Resource Conservation and Recovery Act (RCRA) Contingency Plan

FMC Corporation

Middleport, New York

Prepared by:
FMC Corporation
Agricultural Solutions
100 Niagara Street
Middleport, New York

Date:
October 13, 2020

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Attachments

CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Brent Sensenich
Plant Manager

Oct. 13, 2020
Date

1 Facility Description [373-2.4]

FMC Corporation (FMC) owns and operates a pesticide formulation facility located in the Village of Middleport and the Town of Royalton, New York. The mailing address and location of the facility is:

FMC Corporation
100 Niagara Street
Middleport, New York, 14105-1398

Telephone: 716-735-6300

The pesticides are in the form of finely grained powders and liquids and exhibit varying degrees of toxicity. Some products are combustible and can potentially release toxic vapors and fumes upon combustion.

The Middleport facility conducts formulating and packaging operations for several key FMC agricultural product lines, including:

- Furadan®, an insecticide used on rice, corn, and alfalfa;
- Marshal®, an insecticide used on rice,
- Command®, an herbicide used on cotton, peas, soybeans and sweet potatoes,
- Rugby®, an insecticide used on bananas, sugar cane, tobacco and tomatoes,
- Talstar®, an insecticide used on termites, structural pests, and wood damaging insects; and
- Prevathon®/ Coragen®, insecticides used on cotton, corn, alfalfa and other crops.

A number of other products are also mixed and packaged in smaller volumes. The facility mixes a variety of formulations, including dustless powders, micro-encapsulated liquid and flowable liquids in different sized and shaped packaging ranging from 20-gram foil packets to 500-kilogram containers. Once packaged, crop protection products are shipped to North American and overseas customers.

Materials used in facility operations consist of pesticide active ingredients (AIs) and inert materials. AIs used at the facility include: carbofuran (Furadan®), carbosulfan (Marshal®), clomazone, cadusafos (Rugby®), chlorpyrifos, permethrin, bifenthrin (Talstar®) , abamectin, cypermethrin (alpha and zeta), pyrethroids, iprodione, imidacloprid, acetamprid, flutriafol, Rynaxypyr® (Coragen®, Prevathon®), and Cyazypyr®. In addition, FMC also formulates and package pesticides (i.e., Ethos®) using biopesticides or biologicals (FMCH001 and BaD747) as AIs. The primary inert materials used include: petroleum naptha and distillates (i.e., Aromatic 100, Aromatic 200), mineral oil, vegetable oils, binder resins (i.e., Rubinate M), sodium nitrate, calcium chloride, clays, water, propylene glycol and other materials.

In general, facility operations include, but may not necessarily be limited to, the following:

- Acceptance and conditioning of raw materials;

- Blending and mixing raw materials to develop intermediate and final products;
- Operation of air pollution controls;
- Final product packaging;
- Wastewater treatment;
- Hazardous and non-hazardous waste management;
- Laboratory operations, including quality control and product testing,
- Maintenance activities; and
- Office administration.

The Middleport facility operates as a large quantity hazardous waste generator that accumulates waste for less than 90 days prior to off-site disposal pursuant to 6 NYCRR Part 373-1.1(d)(1)(iii). However, there are two inactive hazardous waste surface impoundments (see Section 1.6 below) that have not been closed under the Resource Conservation and Recovery Act (RCRA). The facility, and consequently the two (2) impoundments, are currently subject to the terms and conditions of under the terms and conditions of an Order on Consent and Administrative Settlement (Index No. CO 9-20140625-40), entered into by FMC and the New York State Department of Environmental Conservation ("NYSDEC"), effective June 6, 2019 (the "Order"). This Order replaces the now terminated 1991 Administrative Order on Consent (the "1991 AOC") entered into by FMC, NYSDEC and the United States Environmental Protection Agency.

The Order authorizes FMC to operate hazardous waste units as specified in Exhibit E of the Order and to conduct RCRA corrective actions for Operable Units (OUs) associated with the facility. Exhibit E of the Order also requires compliance with NYSDEC hazardous waste treatment, storage and disposal permitting requirements final status regulations (6 NYCRR 373-2).

1.1 Plan Design and Operation

This RCRA Contingency Plan contains emergency provisions which will be implemented to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil or surface water. The information contained in this document is prepared in accordance with the requirements for a RCRA Contingency Plan, as set forth in 6 NYCRR sections 373-2.3, 373-2.4, 373-1.1(d)(1)(iii)(c)(5) and 373-1.1(d)(1)(xii)(a). The contingency plan and emergency response requirements are specified in 373-2.4 and in Module I, Condition E in Exhibit E of the Order.

Copies of this RCRA Contingency Plan and any future amendments must be maintained at the plant and 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 to the facility.

1.2 Hazardous Wastes

The RCRA hazardous and universal wastes typically generated at the facility include, but may not be limited to, the following:

- Carbofuran and Carbosulfan Solids
- Carbofuran and Carbosulfan Clean-up Wastewater
- Carbofuran and Carbosulfan Contaminated Debris
- Spent Lab Solvents
- Waste Paint
- Switches/lights/thermostats
- Contaminated Soils and/or Debris
- Activated Carbon

Additional information pertaining to these routinely generated waste streams is provided in Attachment A – Routinely Generated Hazardous Wastes. Wastes generated from remedial activities at the facility, included at the Water Treatment Plant (WTP) will be subject to NYSDEC Contained-In Determination that the wastes will NOT require management as a hazardous waste.

1.3 Hazardous Waste Management Areas

A plant site diagram showing all hazardous waste management areas, buildings (identified by designated numbers), other facilities, and entrances to and roads inside the plant site is included as Attachment B.

Hazardous wastes are accumulated in containers and in tanks for less than 90 days in permit exempt areas of the plant pursuant to 373-1.1(d)(1)(iii).

1.4 Containers [373-3.9]

The facility manages the hazardous wastes described in Section 1.2 in Central Accumulation Areas (i.e., 90-day accumulation areas) and satellite accumulation areas listed in Attachment C - Summary of Container and Satellite Accumulation Areas. The total volume of liquid wastes stored in containers at these permit exempt areas at one time is less than 8,800 gallons.

1.5 Tank Systems [373-3.10]

The facility has the capability to manage hazardous waste in tanks T-6022 and T-6023 as 90-day Central Accumulation Areas. Tank T-6022 is a 5,500-gallon stainless steel aboveground storage tank (AST) system and Tank T-6023 is an 18,000-gallon stainless steel AST system. Both tanks are associated with the facility's Calfran treatment system (a RCRA-permit exempt treatment unit discussed in Section 1.7). Tank T-6022 is situated within the Building 70 Calfran Room, and can be used for the accumulation of carbofuran wastewater concentrate generated from the Calfran wastewater treatment process. A series of trench drains situated within the Calfran Room and tied to the Calfran treatment system provide secondary containment for the AST. Wastewater from the plant trench drains are collected in an exterior sump that discharges

to exterior tank (T-6023). Tank T-6023 is situated outside next to the Calfran Room and has secondary containment. During certain periods (i.e., when the Calfran Unit is not operated), Tank T-6023 is typically used as a holding tank for carbofuran wastewater until treated by the Calfran system (see Section 1.7). Occasionally, Tank T-6023 is used to accumulate carbofuran wastewater for 90 days or less prior to off-site disposal.

In addition to the aforementioned container accumulation areas and tank systems, there are several other water treatment tanks associated with two (2) RCRA-permit exempt water treatment units (discussed in Section 1.7), which, while not regulated as tank systems pursuant to 6 NYCRR 373-3.10, are subject to contingency planning requirements as per 6 NYCRR 373-1.1(d)(1)(xii)(a).

A summary of the tanks covered under this Contingency Plan is provided in Attachment D – Summary of Aboveground Tanks. The building location of these tanks can be found by using the facility layout drawing, Attachment B.

1.6 Surface Impoundments [373-2.11]

Historically, three (3) surface impoundments subject to RCRA were operated on site, as indicated on the site map in Attachment B. All three (3) impoundments ceased to receive storm water requiring management as a hazardous waste on or before November 8, 1988. Closure activities for the central surface impoundment were completed in September 1989, and that closure was approved by the NYSDEC in March 1990. Residual impacts from the use of the central surface impoundment are being managed pursuant to Order. The eastern surface impoundment (ESI) is no longer used as an impoundment. It is currently being used for the storage of contaminated soils and other materials generated from previous Interim Corrective Measures, which have been undertaken by the facility to address obligations under the RCRA Corrective Action program. The western surface impoundment (WSI) has undergone partial closure by removal and replacement of the original liner, and is being used as an Interim Corrective Measure. This surface impoundment is presently used for the collection of nonhazardous storm water prior to treatment and discharge under the facility's State Pollutant Discharge Elimination System (SPDES) permit.

The terms and conditions of the Order authorize the current status and operation of the ESI and WSI, pending the results of a corrective measures study for the plant property. The ESI and WSI will be closed, if necessary, in connection with implementing the final corrective action for the plant.

The WSI also enables control and containment of potential releases of liquid hazardous materials and/or fire control waters that may be generated at the facility. As specified in the Order, use of the WSI as a nonhazardous surface water impoundment is contingent upon continued operation of the WSI underdrain system, implementation of a formal WSI monitoring program, and implementation of a contingency plan in the event that the WSI is found to contain hazardous wastes. FMC's WSI Operations Plan (WSI Operations Plan) contains the WSI Monitoring Work Plan and the WSI Contingency Plan, as required by Order.

