubber boots
	5 lb Fire Extinguisher (ABC Dry Chemical)	1	extinguish small fires
	First Aid Kit	1	for basic first aid treatment (bandaids, antiseptic wipes, gauze, first aid tape, etc.)
	Shovels	1	spark-resistant shovels to be used to construct diversion trenches or collection areas to contain spilled liquids. Collect/contain released solid material. Spread absorbent material. Shovel absorbent material into drums.
	Absorbent Booms	1 Bag	to contain and absorb any spilled material in the pond
	Absorbent Material	1 Bag	clay-based material
	Absorbent Pads	1 Box	to absorb spilled material
Remediation Waste Storage Area	Spill Kit	1	equipment and other material stored in kit; used to contain spills (e.g., disposable bags & ties, tamper proof labels, eye wash bottles, absorbent booms, Emergency Response Guidebook Instructions Manual)
	Overpack Containers	2	for damaged drums or excavated drums
	UN-approved Drums (55 gallon open top)	1	for spilled material, or any other waste generated during incident response (e.g., absorbent pads, PPE, booms, etc.)
Satellite Accumulation Areas	Spill Kit	1	equipment and other material stored in kit; used to contain spills (e.g., disposable bags & ties, tamper proof labels, eye wash bottles, absorbent booms, Emergency Response Guidebook Instructions Manual)

APPENDIX A

DIRECTIONS TO ST. JOSEPH MERCY HOSPITAL

APPENDIX A

DIRECTIONS TO ST. JOSEPH MERCY HOSPITAL

Primary Route from GM Company Vehicle Operations

Start:

GM Company Vehicle Operations
2901 Tyler Rd
Ypsilanti, MI 48198-6126

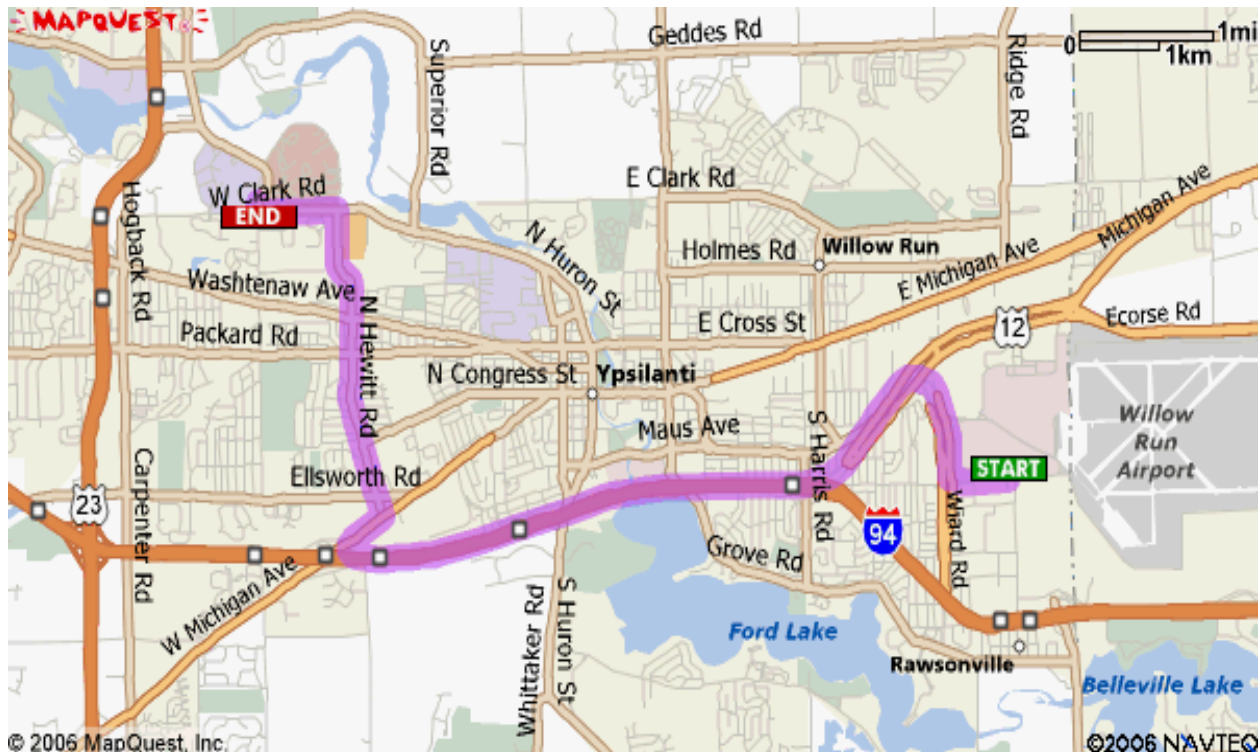
End:

St. Joseph Mercy Hospital
5301 E Huron River Dr
Ypsilanti, MI 48197

Emergency Phone Number: 911

Business Phone Number: (734) 712-3456

	Directions	Distance
1:	Proceed to the entrance, located at the south end of the facility	
2:	Start out going WEST on TYLER RD toward BOMBER AVE.	0.3 miles
3:	Take the WIARD RD ramp.	0.1 miles
4:	Turn RIGHT onto WIARD RD.	0.5 miles
5:	Merge onto US-12 W toward I-94 / ANN ARBOR.	1.0 miles
6:	Merge onto I-94 W / US-12 W.	3.5 miles
7:	Take the MICHIGAN AVE exit- EXIT 181B.	0.4 miles
8:	Merge onto W MICHIGAN AVE.	0.1 miles
9:	Turn LEFT onto S HEWITT RD.	2.2 miles
10:	Turn LEFT onto W CLARK RD.	0.5 miles
11:	Turn RIGHT onto E HURON RIVER DR.	<0.1 miles
12:	End at 5301 E Huron River Dr , Ypsilanti, MI 48197	
Total Est. Time: 13 minutes		Total Est. Distance: 9.06 miles