1.7 Exempt Water Treatment Units [373-1.1(d)(1)(xii)]

FMC operates two water treatment units that are exempt from permitting, as set forth in 6 NYCRR 373-1.1(d)(1)(xii). These treatment units are addressed in this Contingency Plan pursuant to 6 NYCRR 373-1.1(d)(1)(xii)(a). The exempt units are described as follows:

- Water Treatment Plant (WTP): The facility's WTP is regulated pursuant to a SPDES permit issued by NYSDEC. The WTP, shown on the facility drawing included in Attachment B, treats surface water run-off from the northern portion of the facility, groundwater extracted or otherwise collected from the groundwater remedial systems operated in connection with on-going RCRA Corrective Action program and, if operating, the Calfran water unit. Influent coming into the WTP at times exhibits the Toxicity Characteristic Leaching Procedure (TCLP) characteristic of a hazardous waste for arsenic, and may at times, be contaminated with trace levels of pesticides. The treated water is discharged to Tributary 1 of Jeddo Creek under the terms and conditions of SPDES Permit No. NY0000345. Wastes generated from the WTP processes are subject to NYSDEC-approved sampling/analysis regime and NYSDEC waste disposal concurrence.

- Calfran Unit: Located within its own room in Building 70, the Calfran unit can be used to treat (i.e., concentrate) various wastewaters generated at the facility using a cold vaporization process allowed under the facility's SPDES permit. Attachment B includes a process flow diagram of the Calfran system. Carbofuran equipment and washdown wastewaters from the plant are collected in an exterior sump that discharges to an exterior tank (T-6023). Tank T-6023 is connected to an equalization tank (T-5030) located in the Calfran Room, which discharges to the Calfran unit. This Calfran process, which occurs under a vacuum and at reduced temperatures, essentially draws water vapor from the wastewater influent, thereby reducing the volume of waste that must be disposed off-site. Water vapor is formed in the reaction vessel and condensed. This condensate water collects in tank T-5020, which in turn discharges to the WTP. The contaminants remaining behind in the reaction vessel become concentrated, and ultimately accumulate in Tank T-6022, where they remain prior to off-site disposal as a hazardous waste.

2 Emergency Equipment [373-2.4(c)(5)]

The location, physical description, and a brief outline of the capabilities of FMC's emergency equipment, including fire extinguishing systems, fire extinguishers, halon cylinder system, telephone and radio communication systems, local alarm, spill control equipment, decontamination equipment, and medical treatment facilities, are described below.

2.1 Communications Systems

An internal telephone system, with extensions located throughout the plant, is provided for internal/external communications and to contact the Emergency Contact (EC), or their designee, and/or emergency responders, as further discussed in Section 5.0 below.

An internal telephone activated (**5-0**) intercom system is the primary plant emergency communications system used to provide alerts plant-wide. Two-way radios and cellular telephones are both considered to be secondary modes of communication available within the plant.

The facility telephone/intercom system, radios and cellular telephones, are used daily during plant operations, and are maintained (including repair and/or replacement) as necessary to assure proper operation.

2.2 Fire Control Systems and Equipment

2.2.1 Sprinkler Systems

The Middleport plant maintains both wet and dry sprinkler systems (wet systems in building numbers 48 and 75). The systems use pressurized air that holds the valve seat in place, which prevents water from entering unheated areas. When the sprinkler head opens, the valve seat opens allowing the discharge of water. The systems operate at approximately 100 psi of pressure. All buildings, except for the following, have sprinkler systems in service:

- Building No. 22 – Former Boiler House
- Building No. 104 - Warehouse
- Building No. 80 – Water Treatment Plant
- Building No. 48 – Main Lunch Room and adjacent Training Room
- Building No. 105 – Main Office
- Building No. 74 – Air Stripper
- Building No. 81 – Maintenance Shed

Additionally, the flammable liquids storage building (Building #82) is equipped with a dedicated halon suppression system consisting of two pressurized tanks (capacity 300 c.f. each) hooked up for automatic service.

The sprinkler systems comply with the national fire code standards and are inspected quarterly (including annual full trip testing and dry trip testing) by qualified personnel or vendors in accordance with the facility's established plant preventative maintenance program. The sprinkler systems are maintained, as necessary, based on the results of the quarterly assessments to assure proper operation. Sprinkler inspection reports are maintained at the facility.

2.2.2 Fire Extinguishers

The facility maintains the following types of portable fire extinguishers throughout the plant (see figures in Attachment B):

- Class B, C: CO2 or dry chemical extinguishers; used on flammable liquids & electrical equipment.
- Class A, B, C: dry chemical extinguishers used on all types of fires (except metal fires).

All fire extinguishers comply with the national fire code standards and are inspected monthly by qualified personnel or vendors in accordance with applicable Occupational Safety & Health Administration (OSHA) requirements and the facility's established plant preventative maintenance program. Fire extinguishers are maintained, as necessary, based on the results of the quarterly assessments to assure proper operation. Documentation regarding the assessments are maintained at the facility.

2.2.3 Spill Control Equipment

The facility maintains Spill Kits at various strategic locations throughout the facility, including in proximity to designated hazardous waste areas and oil handling areas. Descriptions of these spill kits are provided in Attachment E. Spill Kit locations are shown on the figure provided in Attachment B. The spill kits are inspected monthly.

2.2.4 Water Supply and Hydrants

Locations of water supply and hydrants are shown on a drawing provided in Attachment B.

3 Implementation of the Contingency Plan [373-2.4(b)]

The Contingency Plan will be implemented if there is a fire, explosion, or any unplanned release of hazardous waste or hazardous waste constituents (i.e., carbofuran, carbosulfan) that could threaten human health or the environment. The EC designated in Attachment F - Emergency Response Contact Information, or the EC's designee (during 2nd and 3rd shift), has the authority to make the decision to implement the Contingency Plan.

WTP personnel will be kept informed at all times when the Contingency Plan is implemented so that proper precautions can be taken to avoid operational and/or permit compliance issues that could result from the discharge of unintended compounds and wastewaters. If needed, the actions will be taken as described in the WSI Operations Plan, should the WSI receive any releases or fire control water that may contain hazardous wastes or hazardous waste constituents.

In the event of an emergency that affects a specific Central Accumulation Area, waste will be temporarily stored in another designated Central Accumulation Area, or outside firms will be contracted to remove the affected waste.

3.1 Spills or Material Release

A spill or release of hazardous waste or hazardous waste constituents is the most likely situation that will require the facility's RCRA Contingency Plan to be implemented. Facility personnel are trained in accordance with applicable rules and regulations (as described in a Personnel Training Plan that have been approved under a final Part 373 Permit application for the facility) and are authorized to address "incidental" releases (as defined in Section 6.4.1 of this plan) of hazardous substances (including hazardous waste) under certain circumstances that would not threaten human health or the environment. The following are examples of non-incidental situations during which the EC may decide to implement the Contingency Plan:

- Spill from a transport vehicle transporting and/or loading waste from a container storage area or storage tank outside secondary containment areas.
- Spill from fork lift transporting drums to a drum storage area outside secondary containment areas.
- Leaking of hazardous waste from drums or storage tanks of hazardous waste outside secondary containment areas.
- A spill resulting in the release of flammable materials causing a fire or explosion hazard.
- The spill could cause the release of toxic liquids or fumes.
- The spill results in the potential for contamination of on-site environmental media (soil, groundwater, surface water).
- The spill cannot be contained on-site, resulting in off-site migrations and/or contamination of environmental media (soil, groundwater, surface water).

3.2 Fire and/or Explosion

Fires and/or explosions directly involving or occurring in the vicinity of one or more of the facility's hazardous waste areas could result in the release of hazardous wastes or hazardous waste constituents that could threaten human health or the environment (e.g., spreading of waste via contaminated fire water run-off). Such events may therefore require implementation of the Contingency Plan, and if needed, components of the WSI Operations Plan. Examples of situations during which the EC may decide to implement the Contingency plan include, but are not limited to, the following:

- A fire and/or explosion in any one of the hazardous waste areas or other areas which may affect the hazardous waste areas.
- A fire that causes the release or threatened release of toxic fumes, hazardous wastes or hazardous waste constituents.
- The fire spreads and could possibly ignite materials at other locations on-site.
- The fire could spread to off-site areas.
- Use of water and/or chemical fire suppressant could result in surface water contamination.
- A danger exists that an explosion could occur, causing a safety hazard because of flying fragments and/or shock waves.
- A fire could cause heat-induced explosions.
- An imminent danger exists that an explosion could ignite other hazardous wastes or hazardous materials at the facility.
- An imminent danger exists that an explosion could result in release of toxic material.

3.3 Weather Emergency

Certain weather conditions could result in flooding and/or infrastructure damage that could expose hazardous wastes or hazardous waste constituents to the elements or to the WSI, and represent a potential risk for contamination of environmental media, either on-site or off-site. Examples of weather emergencies during which the EC may decide to implement the Contingency Plan include, but are not limited to, the following:

- Heavy rains could lead to facility flooding, which could inundate hazardous waste storage areas causing over topping of drums and/or releases of hazardous wastes.
- High winds or heavy snow or ice accumulation could cause failure of roofing systems, exposing areas that manage hazardous wastes or hazardous waste constituents to weather elements, or otherwise cause operational issues that lead to the exposure of, or release of, hazardous wastes or hazardous waste constituents.
- Weather-related emergencies could cause localized power failures that could have an effect on facility operations associated with the storage and/or treatment of hazardous wastes and hazardous waste constituents.

4 Arrangements With Agencies [373-2.3(g), 373-2.4(c)(3)]

The facility does not maintain its own HazMat response team, fire brigade or other emergency response capabilities, and is therefore reliant upon external emergency response agencies and contractors to respond to facility emergencies. This Contingency Plan describes arrangements in effect with local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, in accordance with the hazardous waste preparedness and prevention requirements set forth in 6 NYCRR 373-2.3(g) and the Order.

Long standing arrangements have been in effect with local agencies to assist in meeting emergencies that may occur at the FMC Middleport facility. A listing of applicable agencies and emergency telephone numbers is provided in Attachment F. Attachment G provides a list of the entities to which a copy of the Contingency Plan has been provided.

The facility updates and submits emergency and hazardous chemical inventory forms to the local, county and state agencies under SARA Title III (Section 312 of the Emergency Planning and Community Right-to-Know Act of 1986).

The Middleport Fire Department and/or Niagara County Emergency Services are the responding authorities in the event of a fire or explosion at the facility. The Middleport Fire Department makes periodic inspections of the facility and is apprised of facility arrangements. The fire department has full authority as soon as they arrive at the site. The facility utilizes the Lockport Eastern Niagara hospital (primary) and the Medina Memorial Hospital (secondary) whenever medical emergencies occur.