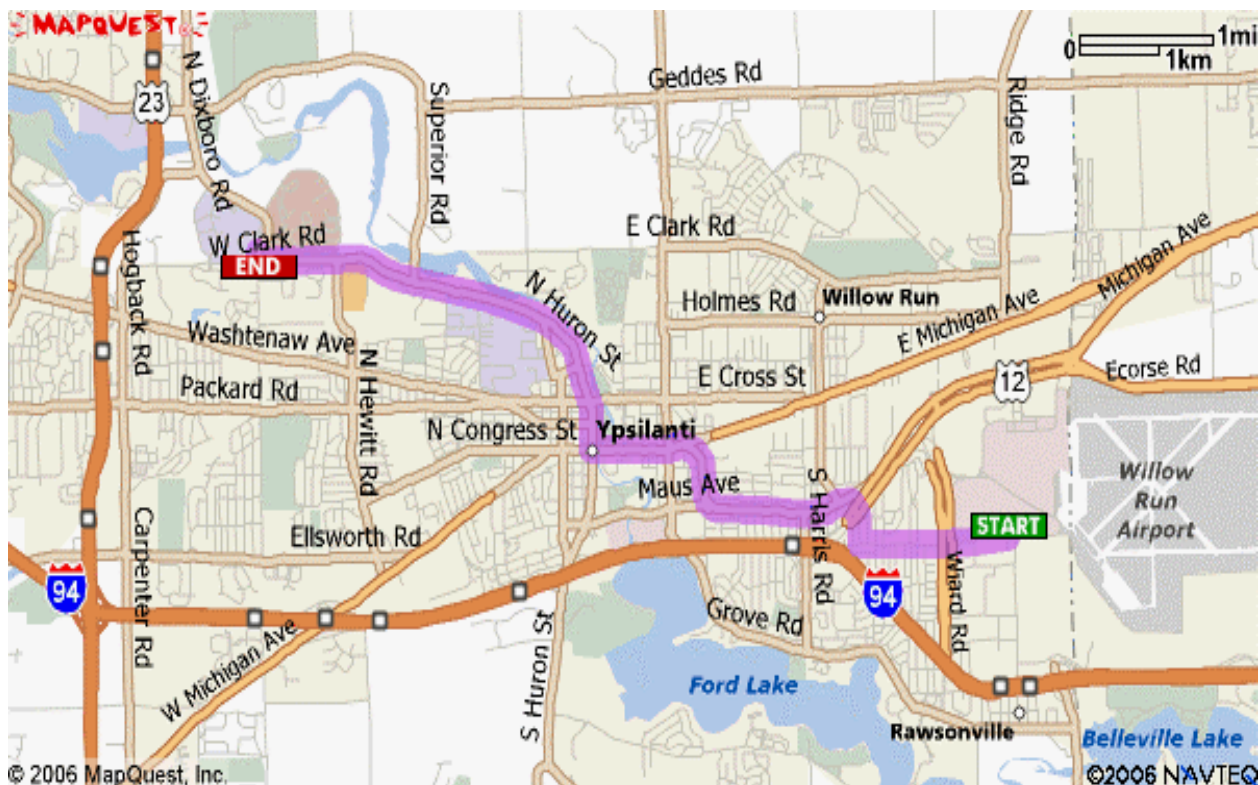


Alternate Route from GM Company Vehicle Operations

Start:
GM Company Vehicle Operations
2901 Tyler Rd
Ypsilanti, MI 48198-6126

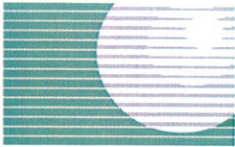
End:
St. Joseph Mercy Hospital
5301 E Huron River Dr
Ypsilanti, MI 48197
Emergency Phone Number: 911
Business Phone Number: (734) 712-3456

	Directions	Distance
1:	Proceed to the entrance, located at the south end of the facility	
2:	Start out going WEST on TYLER RD toward BOMBER AVE.	1.1 miles
3:	Turn RIGHT onto DORSET AVE.	0.2 miles
4:	DORSET AVE becomes LAVERNE ST.	0.1 miles
5:	Turn SLIGHT LEFT onto ECORSE RD / MI-17.	2.1 miles
6:	Continue to follow MI-17.	
7:	Turn RIGHT onto N HURON ST / MI-17 W.	0.3 miles
8:	Keep RIGHT at the fork to go on N HURON ST.	0.9 miles
9:	N HURON ST becomes N HURON RIVER DR.	1.2 miles
10:	N HURON RIVER DR becomes W CLARK RD.	0.5 miles
11:	Turn RIGHT onto E HURON RIVER DR.	<0.1 miles
11:	End at 5301 E Huron River Dr , Ypsilanti, MI 48197	
Total Est. Time: 19 minutes		Total Est. Distance: 6.87 miles



APPENDIX B

INLAND WATERS EMERGENCY RESPONSE PROCEDURES



**INLAND WATERS
POLLUTION
CONTROL, INC.**

*Sent Via Email
blandale@craworld.com*

May 21, 2007

Ms. Beth Landale
CONESTOGA-ROVERS & ASSOCIATES
1880 Assumption Street, Unit 200
Windsor, Ontario
Canada N8Y 1C4

Re: SPCC

Dear Ms. Landale:

As your spill response provider, Inland Waters Pollution Control, Inc. (IWPC) will follow the course of action outlined below:

1. Call received at 800-992-9118 or 313-841-5800, ext. 231 (24 hours a day/7 days a week/365 days per year).
2. Dispatcher requests information (type of spill, location, caller name and phone number, etc.).
3. Dispatcher calls on-call Incident Commander and relays information.
4. Incident Commander returns call to customer within 5 to 10 minutes.
5. Incident Commander gathers additional information and provides customer with his cell phone number.
6. Incident Commander and customer agree on equipment and manpower needed to respond to the spill.
7. Incident Commander activates the emergency response team and departs for scene.

If you have any questions or require additional information, please call me at 313-995-3561 or 313-841-5800, ext. 281.

Sincerely,

INLAND WATERS POLLUTION CONTROL, INC.

Rob Hought
ER Manager

APPENDIX C

GM ENVIRONMENTAL SPILL/RELEASE TRACKING FORM

GM Environmental Spill/Release Tracking Form

PRIVILEGED AND CONFIDENTIAL
ATTORNEY CLIENT COMMUNICATION

WFG Region:	Division:
Plant Name:	Plant Address:
Reported to the agencies by:	Report Date/Time:
Title:	Phone Number:
Plant Response Personnel Contacted:	Form Submitted by:

Incident Description

Date of incident: Time: am/pm: Released during Production hours:

Location of Incident (be specific) Bldg (#, name): Floor: Bay/Dock #:

Released offsite (be specific):

Was the release to: Land ☐ Air ☐ Water ☐

Material: HMCS ID#: WC# (Canada only):

Duration of Release (minutes, hours, days, etc): Total amount spilled/released:

How was the release discovered?

Boxed Area to be completed by U.S. Facilities

RQ Substance: CAS #: # of RQ substance released: Exceeded RQ? Yes ☐ No ☐

Was the release from a permitted source? Yes ☐ No ☐ Exceed permit: Yes ☐ No ☐ Exceed permit by RQ? Yes ☐ No ☐

US EPA ID #:

Receiving body of water (stream, river, watershed, etc.):

Describe the event (include equipment and other details):

Describe Weather Conditions (precipitation, wind, temp, etc):

Spill/Release reached (check all that apply):

- | | | | | | |
|------------------------------------|-----------------------------|--------------------------------|--|-----------------------------|--------------------------------|
| 1) Storm Sewer | GM ☐ | NonGM ☐ | 2) Surface Water | GM ☐ | NonGM ☐ |
| 3) Sanitary Sewer | GM ☐ | NonGM ☐ | 4) Combined Sewer | GM ☐ | NonGM ☐ |
| 5) Publicly Owned Treatment Works: | ☐ | | 6) Groundwater | ☐ | |
| 7) Soil | ☐ | | 8) Industrial Wastewater Treatment Plant | ☐ | |
| 9) Ambient Air: | ☐ | | 10) Other: | | |

Bold Items –Required Information for Agency Reports
Supplement this report as new information arises.

GM Environmental Spill/Release Tracking Form

PRIVILEGED AND CONFIDENTIAL
ATTORNEY CLIENT COMMUNICATION

Page 2

Action Taken

Material was contained (yes/no): _____ | Amount of material contained (gallons, pounds, or % of release): _____

Describe containment/Clean-up procedures taken:

Amount of material lost (gallons, pounds, or % of release): _____

Was the material exposed to stormwater? _____ If Yes, Duration of exposure (hours): _____

Was the material disposed? _____ Approved Licensed Disposal Facility: _____

Total number of injuries: _____ Known health effects of material: _____

Describe any Corrective Action taken to prevent recurrence of the release:

IMMEDIATE NOTIFICATION LOG

Was the release reported for information purposes only – NO RQ EXCEEDED?:

Agency Notified Contact Person Phone # Date and Time(am/pm) Report Number

GM Notification

Department Notified Contact Person Phone # Date &Time (am/pm) Other

Plant Manager				
GM Legal				
Regional Office				
Plant Communications				
Div. Communications				

Bold Items –Required Information for Agency Reports
Supplement this report as new information arises.

GM Environmental Spill/Release Tracking Form

PRIVILEGED AND CONFIDENTIAL
ATTORNEY CLIENT COMMUNICATION

Page 3

Plan Review (SWP3, SPCC, ICP, PIPP, Emergency Response)

Procedure(s) reviewed by:		Date:
---------------------------	--	-------

Procedures Reviewed:	SWP3 ☐	SPCC ☐	PIPP ☐	ICP ☐	Emergency Response ☐
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Updates Needed:

SWP3:	☐ Yes ☐ No	Revision:
SPCC:	☐ Yes ☐ No	Revision:
PIPP:	☐ Yes ☐ No	Revision:
ICP:	☐ Yes ☐ No	Revision:
Emergency Response:	☐ Yes ☐ No	Revision:

Plants: Fax Completed Form to your Regional Manager
Regional Managers: Fax Completed Form to Chemical Risk Mgmt. @ 248-753-5829
and appropriate Legal Staff Representative

Bold Items –Required Information for Agency Reports
Supplement this report as new information arises.

ATTACHMENT A

RELEASE NOTIFICATION REQUIREMENTS IN MICHIGAN

Release Notification Requirements in Michigan

November 20, 2006

Chemical releases in Michigan are potentially reportable under one *or more* of twenty-seven different **state and federal regulations**. Determining which regulations apply to a specific release can be an overwhelming task. The “Release Notification Requirements in Michigan” table was compiled by Michigan SARA Title III Program in the Michigan Department of Environmental Quality (DEQ) to help owners and operators of facilities in Michigan, including vehicles and farms, determine their potential notification and reporting requirements in the event of a chemical release.

Check your permits, licenses, registrations, pollution prevention plans, and local ordinances for *additional* release reporting requirements. In particular, all NPDES permits and most air permits have release reporting requirements in them that are not included on this table.

The term “**release**” means spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing. “**Chemical**” includes substances considered to be toxic or hazardous as well as substances as seemingly harmless as salad oil. The notification requirements almost always include immediate initial notification. The EPA interprets “immediate” to mean that the notification must be made within 15 minutes after discovery of the release. This table should therefore be used as a tool to identify potential reporting requirements *before* a release occurs. The table outlines **what** releases must be reported, **when** they must be reported, and **to whom** they must be reported.

Links to the release reporting forms and chemical lists referenced in the table are available at www.michigan.gov/degrelease. Visit this site for updated versions of this table, as well as updated DEQ and LEPC contact information. For information regarding a specific regulation, contact the agency specified in the “notes” column of the table. If this is a DEQ division, contact the *district* division office.

The EPA published a consolidated list of chemicals subject to SARA Title III and Section 112(r) of the Clean Air Act. This document is called the “List of Lists” and is available through the DEQ’s Release Reporting web site in three formats: as a pdf file updated October 2001, as a searchable database updated January 27, 2005, and in an Excel file updated January 27, 2005. The changes that have occurred since October 2001 are listed in the document that precedes the List of Lists in this guidebook. The “List of Lists” includes:

- CERCLA Hazardous substances with reportable quantities (RQ) for releases – 40 CFR 302, Table 302.4.
- SARA Title III Section 304 Extremely Hazardous Substances (EHS) with RQs for releases – 40 CFR 355, Appendix A.
- SARA Title III Section 313 Toxic chemicals – 40 CFR 372 Subpart D.

Written follow-up report forms that are specified in the table are required by regulation. The DEQ has developed a generic written report form called “Spill or Release Report” (EQP 3465) that can be used to report releases of:

- CERCLA hazardous substances and extremely hazardous substances under SARA Title III,
- Hazardous waste under NREPA Part 111,
- Liquid industrial waste under NREPA Part 121,

- Hazardous substances under NREPA Part 201, and
- Polluting materials under NREPA Part 31, Part 5 Rules.

It is recommended that you also use this generic report form to record initial notifications.

After reviewing the table, you will see that if you have a release, determining if, when, and to whom a release should be reported can be a complex task even if you are familiar with the table. It is therefore recommended that **if there is a release, immediately call** the following numbers even if the content or quantity of the released material has not yet been determined:

- | |
|--|
| <ol style="list-style-type: none">1. 911 to notify Local authorities2. 800-292-4706 (PEAS) to notify State authorities3. 800-424-8802 (NRC) to notify Federal authorities |
|--|

You can then respond to the release, reassess the situation, and make additional notifications as required (e.g. as specified in the table or in your permits). Remember that there is NO PENALTY FOR OVER-REPORTING! Your follow-up report will provide details that explain why a release was or was not reportable.