The primary emergency authority for addressing accidental hazardous substance, hazardous waste or hazardous waste constituent releases that could threaten human health or the environment will be provided by Niagara County Emergency Services. The Middleport Volunteer Fire Department will provide support to the Niagara County Emergency Services where appropriate, considering training and resource limitations. If the Niagara County Emergency Services is not present, then the Middleport Volunteer Fire Department will be the primary emergency authority. Any post-emergency cleanup actions will be led by the Middleport plant's approved hazardous waste management cleanup contractor.

The FMC EC, or their designee, will be the primary emergency authority for the plant, and will be responsible for coordinating directly with all responding emergency agencies and/or contractors. The FMC EC will be available to assist the Chief of the external emergency responders, as appropriate, on deciding on those actions needed to protect off-site areas and neighbors (i.e., evacuation or shelter in-place). The full extent of the FMC EC's actions to be taken in an emergency circumstance are more fully described in Sections 5 and 6.2 below.

FMC will hold an annual meeting/mutual aid drills at the facility to familiarize local response agencies (i.e., Middleport Fire Department, Niagara County Emergency Services/LEPC) with

the layout of the facility, properties of materials handled at the facility and associated hazards, facility entrances and roadways, and possible evacuation routes.

The Middleport Police Department is also a responding authority, should their services be needed at the facility.

5 Emergency Coordinator [373-2.4(c)(4), (f), (g)(f)]

The EC is familiar with all aspects of the Contingency Plan, all operations and activities at the facility, the location and characteristics of wastes handled, the location of records within the facility, and the facility layout. The EC, or the EC's designee (during 2nd and 3rd shift), has the authority to commit the resources necessary to carry out the Contingency Plan.

The EC coordinates and directs facility emergency response efforts and plant personnel. The EC shall inform the officials-in-charge of external emergency response agencies of his/her role and shall coordinate with the external responders.

Attachment F lists the primary EC and alternates listed in order.

The EC is responsible for the following:

1. Undertaking an initial assessment of any notified emergency, as discussed in Section 6.2.
2. Making sure that all necessary external emergency response teams have been notified and are responding.
3. Making sure that nearby neighbors (i.e., Royalton-Hartland school) and Village of Middleport officials are notified of emergencies that may affect off-site areas.
4. Providing information concerning plant operations and the location and characteristics of materials handled at the plant to external emergency responders.
5. Working with external emergency responders to help appropriate officials coordinate and direct the response efforts needed to protect the facility, facility personnel, off-site areas and neighbors (i.e., evacuation or shelter in-place).
6. Working with facility personnel to implement emergency procedures described in Section 6, and post-emergency procedures, described in Section 7.
7. Notifying the NYSDEC spill hotline and/or the National Response Center if the incident must be reported, as discussed in Section 6.7 and Attachment H.

6 Emergency Response Procedures [373-2.4(g)]

The emergency response procedures set forth in this section are consistent with those set forth in the Middleport facility's Emergency Action Plan (EAP), which constitutes the primary document to be followed in the event of a plant emergency, including those that may involve hazardous waste operations. This Contingency Plan will be reviewed any time the EAP is revised to ensure consistency between the two documents. The procedures set forth below include only those pertaining to hazardous waste emergencies. Additional procedures outlining emergency actions related to other plant emergencies are detailed in the EAP.

Employees are routinely trained on the emergency procedures in the EAP and the RCRA Contingency Plan, including drills.

6.1 Procedures for Reporting Emergencies

The following are the general procedures that should be followed when reporting any plant emergencies involving hazardous waste operations:

- The plant Intercom/Phone System is the primary plant Emergency Communication System to provide first alerts plant-wide. **Dial 5-0 to initiate.**
- Verbal announcements will direct employees and visitors to evacuate the building and proceed to the assembly areas.
- Cell phones and plant radios are used as backup communication systems.
- External emergency telephone numbers are posted near select office telephones and on various bulletin boards in the plant. See Attachment F for a complete list of internal/external FMC and external Emergency Contacts.
- The plant's two (2) Emergency Operations Centers are equipped to transmit and receive information by landline telephone and via cell phone and are located at follows:
    - Primary location - Main Office (Bldg. 105)
    - Secondary location - Maintenance (Bldg. 75)
- The EC, Environmental, Health and Safety (EHS) Manager, Plant Manager, FMC Corporate EHS Counsel and FMC Corporate EHS personnel must be immediately notified of any fires, explosions, spills, leaks, discharges or releases at the Facility
- Once informed about the specific type and extent of the emergency situation, the EC will then implement the appropriate emergency action procedure, as described below and in the EAP.

6.2 Initial Emergency Assessment

In the event of an emergency, the EC or his/her designee will be contacted immediately after external response resources are summoned. Upon notification, and while emergency response personnel are in route, the EC will:

- Identify the character, exact source, amount, and area extent of any released materials. This may be done by observation or review of facility records (including, but not limited to, applicable Safety Data Sheets (SDSs)), and if necessary, by chemical analysis, if released material is unknown and time constraints do not negatively affect doing so.

- Check the nearest wind sock (Building 75, Building 70 North or Building 82), the flag, or steam plumes from the facility to note the wind direction to determine appropriate evacuation/assembly requirements for employees or off-site area.

- Assess possible hazards to human health or the environment that may result from the release, fire, or explosion in conjunction with plant EHS personnel or other appropriate personnel. This may be accomplished by observation or review of facility records, \SDSs\ or manifests, and, if necessary, by chemical analysis through either on-site capabilities and/or a third-party assessment, assuming time allows. This assessment shall consider both direct and indirect effects of the release, fire, or explosion, including the effects of any toxic, irritating, or asphyxiating gases that are generated, wind direction, and the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions. The procedure for assessing possible hazards includes:

    - Identification of hazardous properties of the involved materials or by-products thereof based on review of the applicable SDS(s)

    - Determination of the threat to human health or the environment, both on-site and off-site, based on review of relevant materials (including, but not limited to, SDSs or manifests) for the involved materials, the quantities of the involved materials, and the emergency and environmental conditions (e.g., wind direction).

    - Observation and constant monitoring of any environmental conditions (e.g., wind speed and direction based on observed conditions at the WTP weather station or information from local weather stations) that may contribute to the seriousness of the hazard.

Once this initial assessment is complete, the EC will direct facility personnel in taking the appropriate emergency actions as described herein.

The Chief of the primary external emergency authority and the FMC EC will act together to coordinate the response effort. The FMC EC will be available to assist the Chief of the external emergency responders, as may be requested, in deciding actions need to protect off-site areas and neighbors (i.e., evacuation or shelter in-place). The principal responsibility of the FMC EC is to provide comprehensive and detailed information concerning plant operations and the location and characteristics of materials handled at the plant. In addition, the EC is responsible for external spill or release reporting, as discussed in Attachment H.

6.3 Fire or Explosion Emergency

Generally, in case of a fire or explosion at the plant, FMC personnel must:

- Report the fire to internal emergency personnel by calling 5-0 on the intercom.
- Unless properly trained and equipped to fight incipient stage fires, promptly evacuate the area and proceed to the designated assembly area as described in Section 6.5.

6.3.1 Incipient Stage Fires

An incipient stage fire is a fire which is in the initial or beginning stage, and which can be controlled or extinguished by portable fire extinguishers without the need for protective clothing or breathing apparatus.

In the event a fire is discovered in its incipient stage, only properly trained and equipped (e.g., correct extinguisher) plant personnel may use a portable fire extinguisher to fight an incipient stage fire and only if all of the following conditions are met:

- The Middleport Fire Department has been notified or is in the process of being notified;
- The fire is in the incipient stage and is not spreading;
- Escaping the area is possible by leaving from the nearest exit; and
- Once one portable extinguisher is empty, immediately evacuate the area and proceed to the designated assembly area.

6.3.2 Non-Incipient Stage Fires and Explosions

For all other emergencies involving a fire or explosion emergency, site personnel are to immediately contact the Middleport Fire Department (Call 911) and evacuate the area following the Evacuation Procedures outlined below. No attempt is made by FMC employees to respond to a non-incipient stage fire.

6.4 Spills and Releases

6.4.1 Incidental Spills and Releases

A release or spill of a hazardous waste or other substance under OSHA (29 CFR 1910.120) is considered “incidental” when it can be readily contained, neutralized, absorbed by the employee who spilled the material in a manner that does not pose a significant safety or health hazard to the employee. The employee can clean up the material, provided that all of the following conditions are met:

- The employee knows the identity and hazards of the substance (per the waste label, related SDS and/or generator knowledge). SDSs are available via SiteHawk (web based SDS system), in the Building 48 Lunch Room and electronically on the shared drive;

- They are trained in performing the cleanup of the incidental release, such as OSHA required Hazardous Communication (HazCom) training;
- Appropriate personal protective equipment (PPE) and cleanup materials are readily available and used;
- They know how to properly dispose of the material; and
- They are comfortable and confident they can adequately resolve the situation.

Please refer to Attachment E for locations of incidental spill response kits in the plant.

Any person who takes action to clean up an incidental spill is required to contact the EC or EHS personnel immediately after the cleanup has been completed. The EC or EHS personnel will notify the FMC Corporate EHS Counsel and FMC Corporate EHS personnel, and will document the incident and evaluate whether or not the spill/release requires notification of outside agencies as described in Attachment H of this plan.

6.4.2 Non-Incidental Spill/Release ("True" Emergencies)

If any of the above criteria cannot be met or the spill/release is beyond incidental, employees are to promptly evacuate the area, proceed to the designated assembly area and notify the EC immediately. The EC will then contact 911 for assistance from the Middleport Fire Department, Niagara County Emergency Services and/or applicable environmental clean-up contractors, or spill hot-lines.