General questions or comments regarding this table should be directed to the Michigan SARA Title III Program at 517-373-8481 or deg-ead-sara@michigan.gov.

DEQ program information is available at www.michigan.gov/deg, or phone the DEQ Environmental Assistance Center at 800-662-9278.

Acronyms used in the table are defined at the end of the table.

While diligent efforts have been made to assure that the information provided in this table is accurate and complete as of November 20, 2006, there is no guarantee that it covers all of the regulatory requirements for release notification and reporting in Michigan.

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
SARA Title III Section 304 40 CFR 355.40 (EHS & Hazardous Substances)	Release of a CERCLA hazardous substance (40 CFR 302, Table 302.4) or Extremely Hazardous Substance (EHS) (40 CFR 355, Appendix A) from a facility (including motor vehicles, rolling stock, and aircraft) in a quantity equal to or greater than its corresponding reportable quantity in any 24-hr period that migrates beyond the facility boundaries. Includes continuous release reportable under CERCLA Section 103. Excludes release that is federally permitted or that results in exposure to persons solely within the boundaries of the facility. See 67 FR 18899 (4/17/02) for guidance on the CERCLA federally permitted release definition for certain air emissions. See 71 FR 58525 (10/4/06); Exemption for < 1000 lbs of NOx released to the air from combustion or combustion-related activities. 12/27/04 phosmet was removed from the EHS list.	Immediate (within 15 minutes after discovery): to LEPC(s) of any area(s) potentially affected, and SERC (DEQ PEAS line accepts notification on behalf of SERC) by owner or operator. Continuous releases must be identified as such and are reported initially and when there is a significant change in the release. Transportation related releases can be reported to 911.	As soon as practicable (within 7 days) after release: to LEPC(s) and SERC. For continuous releases: Initial written within 30 days after initial telephone notification & Follow-up within 30 days of first anniversary of initial written notification: to LEPC(s) and SERC. Michigan SARA Title III Program accepts reports on behalf of the SERC.	PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) Contact your LEPC for a phone number to report releases. Call 911 if your LEPC is not active. For further information contact Michigan SARA Title III Program 517-373-8481
CERCLA Section 103 40 CFR 302 (Hazardous Substances)	Release into the environment of a CERCLA hazardous substance (40 CFR 302, Table 302.4) or hazardous constituent in a mixture or solution (including hazardous waste streams) from a vessel or facility (including transport vehicles and aircraft) in a quantity equal to or greater than its corresponding reportable quantity in any 24-hour period. See 40 CFR 302.6 for notification requirements for radionuclide releases. Includes continuous release: occurs without interruption or abatement or that is routine, anticipated, and intermittent and incidental to normal operations or treatment processes. Excludes release that is federally permitted. See 67 FR 18899 (4/17/02) for guidance on the CERCLA federally permitted release definition for certain air emissions. See 71 FR 58525 (10/4/06) re Exemption for NOx releases to the air of < 1000 lbs from combustion or combustion-related activities.	Immediate (within 15 minutes after discovery): to NRC by person in charge of vessel or offshore or onshore facility. Continuous releases must be identified as such and are reported initially and when there is a significant change in the release.	For continuous releases only: Initial written within 30 days after initial telephone notification & Follow-up within 30 days of first anniversary of initial written notification: to EPA Region 5.	U.S. Coast Guard National Response Center (NRC) 800-424-8802 For further information contact Michigan SARA Title III Program 517-373-8481 or EPA's RCRA, Superfund & EPCRA Call Center 800-424-9346
NREPA 1994 PA 451 Part 201, Environmental Remediation	Unpermitted release into the environment over a 24-hour period of a hazardous substance (<u>2001 version</u> of the CERCLA list, 40 CFR 302, Table 302.4) in a quantity equal to or greater than its corresponding reportable quantity. Does not include release solely from UST systems regulated under Part 213, and release solely from disposal area licensed under Part 115 and discovered through disposal area's hydrogeological monitoring plan. Release of substance regulated by MI Dept of Agriculture (MDA) (fertilizer, soil conditioner, or pesticide) excluding normal agricultural practices: <i>also</i> report to MDA.	Within 24 hours after discovery: to DEQ-RRD district office (PEAS after hours) by owner, operator or person holding easement interest. Report agricultural release to MDA.	Upon request: to DEQ-RRD district supervisor. Specific forms required for: "Notice Regarding Discarded or Abandoned Containers" (Form EQP4476) and "Notice of Migration of Contamination" (Form EQP4482).	PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) MDA Agriculture Pollution Emergency Hotline: 800-405-0101 (from within MI) or 517-373-0440 (from outside MI) For further information contact DEQ-RRD

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations.**

Additional reporting requirements might be found in **permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
NREPA 1994 PA 451 Part 83, Pesticide Control Regulation 640, Commercial Pesticide Bulk Storage (Agricultural)	Release to the environment of a commercial pesticide >5 gallons liquid or 100 pounds dry. The term “release” excludes normal agricultural practices. The regulation specifies that a pesticide release reportable under SARA Title III shall be reported to PEAS and the NRC.	Immediate: to PEAS* Also notify NRC for reportable spills as defined by SARA Title III & CERCLA. *MDA prefers direct notification to their hotline. PEAS forwards all agriculture calls to MDA.	Within 90 days: to MDA Environmental Stewardship Div. a revised site plan.	MDA Agriculture Pollution Emergency Hotline: 800-405-0101 (from within MI) or 517-373-0440 (from outside MI) PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) NRC 800-424-8802 For further information contact MDA 517-373-1087
NREPA 1994 PA 451 Part 85, Fertilizers Regulation 641 Commercial Fertilizer Bulk Storage Regulation 642, On Farm Fertilizer Bulk Storage (Agricultural)	Release to the environment of a commercial fertilizer >55 gallons liquid or 650 pounds dry; or an on farm fertilizer > 55 gallons liquid. The term “release” excludes normal agricultural practices. The term “liquid fertilizer” excludes anhydrous ammonia.	Immediate: to MDA by commercial bulk storage facility personnel (For farms, the regulation does not specify who makes the report.)	Not required.	MDA Agriculture Pollution Emergency Hotline: 800-405-0101 (from within MI) or 517-373-0440 (from outside MI) For further information contact MDA 517-373-1087
Fire Prevention Code 1941 PA 207 Section 29.5g	A fire, explosion, spill, leak, accident, or related occurrence that involves the transportation, storage, handling, sale, use, or processing of hazardous material by a firm, person, or vehicle. Hazardous material = explosives, pyrotechnics, flammable gas, flammable compressed gas, flammable liquid, nonflammable compressed gas, combustible liquid, oxidizing material, poisonous gas or liquid, LPG, or irritating, etiologic, radioactive, or corrosive material. Per EO 2003-18, DLEG Bureau of Construction Codes and Fire Safety will receive reports previously sent to the State Fire Marshall.	Immediately following incident, report known details regarding incident: to DLEG Bureau of Construction Codes and Fire Safety <i>and</i> organized local fire department by owner of firm or vehicle or the person <i>and</i> the chief of first police or organized fire dept upon scene of incident.	Not required.	Contact DLEG Bureau of Construction Codes and Fire Safety: 24-hr voice mail – 517-322-5316 24-hr pager – 888-237-4081 For further information: contact local fire department
Fire Prevention Code 1941 PA 207 Part 2 of Storage and Handling of Flammable and Combustible Liquids rules (FL/CL code)	A release from an AST system of >55 gal of any flammable or combustible liquid (flash point <200 degrees Fahrenheit) to the ground or within a secondary containment area during any 24 hour period.	As soon as practicable after detection of release: to PEAS by owner or operator.	Within 10 days after release: to DEQ (WHMD, Storage Tank Unit) outlining cause, discovery, response to prevent recurrence.	PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) For further information: contact DEQ-WHMD Storage Tank Unit

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*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations.**
Additional reporting requirements might be found in **permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
49 CFR 171 (Transportation of Hazardous Materials)	Initial verbal notice: Incident during transportation (including loading, unloading, temporary storage) involving (1) hazardous material and resulting in death, injury requiring hospitalization, public evacuation $\geq$ 1 hour, major transportation artery or facility closure $\geq$ 1 hour, or flight pattern alteration; (2) fire, breakage, spillage, or suspected contamination involving radioactive material or infectious substances; (3) marine pollutant exceeding 450 L (119 gal) liquid or 400 kg (882 lbs) solid; (4) other per judgment of person in possession of the hazardous material (e.g., continuing danger to life exists at scene of incident). Hazardous material = CERCLA hazardous substance (40 CFR 302, Table 302.4), hazardous waste (40 CFR 262), marine pollutant (49 CFR 172.101 Appendix B), elevated temperature material, listed on Hazardous Materials Table (49 CFR 172.101), or meets criteria for hazard class/division in 49 CFR 173. Written follow-up report: Required for all of above, plus any unintentional release of hazardous material from a package (including tank); or any quantity of hazardous waste discharged during transportation; or structural damage to lading retention system, even if no release, on specification cargo tank with $\geq$ 1000 gal capacity containing hazardous material; or undeclared hazardous material discovered.	As soon as practical but no later than 12 hours after occurrence of the incident: to NRC by each person in physical possession of the hazardous material. For infectious substances, notice may be given to the Director, Centers for Disease Control and Prevention, U.S. Public Health Service instead of NRC.	Within 30 days after discovery: to US DOT on DOT Form F 5800.1 (01-2004) “Hazardous Materials Incident Report.” Report must be updated w/i 1 year of incident if: Death results from injury; hazardous material or package info on prior report misidentified; damage, loss or cost not known on prior report becomes known or changes by \$25,000 or 10%. See regulation for exceptions to written report.	NRC 800-424-8802 U.S. Public Health Service 800-232-0124 For further information contact US DOT Hazardous Materials Information Center at 800-467-4922 or online at http://hazmat.dot.gov
NREPA 1994 PA 451 Part 31, Water Resources Protection (Release to surface of ground, surface water, groundwater or public sewer system)	Unpermitted release directly or indirectly to public sewer system, surface of ground, surface water or groundwater from an oil storage facility or on-land facility of a “polluting material” (oil, salt, or any material specified in table 1 in R 324.2009) in excess of its threshold reporting quantity during any 24-hour period. See Part 5 rules, effective 8/31/01, for details and exemptions. HB 5586 effective 6/15/04 amended the reporting requirements.	As soon as practicable after detection: to PEAS and 911 by owner, operator or manager. State agencies call 911 if release reported to them by another state or Canada.	Within 10 days after release: to DEQ-WB district supervisor <i>and</i> to the local health department where the release occurred, outlining cause, discovery, response & prevention of recurrence.	PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) For further information contact DEQ-WB-FOD
CWA Section 311 33 CFR 153 (Navigable waters – Coast Guard/DOT) Control of Pollution by Oil and Hazardous Substances, Discharge Removal	Discharge of a harmful quantity of oil or a hazardous substance from a vessel or onshore or offshore facility into or upon navigable waters of the United States or adjoining shorelines. Harmful quantity = oil discharge that violates applicable water quality standards, or causes a film or sheen upon or discoloration of the surface of the water or adjoining shorelines, or causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines; or a CERCLA hazardous substance (40 CFR 302, Table 302.4) in a quantity equal to or greater than its corresponding reportable quantity. Oil = oil of any kind or in any form including petroleum, crude oil, petroleum refined products, sludge, oil refuse, oil mixed with wastes, etc., as well as vegetable and animal oils.	Immediate: to NRC by person in charge of vessel or facility. If direct reporting to NRC not practicable, may report to district Coast Guard or EPA predesignated On-Scene Coordinator (OSC).	Not required.	NRC 800-424-8802 District 9 Coast Guard 216-902-6117 EPA Region 5 for predesignated OSC 312-353-2318 For further information contact EPA Region 5 at 312-353-8200 or District 9 Coast Guard at 216-902-6054