6.5 Plant Evacuation Procedures [373-2.4(c)(6)]

6.5.1 General

While the majority of hazardous waste emergencies at the plant would require evacuation/escape procedures, a few may require employees to stay indoors (shelter in place due to chemical release) or other designated safe area. The plant's emergency evacuation procedures are designed to respond to many potential emergencies, depending on the degree of seriousness. Nothing in these procedures precludes the EC's authority in determining whether employees should remain inside or evacuate. Building evacuation routes are include in building layout figures in Attachment B.

All Middleport plant personnel have been trained to assist in the safe and orderly evacuation for various types of emergencies. All employees are trained in the complete layout of the plant and the egress/escape routes and evacuation assembly areas. Before leaving for the assembly area, and if safe to do so, employees designated by the EC will do a very quick visual check of the office, shop/work areas, production areas, and storage and other spaces for employees and onsite personnel who could be trapped or otherwise unable to evacuate the area. These individuals have been trained to:

- Direct and assist in safe and orderly emergency evacuation;

- Follow instructions for the various types of emergency situations;
- Be aware of employees, contractors, and visitors with special needs who may require extra assistance; and
- Avoid hazardous areas during the emergency evacuation process.

Even if only a part of the plant is evacuated, a head count of the entire facility must be taken to be certain that all employees, contractors, and visitors are accounted for. This process is discussed in the sections that follow.

6.5.2 Evacuation on First and Second Shifts

After an announcement to evacuate the office building or plant is made, site personnel must take the following steps:

- Depending upon the type and seriousness of the emergency, activate any of the plant emergency shutdown switches (if applicable) and shutdown critical operations in safe-mode prior to evacuating their area;
- Evacuate via the closest, accessible exit route (posted throughout the facility). Promptly leave the affected area via the plant's egress routes. Do not go back to the plant to retrieve personal items.
- Check the nearest wind sock (Building 75, Building 70 North or Building 82), the flag, or steam plumes from the facility to note the wind direction before evacuation to be sure that you are heading in a safe direction (i.e., upwind).
- Gather at the nearest **Evacuation/Assembly Areas** noted below.
  - Building 80 – Water Treatment Plant
  - Building 48 - Main Lunch Room
  - Building 70 – Furadan Lunch Room
  - Building 75 – Maintenance Lunch Room
- Assembly and Evacuation areas locations (as shown in Attachment B) are noted on posters and/or figures posted throughout the plant and on a facility plans. Depending on site conditions, the EC, EH&S Manager and/or Middleport Fire Department may move an assembly area to an alternate location.
- A designated plant employee from the nearest office will be responsible for taking the visitor/contractor sign-in book, the list of plant employees in attendance and the list of any truck transport personnel that are logged and provide that listing to the EC and to the assembly area lead.

- Upon arriving at the designated assembly area, personnel are to line up and the Assembly Area Coordinator (i.e., manager/supervisor) will get a head count and listing of persons present. This assembly area head count list will be compared to daily logs for employees, visitors, contractors and truckers.

    - Contractors will account for their own personnel and then provide information to the Assembly Area Coordinator;

    - Truck drivers will report directly to the Shipping Coordinator who will pass information on to the Assembly Area Coordinator;

    - The Assembly Area Coordinator will report the summary information to the EC.

    - The EC will then provide results of the head count to the senior official from the responding local emergency agency (e.g., Fire Chief) if requested.

- If any persons are still unaccounted for, the senior official from the responding local emergency agency (e.g., Fire Chief) will initiate search and rescue operations.

- The EC is to be immediately notified by cell phone of any unaccounted employees, contractors, or visitors.

- If anyone is injured or contaminated and is present at the assembly area, the EC will facilitate taking appropriate first aid actions (see EAP), if safe to do so.

6.5.3 Evacuation During Off-Shift Hours

During off-shift hours, the EC designee will be responsible for acting as the EC. The plant is staffed with a limited number of personnel after the 2nd shift and resources for responding to emergencies (e.g., plant's Emergency Responder Team personnel) are not typically present.

After an announcement to evacuate the office building or plant is made, site personnel must take the following steps:

- Depending upon the type and seriousness of the emergency, activate any of the plant emergency shutdown switches (if applicable) and shutdown critical operations that require monitoring/supervision prior to evacuating their area;

- All personnel must promptly evacuate when notified and immediately proceed to an assembly area.

- The EC designee is responsible for ensuring a head count is taken to ensure all persons are accounted for and will contact the FMC EC.

- The EC designee will then utilize the listing of off-shift personnel, discussions with evacuated employees, and other information to determine if there are any missing people, and then promptly report head count information to the EC.

- Personnel are to wait at the assembly area until the fire department and the FMC EC or Plant Manager arrive.

6.5.4 If the facility stops operations [373-2.4(g)(6)]

In response to a fire, explosion, or release, and if safe to do so, plant operations will be shut down in safe-mode prior to evacuation to mitigate the potential for releases, leaks, and pressure buildup during the emergency. The EC must monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment, wherever this is appropriate, and take appropriate actions. This may involve may involve manual inspection/observation of the affected areas, if safe to do so.

6.5.5 Facility Re-Entry (ALL Shifts)

No one is to leave the designated assembly/meeting area unless authorized by the EC or the most senior official from the responding public emergency agency (e.g. fire department). "ALL CLEAR" is announced over the plant intercom systems when conditions necessitating the emergency alert or evacuation have been brought under control and the area is safe for employees to enter. Employees may not enter an evacuated area until the "ALL CLEAR" has been announced.

6.6 Prevention of Recurrence or Spread of Fires, Explosions or Releases [373-2.4(6)(5)]

During an emergency, the EC must take all reasonable measures necessary to ensure that fires, explosions, discharges and releases do not occur, recur, or spread to other areas at the facility. Actions that may be taken could include:

- Halting processes and operations,
- Collecting and containing released wastes,
- Prohibiting smoking in affected areas,
- Using non-sparking tools,
- Protecting the area from open flame or heat generating activities,
- Monitoring of valves, pipes, or equipment for leaks or ruptures,
- Removing or isolating containers,
- Ensuring that incompatible wastes or materials are not stored, treated or disposed of with the released materials, and
- Cleaning and/or replacing emergency equipment utilized in the affected area so that they are suitable for re-use.

6.7 Notification of Outside Agencies

In addition to summoning external emergency response resources, many types of environmental incidents must be reported to regulatory agencies. The EC, EH&S Manager or the Plant Manager must be notified of any discharge, leak, spill or releases and shall determine if any notifications are required, and make the appropriate report. Attachment H describes the spill/release reporting procedures.

7 Post-Emergency Procedures [373-2.4(g)(7) - (10)]

7.1 Storage and Treatment of Released Material

Immediately after an emergency, the EC will make arrangements for proper treatment, storage, and/or disposal of all water and contaminated materials resulting from the discharge, release, fire, or explosion. All resulting wastes generated will be considered a RCRA hazardous waste and managed as a RCRA waste unless it can be demonstrated to be non-hazardous in accordance with 6 NYCRR 371.1(d)(3) or (4).

7.2 Incompatible Wastes

After an emergency event, the EC will insure that wastes, which may be incompatible with the released material, are not treated, stored, or disposed until cleanup procedures are completed. SDSs for specific chemicals should be consulted when assessing the compatibility of release materials and other chemicals with which the release may come in contact.

7.3 Post-Emergency Equipment Maintenance

After an emergency event, all emergency equipment utilized in the affected area will be cleaned and/or replaced so that they are suitable for re-use.

The EC or his designee will be responsible for designating an appropriate decontamination area and communicating to the outside emergency response resources the location of the decontamination site. Unless there are overriding concerns, equipment decontamination is to be completed at the WTP.

The EC will coordinate the activities within the decontamination area. All emergency personnel who decontaminate will be required to shower on site prior to leaving the FMC facility.

Any personnel or equipment contacted or contaminated by any smoke, dust, or liquid that is a result of the emergency will require decontamination before leaving the facility or being returned to service.

Typical equipment decontamination procedure is a high-pressure steam bath, Clorox and water wash, and a second steam bath. All wash water discharges are treated on site or are removed from site for treatment at a permitted facility.

7.4 Post-Emergency Notification

Prior to resuming operations in the affected area, an inspection of all utilized safety equipment will be conducted. All appropriate authorities will be notified that the post-emergency equipment maintenance has been performed and operations will resume.

The owner or operator must notify the NYSDEC Commissioner or their designee (as appropriate), and appropriate State and local authorities, that the facility is in compliance with 6 NYCRR 373-2.4(g)(8) before operations are resumed in the affected area(s) of the facility consistent with 6 NYCRR 373-2.4(g)(9).

7.5 Required Reports [373-2.4(g)(10)]

As required in Exhibit E of the Order, any emergency event requiring implementation of the Contingency Plan will be reported, in writing, within 15 days to the NYSDEC Commissioner. This report will, at a minimum, contain the following information:

- name, address, and telephone number of the owner or operator;
- name, address, and telephone number of the facility;
- date, time, and type of incident (e.g., fire, explosion);
- name and quantity of material(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
- the estimated quantity and disposition of recovered material that resulted from the incident.

8 Amendments to the Contingency Plan [373-2.4(e)]

The Contingency Plan will be reviewed and immediately amended, if necessary, whenever:

- Applicable regulations are revised;
- The plan fails in an emergency;
- The list of emergency coordinators changes;
- The list of emergency equipment changes;
- The facility alters its design, construction, operation, maintenance, or other circumstances in a way materially increasing the potential for fires, explosions, or releases of hazardous waste and/or hazardous waste constituents; or
- The actions/responses necessary to comply in an emergency situation change.

All changes in this plan will be sent to every agency, department, and organization on the contingency plan distribution list (Attachment G – Contingency Plan Distribution) within 30 days of the effective date of the change. In addition, any changes to the Contingency Plan made once a final Part 373 Permit for the facility is issued will be subject to the amendment requirements included in 6 NYCRR 373-2.4(e).