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Additional reporting requirements might be found in **permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
CWA Section 311 40 CFR 110 (Discharge of Oil)	Discharges of oil that violate applicable water quality standards, or cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines , or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines. Oil = oil of any kind or in any form including petroleum, crude oil, petroleum refined products, sludge, oil refuse, oil mixed with wastes, etc., as well as vegetable and animal oils.	Immediate: to NRC by person in charge of vessel or facility.	Not required.	NRC 800-424-8802 For further information contact DEQ-WB-FOD
NREPA 1994 PA 451 Part 615, Supervisor of Wells (oil and gas production fields)	A loss, spill or release of (1) any amount of brine, crude oil, or oil or gas field waste <i>unless</i> it is less than 42 gallons and occurs while an authorized representative is on site and is completely contained and cleaned up within 1 hour, or (2) any unpermitted amount of natural gas , or (3) chemicals used in association with oil and gas activities.	Within 8 hours after discovery of: 42 gallons or more of brine, crude oil, or oil or gas field waste, or any amount of chemical or natural gas, or; less than 42 gallons if the spill contacts surface water, groundwater, or other environmentally sensitive resources, or is not completely contained and cleaned up within 48 hours: to DEQ-OGS district office (PEAS after hours) by permittee.	Within 10 days after discovery of loss or spill: to DEQ-OGS district supervisor on Form EQP-7233 (Rev 03/99) "Report of Loss or Spill." Written report only for less than 42 gallons of brine, crude oil, or oil and gas field waste if spill does not contact surface water, groundwater, or other environmentally sensitive resources, and is completely contained and cleaned up within 48 hours.	PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) For further information contact DEQ-OGS
NREPA 1994 PA 451 Part 211, Underground Storage Tanks Part 213, Leaking Underground Storage Tanks	Releases of a regulated substance of any amount from underground storage tank (UST) systems (includes the emergency shutoff valve on down) subject to registration; overfill from UST fillpipe or vent onto ground; release from aboveground pipe attached to UST system. Regulated substance = petroleum or CERCLA hazardous substance (40 CFR 302, Table 302.4) or substance listed in CAA title 1 part A sect 112. Petroleum includes, but is not limited to, crude oil, motor fuels, jet fuels, distillate fuel oils, residual fuel oils, lubricants, and petroleum solvents.	Within 24 hours after discovery (Part 211) - Includes releases discovered years after UST system removed: to DEQ-WHMD central or district office, or PEAS, or via web or fax on Form EQP 3826 (Release Report-rev. 11/2005). If free product, Form EQP 3800 (Rev 02/2003) required by UST owner or operator, or employee of owner or operator.	At 90 days on Form EQP3841 if not closed, and at 365 days on Form EQP3842 if still not closed, and at closure on Form EQP3843 (all forms Rev. 02/2003), describing response action (Part 213): to DEQ-RRD district project manager.	PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) On-line reporting go to DEQ Release reporting web site, select "release reporting forms" then EQP 3826. Fax for UST release: 517-335-2245 For further information contact DEQ-WHMD or DEQ-RRD

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Additional reporting requirements might be found in **permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
NREPA 1994 PA 451 Part 111, Hazardous Waste Management (Generators; Treatment, Storage & Disposal Facilities (TSDF); Transporters)	Any amount of characteristic hazardous waste or listed hazardous waste (as defined in R 299.9203 "Hazardous Waste Rule 203") reaches the surface water or groundwater, or A fire, explosion, or other release of hazardous waste or hazardous waste constituent occurs that could threaten human health or the environment. or A release of >1lb (or ≤1lb if not immediately cleaned up) hazardous waste to the environment from a tank system or associated secondary containment system. Additional hazardous waste reporting requirements under NREPA Part 201 and CERCLA.	Immediate: to PEAS (or for Tank systems/secondary containment, within 24 hours of discovery: to DEQ-WHMD) and to NRC if threat to human health or environment outside facility by generator, or owner or operator of TSDF, or transporter.	For large quantity generators and TSDF: Within 15 days after incident IF the contingency plan had to be implemented: to DEQ-WHMD. For tank/secondary containment systems: Within 30 days of discovery: to DEQ-WHMD. For transporters: to US DOT if required per 49 CFR 171.	PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) NRC 800-424-8802 NREPA Part 111 requires transporters to comply with 49 CFR 171 and 33 CFR 153. For further information contact DEQ-WHMD
NREPA 1994 PA 451 Part 121, Liquid Industrial Waste	The liquid industrial waste spill could threaten public health, safety, welfare, or the environment, or has reached surface water or groundwater. Liquid industrial waste includes nonhazardous brine, by-product, industrial wastewater, leachate, off-spec commercial chemical product, sludge, sanitary or storm sewer clean-out residue, grease trap clean-out residue, spill residue, used oil, or other liquid waste not regulated by other laws.	Immediate: to PEAS and local authorities by generator, transporter, or owner or operator of facility. Refer to MCL 324.12111(1) for required report elements	Prepare within 30 days after incident. Submit upon request: to DEQ-WHMD district supervisor. Refer to MCL 324.12111(1) for required report elements	PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) For further information contact DEQ-WHMD
NREPA 1994 PA 451 Part 31, Water Resources Protection (Sewer Systems)	Discharge of untreated sewage or partially treated sewage from a sewer system onto land or into the waters of the state. "Sewer system" means a sewer system designed and used to convey sanitary sewage or storm water, or both.	Immediate (within 24 hours): to DEQ-WB district office (PEAS after hours); Local health depts.; Daily newspaper circulated in source & affected counties; & Affected municipalities.	At end of discharge: to same parties notified initially on Form EQP 5857 (Rev. 10/01) "Report of Discharges of Untreated or Partially Treated Sewage." Includes results of E. coli testing.	PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) For further information contact DEQ-WB-FOD
NREPA 1994 PA 451 Part 41, Sewerage Systems	Discharges of pollutants from sewerage systems (which can include combined sewers) in excess of those authorized by a discharge permit issued by the DEQ to surface water or groundwater as a result of a facility breakdown or emergency. Sewerage systems handle sanitary sewage or other industrial liquid wastes.	Promptly: to DEQ-WB district office (PEAS after hours) by owner.	Within 72 hours: to DEQ-WB district supervisor, outlining cause, discovery, corrective actions taken to minimize impact, restore operations, and eliminate future unpermitted discharges.	PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) For further information contact DEQ-WB-FOD
NREPA 1994 PA 451 Part 55, Air Pollution Control	Abnormal condition, start-up, shutdown, or malfunction that results in emissions exceeding permissible (in rule, permit or order) levels of hazardous air pollutants (HAPs) (CAA Sect. 112(b)) or toxic air contaminants (as specified in permit) for > 1 hour, or any air contaminant for > 2 hours. Written follow-up report only required for emission exceedences lasting > 2 hours.	As soon as possible, but not later than 2 business days after discovery: to DEQ-AQD district office (PEAS after hours) by owner or operator.	Within 10 days after start-up, shutdown, or abnormal condition, malfunction corrected. Or within 30 days of abnormal condition, malfunction discovery- whichever first: to DEQ-AQD district supervisor.	PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) For further information contact DEQ-AQD

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Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
49 CFR 191 Transportation of Natural and Other Gas by Pipeline	An incident, meaning: (1) Release of gas from a pipeline or of liquefied natural gas or gas from an LNG facility that results in: Death or hospitalization; or Property damage $\geq$ \$50,000. (2) Event that results in emergency shutdown of LNG facility. (3) Significant event per operator. Written Incident reports not required for LNG facilities. Applies to pipeline systems and the transportation of gas through those systems in or affecting interstate or foreign commerce. (See 49 CFR 191.3 for details.)	Earliest practicable moment following discovery: to NRC by operator.	As soon as practicable, and within 30 days after discovery: to US DOT. on DOT Form PHMSA F 7100.1 (03-04) "Incident Report – Gas Distribution System." or PHMSA F 7100.2 (01-2002) "Incident Report – Gas Transmission and Gathering Systems" Supplemental report filed as necessary as soon as practicable. Written report not required for LGN facilities.	NRC 800-424-8802 For further information go to http://ops.dot.gov or contact US DOT PHMSA, Office of Pipeline Safety at 202-366-4595
49 CFR 195 Transportation of Hazardous Liquids by Pipeline	Release of hazardous liquid (petroleum, petroleum products, or anhydrous ammonia) or carbon dioxide from a pipeline system that results in any of the following: (a) Explosion or fire; (b) Release of $\geq$ 5 gallons (except if $<$ 5 barrels released due to maintenance and release not otherwise reportable, confined to property, does not pollute water, and cleaned up promptly); (c) Death of any person; (d) Injury requiring hospitalization; or (e) Property damage $>$ \$50,000. (See 49 CFR 195.50, revised 1/8/02, for details) Applies to pipeline facilities and the transportation of hazardous liquids associated with those facilities in or affecting interstate or foreign commerce. (See 49 CFR 195.1 for details.)	Earliest practicable moment following discovery: to NRC by operator If Release caused: Death or hospitalization; Fire or explosion; Property damage; Water pollution; or was Significant per the operator.	As soon as practicable, and within 30 days after discovery: to US DOT on DOT Form PHMSA F 7000-1 (01-2001) "Accident Report – Hazardous Liquid Pipeline Systems" Supplemental report must be filed within 30 days after operator receives changes or additions to original report.	NRC 800-424-8802 For further information go to http://ops.dot.gov or contact US DOT PHMSA, Office of Pipeline Safety at 202-366-4595
1978 PA 368 Part 135, Radiation Control	For any emergency. Or for incident involving naturally occurring or accelerator produced radioactive material - Immediate notice if: Incident may have caused or threatens to cause: dose to body 25 rems, to skin 150 rems, to extremities 375 rems (per rule 247); 24 hour concentration exceeds 5000 times limits specified in table II of rules 261 to 269; contamination causes operation shut down for 1 week, or property damage $>$ \$100,000. Notice within 24 hours if: Incident may have caused or threatens to cause: dose to body 5 rems, to skin 30 rems, to extremities 75 rems (per rule 247); 24 hour concentration exceeds 500 times limits specified in table II of rules 261 to 269; contamination causes operation shut down for 1 day, or property damage $>$ \$1000.	Immediate or within 24 hours (see reporting criteria): to DEQ-Radiological Protection Program (PEAS after hours) or MI Dept of State Police (MSP) Operations Division. by licensee or registrant.	Within 30 days after release: licensee or registrant shall submit written report to DEQ-WHMD Hazardous Waste and Radiological Protection Section. Written report also required if level of radiation or concentration of radioactive material in unrestricted area $>$ 10 times any applicable limit. See Rule 250 (R 325.5250) for required report content.	DEQ-Radiological Protection Program 517-241-1274 MSP 517-336-6100 PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) For further information contact DEQ Radiological Protection Program

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Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
10 CFR 20 (Standards for Protection Against Radiation)	For incident involving source, by-product, or special nuclear radioactive material - Immediate notice if: Event that may have caused or threatens to cause: effective dose equivalent to individual 25 rems, lens dose equivalent 75 rems, shallow-dose equivalent to skin or extremities 250 rads; individual could receive 5 times annual limit on intake in 24 hours. OR Any lost, stolen, or missing licensed material in an aggregate quantity equal to or greater than 1000 times the quantity specified in appendix C to part 20 under such circumstances that it appears to the licensee that an exposure could result to persons in unrestricted areas. Notice within 24 hours if: Event that may have caused or threatens to cause: an individual in 24 hours to receive effective dose equivalent >5 rems, lens dose equivalent >15 rems, shallow-dose equivalent to skin or extremities >50 rems; individual could receive >1 times annual limit on intake in 24 hours.	Immediate or within 24 hours (see reporting criteria): to USNRC by USNRC Licensee responsible for the incident.	Within 30 days of incident: licensee shall submit written report (report content specified in 10 CFR 20.2003) to USNRC. Written report also required for occurrences as specified in 10 CFR 20 Section 20.2203 and after the occurrence of any lost, stolen, or missing licensed material becomes known to the licensee, and if at the time the report is filed all licensed material in a quantity greater than 10 times the quantity specified in appendix C to part 20 is still missing.	US Nuclear Regulatory Commission (USNRC) 301-816-5100 For further information contact DEQ Radiological Protection Program 517-241-1274
1978 PA 368 Part 133, Dry Cleaning	Condition or incident presents a threat or hazard to public health or safety.	Immediate: to DEQ-AQD district office (PEAS after hours) by owner or operator.	Within 30 days after incident: to DEQ-AQD district supervisor.	PEAS: 800-292-4706 (from within MI) or 517-373-7660 (from outside MI) For further information contact DEQ-AQD
MIOSHA 1974 PA 154 Section 61, Records & Reports; Notice of Fatalities or Hospitalization	Any release that results in one death or the hospitalization of 3 or more persons.	Within 8 hours: to MIOSHA Hotline.	Not required.	MIOSHA Hotline 800-858-0397 For further information contact DLEG-MIOSHA 517-322-1814
TSCA 40 CFR 761.125 (PCBs)	Spills of PCBs at concentrations of 50 ppm or more and subject to decontamination requirements under TSCA that: contaminate surface water, sewers, drinking water supplies, grazing lands or vegetable gardens, or exceed 10 pounds. (TSCA specifies that these requirements are in addition to any under CWA or CERCLA. e.g. CERCLA requires spills of 1 pound or more to be reported to NRC.)	As soon as possible after discovery, and within 24 hours: to EPA Region 5.	Not required to be submitted. Records of cleanup and certification of decontamination shall be documented.	EPA Region 5 Toxic Program Section 312-886-6003 For further information contact EPA Region 5