Attachments

Attachment A

Routinely Generated Hazardous Waste

Routinely Generated Hazardous Waste					
Waste Name/Facility Waste Code	**Hazardous Waste Code(s)**	**Description**	**Estimated Daily Maximum Amount**	**Possible Hazards/ Special Treatment**	**Precautions & Personal Protective Equipment**
Carbofuran Solids (MHW 3)	P127-Carbofuran	Generated from clean-out of formulation equipment, floor sweepings, and spilled unusable product. Materials include dry dust, emptied supersacks, caked solids and wet sludge. Material is stored in 55-gallon steel drums and plastic-lined 1.4-cubic yard cardboard boxes.	10 tons	Acute Toxicity	Protective equipment when handling includes safety glasses, dust mask, and impervious gloves. Keep off skin, avoid inhalation.
Carbofuran and/or Carbosulfan Clean-up Wastewater (MHW 16)	P127-Carbofuran, P189-Carbosulfan	Generated from wash down of formulation equipment, of formulation areas, equipment decontamination. Wastewater is stored in totes and/or tanks prior to off-site disposal. Carbofuran wastewater may be concentrated in the Calfran unit prior to off-site disposal	5,000 gallons	Acute Toxicity (Carbofuran and carbosulfan are cholinesterase-inhibiting. Atropine is an antidote)	Protective equipment when handling includes protective clothing and impervious gloves. Keep off skin, avoid inhalation.
Carbofuran and/or Carbosulfan Contaminated Debris and Rubbish	P127-Carbofuran P189-Carobsulfan	Contaminated debris is generated from plant laboratory and formulation activities. Items include laboratory pipettes and tubes, protective equipment, respirator cartridges, rags, empty containers, pallets, filters (i.e., for emissions controls) and any material contaminated with carbofuran. Material is stored in steel drums and in 1.4-cubic yard cardboard boxes.	20 tons	Acute Toxicity (Carbofuran and carbosulfan are cholinesterase-inhibiting. Atropine is an antidote.)	Protective equipment when handling includes safety glasses and impervious gloves. Keep off skin, avoid inhalation.

Routinely Generated Hazardous Waste					
Waste Name/Facility Waste Code	**Hazardous Waste Code(s)**	**Description**	**Estimated Daily Maximum Amount**	**Possible Hazards/ Special Treatment**	**Precautions & Personal Protective Equipment**
Carbofuran and/or Carbosulfan Empty Recyclable Containers	P127-Carbofuran or P189-Carobsulfan	Empty recyclable containers (i.e., drums, totes, invertabins) that contains residual carbofuran or carbosulfan	20 tons	Acute Toxicity (Carbofuran and carbosulfan are cholinesterase-inhibiting. Atropine is an antidote.)	Protective equipment when handling includes safety glasses and impervious gloves. Keep off skin, avoid inhalation.
Spent Lab Solvents (MHW 66)	D001–ignitable D022–chloroform F002–halogenated solvents F003–nonhalogenated solvents F005–nonhalogenated solvents	Generated from spent solvents used in laboratory analytical methods from Middleport Control labs. Material is liquid organic solvent and is collected and stored in a 55-gallon steel drum(s) in the Lab Solvent Shed storage area and in the Building 65 West Wall storage area.	1000 pounds	Ignitable, Toxic	Protective equipment when handling includes impervious gloves, safety glasses, and protective clothing. Keep off skin, avoid inhalation.
Spent Lab Solvents with Carbofuran and/or Carbosulfan	D001, D022, F002, F003, F005 P127-carbofuran P189-carbosulfan	Generated from spent solvents used in laboratory analytical methods from Middleport Control labs. Material is liquid organic solvent and is collected in a one-quart containers in Building 48 Lab and is stored in a 55-gallon steel drum in the Lab Solvent Shed storage area and in the Building 65 West Wall storage area.	1000 pounds	Ignitable, Acute Toxicity (Carbofuran and carbosulfan are cholinesterase-inhibiting. Atropine is an antidote)	Protective equipment when handling includes impervious gloves, safety glasses, and protective clothing. Keep off skin, avoid inhalation.

Routinely Generated Hazardous Waste					
Waste Name/Facility Waste Code	**Hazardous Waste Code(s)**	**Description**	**Estimated Daily Maximum Amount**	**Possible Hazards/ Special Treatment**	**Precautions & Personal Protective Equipment**
Waste Aerosols, Waste Paint	D001–ignitable, D035-methyl ethyl ketone	Generated from maintenance painting activities. Material is collected and stored in 55-gallon steel drums in the Building 65 West Wall storage area.	500 pounds	Ignitable Toxic	Protective equipment when handling includes gloves, safety glasses, and protective clothing.
Switches, Lights, Thermostats	D009- mercury	Generated from plant maintenance. Material is collected and stored in 55-gallon steel drums in the Building 65 West Wall storage area.	500 pounds	Toxic	Protective equipment when handling includes gloves, safety glasses, and protective clothing.
Contaminated Soils and/or Debris[1]	D004-arsenic	Generated from clean out of sludge in storage tanks (T-1101, T-1102, T-8100) and excavation of contaminated dirt and debris during remedial activities at the plant.	40 tons	Toxic	Protective equipment when handling includes impervious gloves and protective clothing to avoid skin contact and inhalation of material.
Contaminated Groundwater	D004-arsenic, D008-lead, F039-leachate	Generated from groundwater remedial systems, collected in tanks T-1101, T-1102 and T-8100 and treated at the on-site Water Treatment Plant and discharged pursuant to the facility SPDES permit	1.2 million gallons	Toxic	Protective equipment when handling includes impervious gloves and protective clothing to avoid skin contact and inhalation of material.
WTP Spent Activated Carbon	D004-arsenic, U080-methylene chloride, P127-carbofuran	Generated from water treatment plant (WTP). Material is activated carbon. It is transferred from tanks T-2001, T-2002, and/or T-2003 into bulk containers for off-site disposal	60 tons	Toxic (Carbofuran is cholinesterase-inhibiting. Atropine is an antidote.)	Protective equipment when handling includes impervious gloves and protective clothing to avoid skin contact and inhalation of material.

[1] May be subject to NYSDEC Contained-In Determination that the wastes will NOT require management as a hazardous waste.

Routinely Generated Hazardous Waste					
Waste Name/Facility Waste Code	**Hazardous Waste Code(s)**	**Description**	**Estimated Daily Maximum Amount**	**Possible Hazards/ Special Treatment**	**Precautions & Personal Protective Equipment**
The following WTP treatment wastes will be managed as a hazardous waste pending NYSDEC Contained-In Determination that the wastes will NOT require management as a hazardous waste					
WTP Spent Brine	D004-arsenic, U080-methylene chloride, P127-carbofuran	Spent brine from the regeneration of two ion exchange units in the WTP	40,000 gallons	Toxic	Protective equipment when handling, as appropriate
WTP Filter Cake	D004-arsenic, U080-methylene chloride, P127-carbofuran	Filter cake generated from the chemical precipitation process in the WTP.	60 tons	Toxic	Protective equipment when handling, as appropriate
WTP Spent Resin	D004-arsenic, U080-methylene chloride, P127-carbofuran	Spent resin generated from the Cation Exchange Vessels	60 tons	Toxic	Protective equipment when handling, as appropriate

Attachment B

FMC Middleport Facility Drawings

Figure 1 – Site Layout

Figure 2 – Material Storage Areas

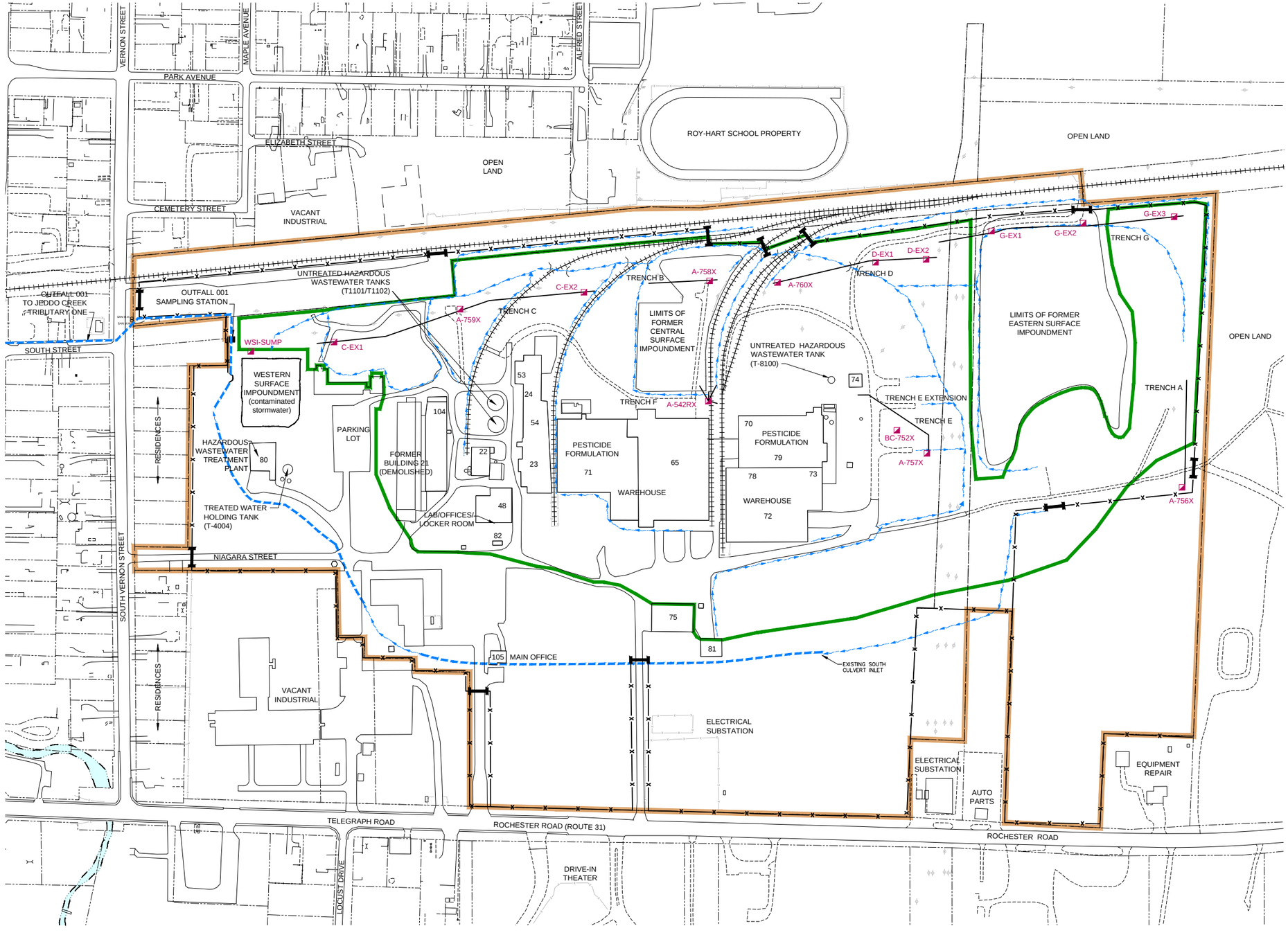
Figure 3 – Emergency Evacuation Assembly Areas

Evacuation Routes for Facility Buildings Figures

FM Global Drawing of Sprinklers and Water Supply

Water Treatment Plant Process Flow Diagrams

Calfran System Process Flow Diagram



LEGEND:

- APPROXIMATE PROPERTY LINE
- BUILDING
- 73 BUILDING NUMBER
- FACILITY PROPERTY BOUNDARY
- FACILITY FENCE
- FENCE GATE
- EXISTING SWALE/TRENCH DRAIN
- APPROXIMATE LOCATION OF BURIED CULVERT PIPE
- NORTH SITE COVER
- EXTRACTION WELL
- BLAST FRACTURED TRENCH

NOTE:

1. ALL LOCATIONS ARE APPROXIMATE.

No.	Building
22	Boiler House (Former)
23	Herbicide Formulation
24	Facet DF Formulation
48	Locker Room, QC Lab, Offices
53	Lube and Carpenter Shops
54	Warehouse/Pesticide Formulation
65	Warehouse
70	Carbofuran and Pesticide Formulation
71	Pesticide Formulation
72	Warehouse
73	Furadan Export
74	Hazardous Waste Groundwater Air Stripper
75	Maintenance Shop
78	Warehouse
79	Pesticide Formulation
80	Hazardous Wastewater Treatment Plant
81	Maintenance Shed
82	Laboratory Solvent Storage Shed
104	Warehouse
105	Main Office

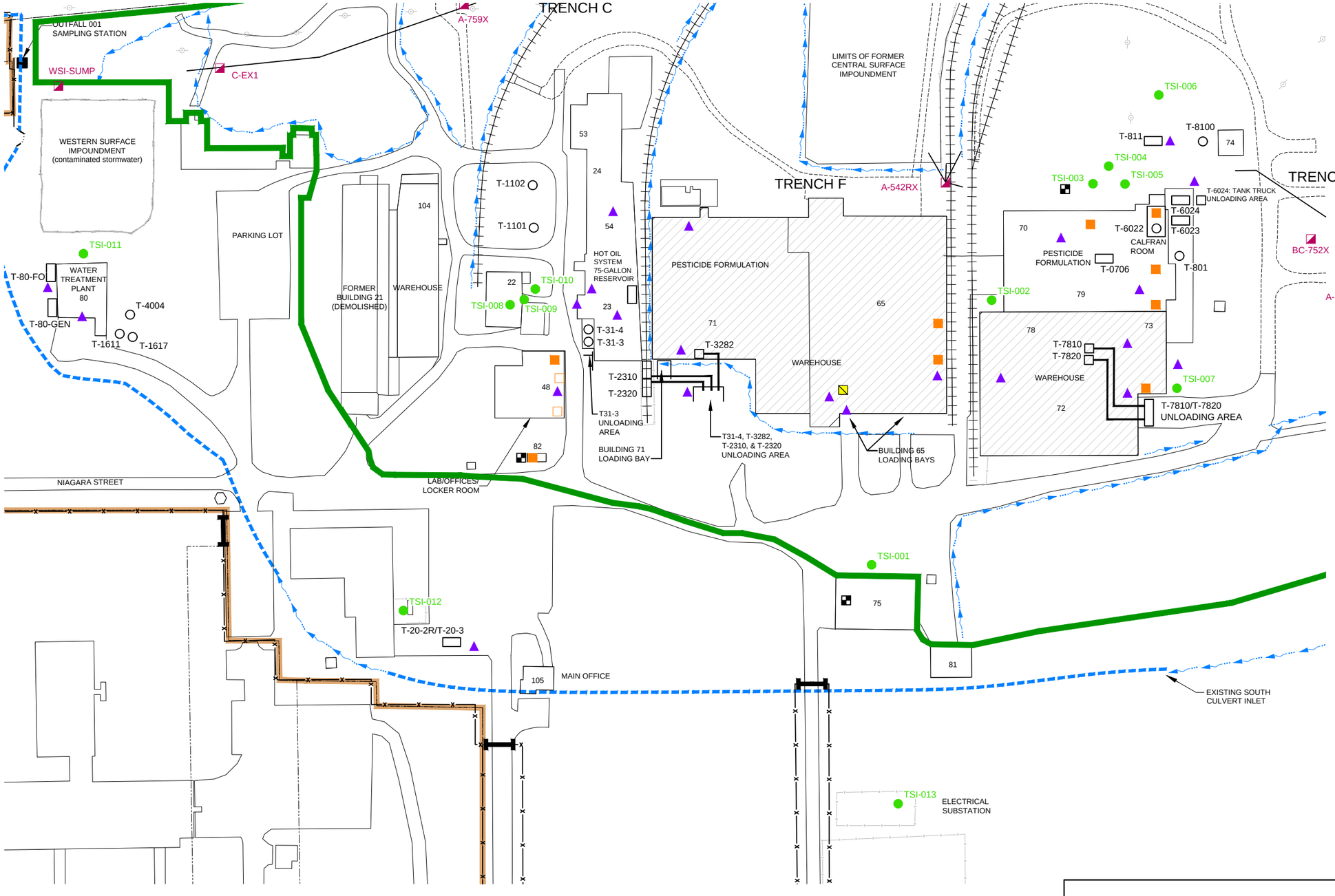
0 150' 300'
GRAPHIC SCALE

FMC CORPORATION
MIDDLEPORT, NEW YORK
CONTINGENCY PLAN

SITE LAYOUT

ARCADIS Design & Consultancy for natural and built assets

FIGURE
1



LEGEND:

- APPROXIMATE PROPERTY LINE
- BUILDING
- 73 BUILDING NUMBER
- FACILITY PROPERTY BOUNDARY
- FACILITY FENCE
- FENCE GATE
- EXISTING SWALE/TRENCH DRAIN
- APPROXIMATE LOCATION OF BURIED CULVERT PIPE
- NORTH SITE COVER
- EXTRACTION WELL
- BLAST FRACTURED TRENCH
- TANK TRANSFER PIPING (ABOVE GROUND)
- STORAGE AREAS OF OIL BLENDS IN VARIOUS PRODUCTS IN PORTABLE CONTAINERS > 55 GALLONS
- 90-DAY CENTRAL HAZARDOUS WASTE ACCUMULATION AREA
- SATELLITE HAZARDOUS WASTE ACCUMULATION AREA
- UNIVERSAL WASTE ACCUMULATION AREA
- OIL FILLED TRANSFORMER (> 55 GALLONS)
- SPILL KIT
- WINDSOCK

NOTE:

1. ALL LOCATIONS ARE APPROXIMATE.

Tank ID	Volume (Gallons)	Contents
T-20-2R	300	Gasoline
T-20-3	290	Diesel Fuel
T-31-3	10,300	Clomazone Technical
T-31-4	10,300	Aromatic 200
T-80-FO	1,000	#2 Fuel Oil
T-80-GEN	660	Diesel Fuel
T-0706	270	Mineral Oil
T-801	12,000	Propylene Glycol
T-811	300	Diesel Fuel
T-1101	600,000	Untreated Groundwater (Hazardous Waste)
T-1102	600,000	Untreated Groundwater (Hazardous Waste)
T-1611	12,000	Salt Saturator
T-1617	12,000	Spent Brine Wastewater
T-2310	12,500	Aromatic 100
T-2320	12,500	Aromatic 200
T-3282	5,000	Corn Oil
T-4004	45,000	Treated Water
T-6022	5,500	Hazardous Wastewater (Carbofuran/Carbosulfan)
T-6023	18,000	Hazardous Wastewater (Carbofuran)
T-6024	15,000	Mineral Oil
T-7810	9,600	Aromatic 100
T-7820	9,600	Aromatic 200
T-8100	43,000	Untreated Groundwater (Hazardous Waste)