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Additional reporting requirements might be found in **permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
SARA Title III Section 313 40 CFR 372 (Toxic chemical release reporting)	Covered facilities as defined in 40 CFR 372 subpart B are subject to toxic chemical release reporting for toxic chemicals and chemical categories listed in 40 CFR 372 subpart D. On 6/30/05, methyl ethyl ketone (MEK) was removed from the list of toxic chemicals. 71 FR 32464 (6/6/06) amended 40 CFR Part 372 to include NAICS subsector and industry codes to determine covered facilities.	Not applicable.	Annually by July 1: report aggregate releases (permitted & unpermitted) to EPA & SERC on EPA's Form R "Toxic Chemical Release Inventory Reporting Form" (EPA Form 9350-1, Rev. 08/2005)	Michigan SARA Title III Program accepts reports on behalf of SERC For further information contact Michigan SARA Title III Program 517-373-8481

Table prepared by the Michigan SARA Title III Program in the DEQ

Acronyms used in table:

AQD= Air Quality Division
 AST= Above Ground Storage Tank
 BSR= Bureau of Safety & Regulation
 CAA= Clean Air Act
 CERCLA= Comprehensive Environmental Response, Compensation and Liability Act of 1980
 CFR= Code of Federal Regulations
 CWA= Clean Water Act
 DEQ= Michigan Department of Environmental Quality
 DLEG= Department of Labor and Economic Growth
 DOT= Department of Transportation
 EHS= Extremely Hazardous Substance
 EO= Executive Order
 EPA= U. S. Environmental Protection Agency
 ESSD= Environmental Science & Services Division
 FL/CL= Flammable and combustible liquids

FOD= Field Operations Division
 FR= Federal Register
 HAP= Hazardous Air Pollutant
 HB= House Bill
 LEPC= Local Emergency Planning Committee
 LNG= Liquefied Natural Gas
 LPG= Liquefied Petroleum Gas
 MCL= Michigan Compiled Laws
 MDA= Michigan Department of Agriculture
 MIOSHA= Michigan Occupational Safety and Health Act
 MSP= Michigan Department of State Police
 NAICS= North American Industry Classification System
 NRC= National Response Center (U.S. Coast Guard)
 NREPA= Natural Resources & Environmental Protection Act
 OGS= Office of Geological Survey
 OPS= Office of Pipeline Safety (US DOT)
 OSC= On Scene Coordinator

PA= Public Act (Michigan)
 PCB= Polychlorinated biphenyl
 PEAS= Pollution Emergency Alerting System
 RQ= Reportable Quantity
 RRD= Remediation & Redevelopment Division
 RSPA= Research & Special Programs Administration (US DOT)
 SARA= Superfund Amendments and Reauthorization Act of 1986
 SERC= State Emergency Response Commission
 TSCA= Toxic Substance Control Act
 TSDF= Treatment, Storage & Disposal Facility
 US DOT= U.S. Department of Transportation
 USEPA= U. S. Environmental Protection Agency
 USNRC= U. S. Nuclear Regulatory Commission
 UST= Underground Storage Tank
 WB= Water Bureau
 WHMD= Waste & Hazardous Materials Division

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations.**

Additional reporting requirements might be found in **permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.

ATTACHMENT B

AGENCY SUBMITTAL DOCUMENTATION



**CONESTOGA-ROVERS
& ASSOCIATES**

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

July 26, 2007

Reference No. 17303

Mr. Phil Stachlewitz
Ypsilanti Township Fire Department
222 South Ford Blvd
Ypsilanti, Michigan 48198

Dear Mr. Stachlewitz:

Re: Contingency Plan for Environmental Investigation and Remedial Waste
Activities Conducted by ENCORE
2901 Tyler Road, Ypsilanti, Michigan
Company Vehicle Operations
Ypsilanti, Michigan

Conestoga-Rovers & Associates, on behalf of ENCORE, is conducting environmental investigations and remedial activities to address subsurface conditions the Company Vehicle Operations property at 2901 Tyler Road, Ypsilanti, Michigan. These activities will result in the generation of hazardous and non-hazardous wastes. Due to the generation of hazardous wastes, a Contingency Plan is required to describe the course of action to be followed in case of a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment (40 CFR 265.51[a]).

This Contingency Plan is associated with hazardous wastes generated from environmental investigations and remedial activities only. Hazardous wastes generated and stored at the Site resulting from the general Site business operation are outside the scope of this Contingency Plan.

As required by federal regulations (40 CFR 265.53(b)), a copy of this Contingency Plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Beth Landale

BL/sp/1/Det.
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July 26, 2007

Reference No. 17303

Ms. Deborah Phillips
St. Joseph Mercy Hospital
5301 E. Huron River Drive
Ypsilanti, MI 48197

Dear Ms. Phillips:

Re: Contingency Plan for Environmental Investigation and Remedial Waste
Activities Conducted by ENCORE
2901 Tyler Road, Ypsilanti, Michigan
Company Vehicle Operations
Ypsilanti, Michigan

Conestoga-Rovers & Associates, on behalf of ENCORE, is conducting environmental investigations and remedial activities to address subsurface conditions the Company Vehicle Operations property at 2901 Tyler Road, Ypsilanti, Michigan. These activities will result in the generation of hazardous and non-hazardous wastes. Due to the generation of hazardous wastes, a Contingency Plan is required to describe the course of action to be followed in case of a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment (40 CFR 265.51[a]).

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July 26, 2007

Reference No. 17303

Mr. Daniel Minzey
Washtenaw County Sheriff Department
2201 Hogback Road
Ann Arbor, Michigan 48105

Dear Mr. Minzey:

Re: Contingency Plan for Environmental Investigation and Remedial Waste
Activities Conducted by ENCORE
2901 Tyler Road, Ypsilanti, Michigan
Company Vehicle Operations
Ypsilanti, Michigan

Conestoga-Rovers & Associates, on behalf of ENCORE, is conducting environmental investigations and remedial activities to address subsurface conditions the Company Vehicle Operations property at 2901 Tyler Road, Ypsilanti, Michigan. These activities will result in the generation of hazardous and non-hazardous wastes. Due to the generation of hazardous wastes, a Contingency Plan is required to describe the course of action to be followed in case of a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment (40 CFR 265.51[a]).

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July 26, 2007

Reference No. 17303

Mr. Rob Houpt
Inland Waters Pollution Control
2021 S. Schaefer Highway
Detroit, Michigan 48217

Dear Mr. Houpt:

Re: Contingency Plan for Environmental Investigation and Remedial Waste
Activities Conducted by ENCORE
2901 Tyler Road, Ypsilanti, Michigan
Company Vehicle Operations
Ypsilanti, Michigan

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