0 80' 160'
GRAPHIC SCALE

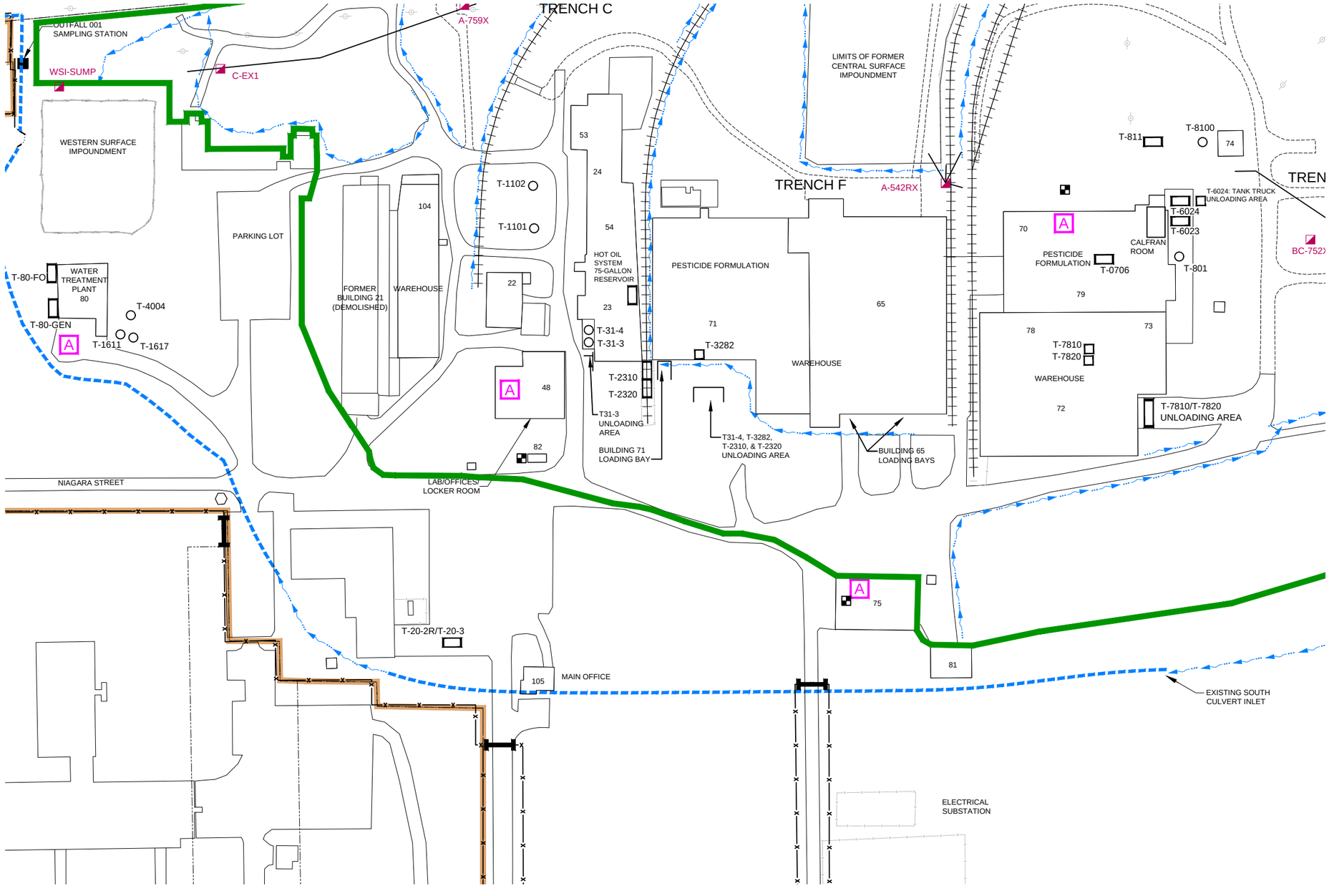
Note: Created from a figure prepared by Arcadis.

FMC CORPORATION
MIDDLEPORT, NEW YORK

GEI Consultants

Material Storage Areas

Project 1331210 | September 2020 | Figure 2



LEGEND:

- APPROXIMATE PROPERTY LINE
- BUILDING
- 73 BUILDING NUMBER
- FACILITY PROPERTY BOUNDARY
- FACILITY FENCE
- FENCE GATE
- EXISTING SWALE/TRENCH DRAIN
- APPROXIMATE LOCATION OF BURIED CULVERT PIPE
- NORTH SITE COVER
- EXTRACTION WELL
- BLAST FRACTURED TRENCH
- WINDSOCKS
- A ASSEMBLY AREA

NOTE:

1. ALL LOCATIONS ARE APPROXIMATE.

No.	Assembly Area
1	Bldg. 80 (WTP) office trailer
2	Bldg. 48 main lunch room
3	Bldg. 70 Furadan lunch room
4	Bldg. 75 maintenance lunch room

0 80' 160'
GRAPHIC SCALE

FMC CORPORATION
MIDDLEPORT, NEW YORK
CONTINGENCY PLAN

EMERGENCY EVACUATION ASSEMBLY AREAS

ARCADIS Design & Consultancy for natural and built assets

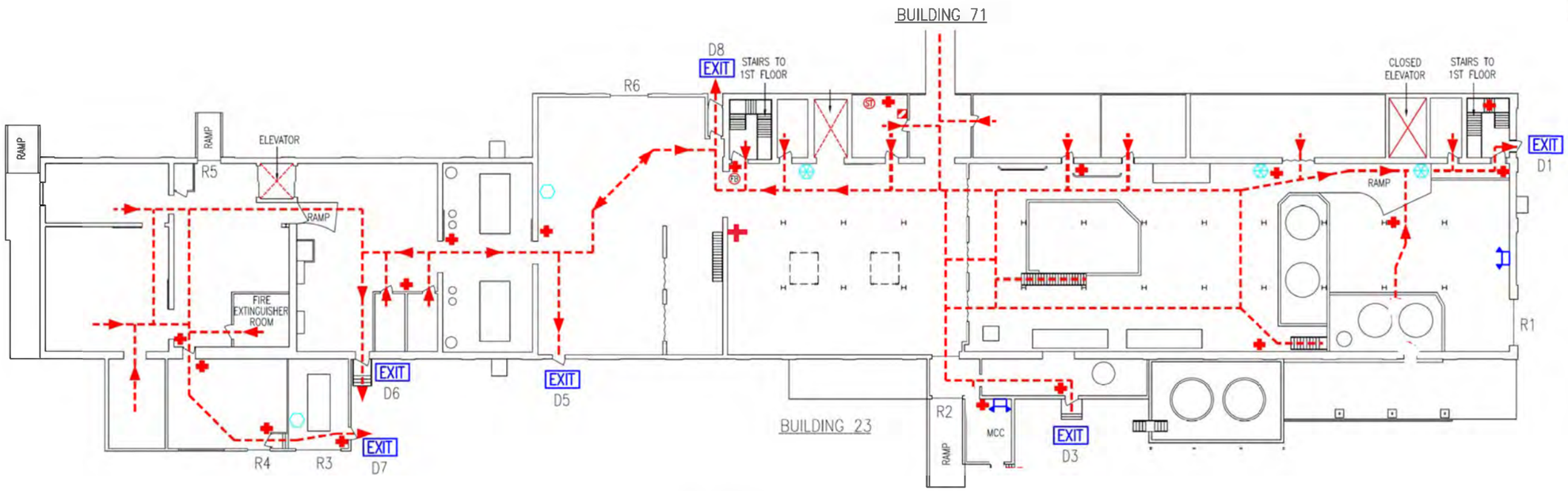
FIGURE
3

CITY: SYRACUSE, NY DIV/GROUP: EBC-IM/DV DB/LD: L.POSENAUER PM/TM: D.WRIGHT LYR:(Opt)ON=*;OFF=*REF*
C:\Users\lposenauer\OneDrive - ARCADIS\BIM 360 Docs\FMC CORP\2018 Technical Support\2018\B0037786.2018\01-DWG\FMC-CONTINGENCY_FIG 3_EM EVAC ASSEMBLY AREAS.dwg LAYOUT: 3 SAVED: 11/27/2018 10:55 AM ACADVER: 21.0S (LMS TECH) PAGESETUP: C-LD2B-PDF
PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 11/27/2018 10:57 AM BY: POSENAUER, LISA
XREFS: IMAGES:
FMC_X-BASE

N

FMC

LEGEND	
EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
PH	EMERGENCY PHONE
	SINGLE EMERGENCY LIGHT
	DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
SK	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)



PLAN
SCALE: 1/16"=1'-0"

MARK	DESCRIPTION	DATE	BY	CHK.
0	ORIGINAL RELEASE	12/09/13	TD	JV

REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

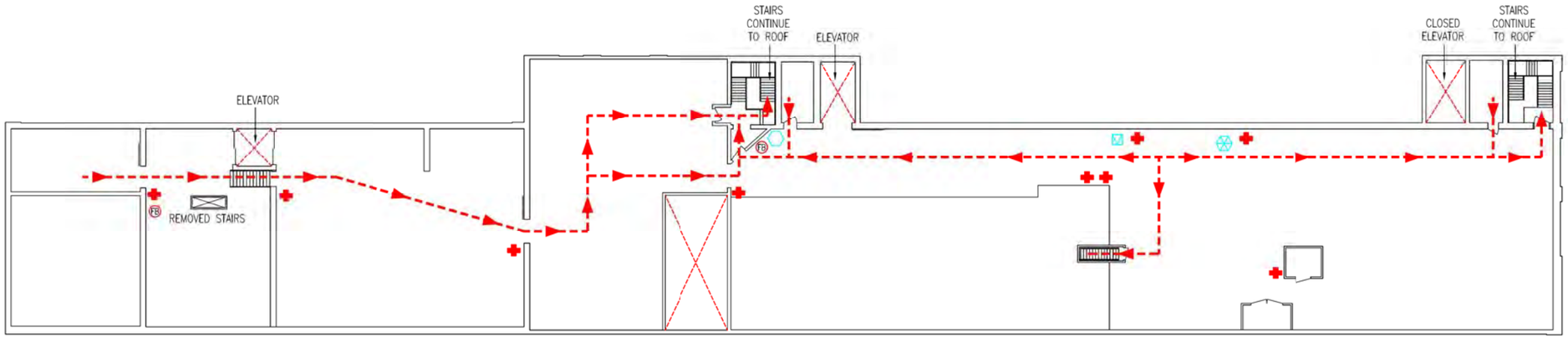
MIDDLEPORT PLANT
BUILDING 23
PLAN – GROUND FLOOR
EVACUATION ROUTES &
SAFETY EQUIPMENT LOCATION

DRAWN: TJD — DATE: 4/23/13
SCALE: AS NOTED — JOB NO.:
APPROVED: — SHEET NO.: 1 OF 2

DRAWING NO.
BUILDING 23–001

ATSI
www.ATSI.com

LEGEND	
EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
PH	EMERGENCY PHONE
	SINGLE EMERGENCY LIGHT
	DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)



PLAN
SCALE: 1/16"=1'-0"

MARK	DESCRIPTION	DATE	BY	CHK.
0	ORIGINAL RELEASE	12/09/13	TD	JV

REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

MIDDLEPORT PLANT
BUILDING 23
PLAN – 1ST FLOOR
EVACUTATION ROUTES &
SAFETY EQUIPMENT LOCATION

DRAWN: TJD | DATE: 4/23/13
SCALE: AS NOTED | JOB NO.:
APPROVED: | SHEET NO.: 2 OF 2

DRAWING NO.
BUILDING 23–001

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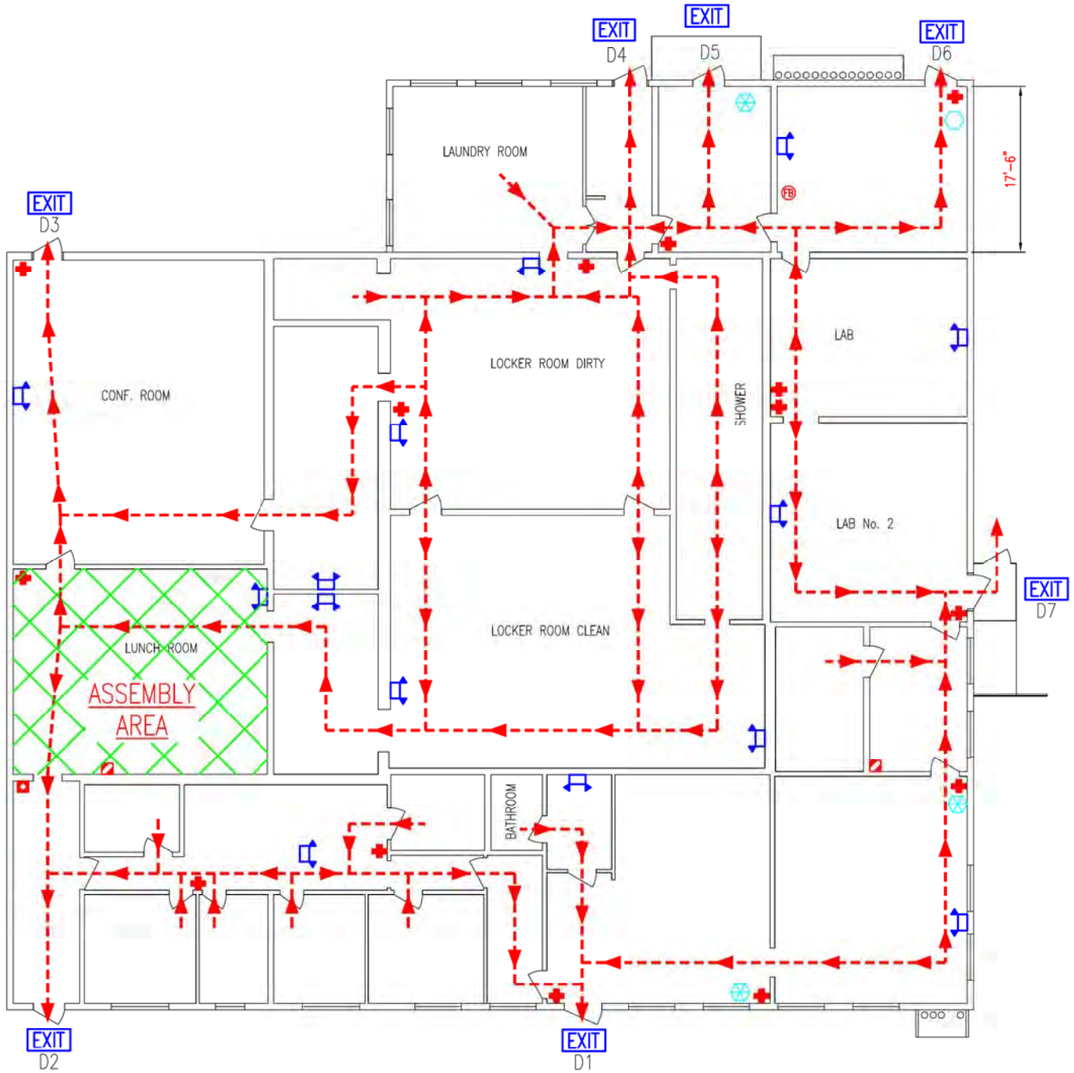
N

FMC



PLAN
SCALE: 1/8"=1'-0"

LEGEND

EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
PH	EMERGENCY PHONE
	SINGLE EMERGENCY LIGHT
	DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
	EMERGENCY DEFIBRILLATOR
ST	STRETCHER
FB	FIRE BLANKET
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)

MARK	DESCRIPTION	DATE	BY	CHK.
0	ORIGINAL RELEASE	12/09/13	TD	JV

REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

MIDDLEPORT PLANT
BUILDING 48
PLAN – GROUND FLOOR
EVACUATION ROUTES &
SAFETY EQUIPMENT LOCATION

DRAWN: TJD | DATE: 4/23/13
SCALE: AS NOTED | JOB NO.:
APPROVED: | SHEET NO.: 1 OF 1

DRAWING NO.
BUILDING 48–001

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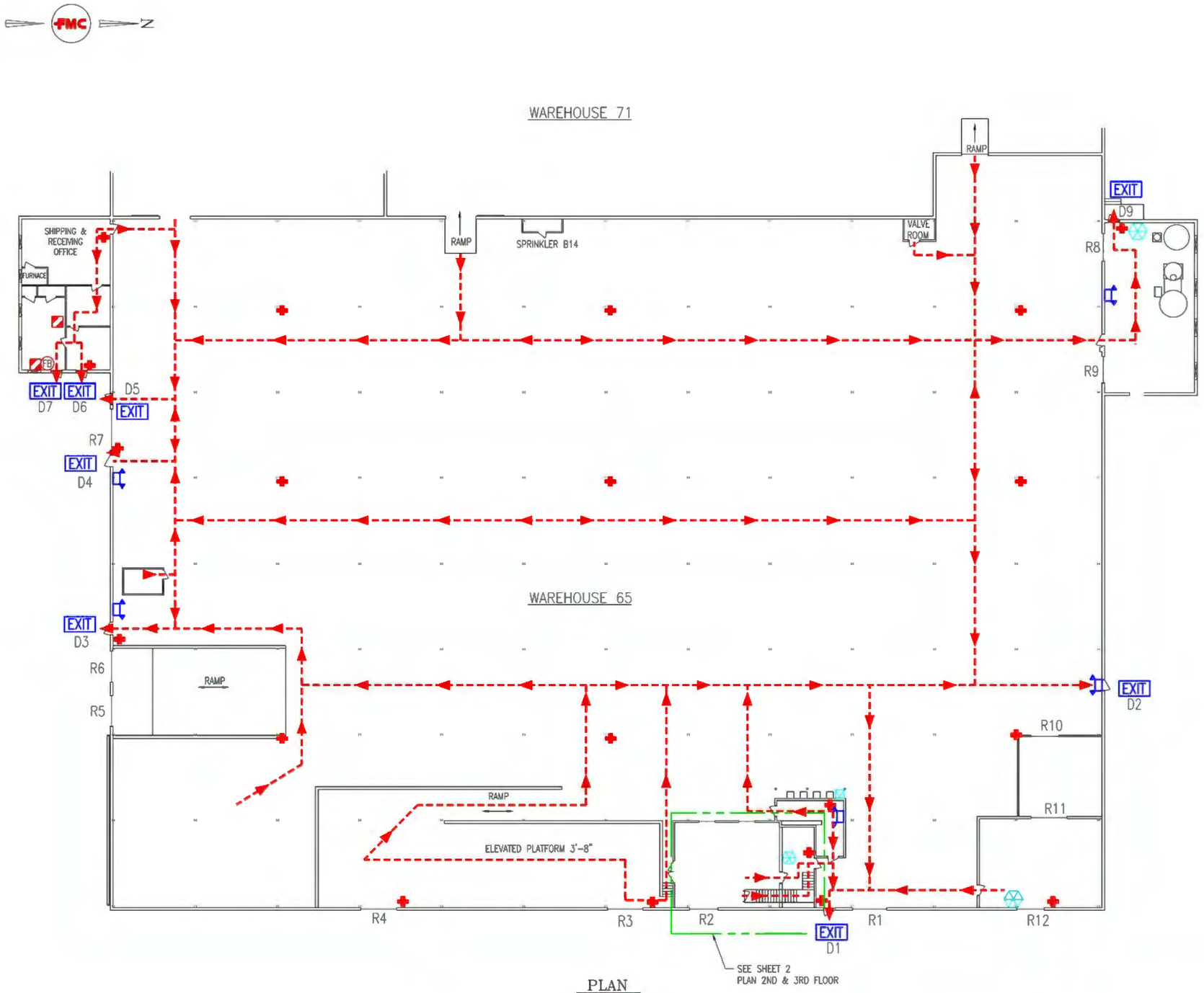

PLAN
SCALE: 1/16"=1'-0"

LEGEND	
EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
PH	EMERGENCY PHONE
	SINGLE EMERGENCY LIGHT
	DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)

MARK	DESCRIPTION	DATE	BY	CHK.
0	ORIGINAL RELEASE	12/09/13	TD	AY

REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

MIDDLEPORT PLANT
BUILDING 65
PLAN – GROUND FLOOR
EVACUATION ROUTES &
SAFETY EQUIPMENT LOCATION

DRAWN: TJD | DATE: 4/23/13
SCALE: AS NOTED | JOB NO.:
APPROVED: | SHEET NO.: 1 OF 2

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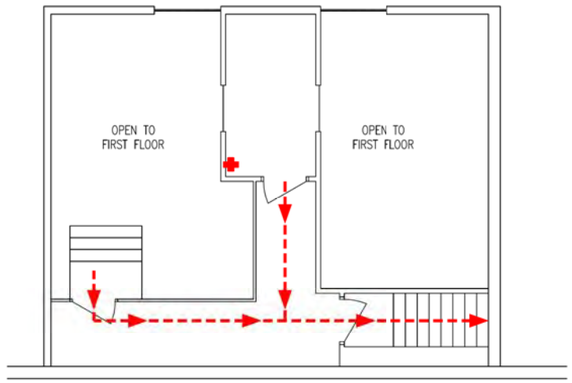
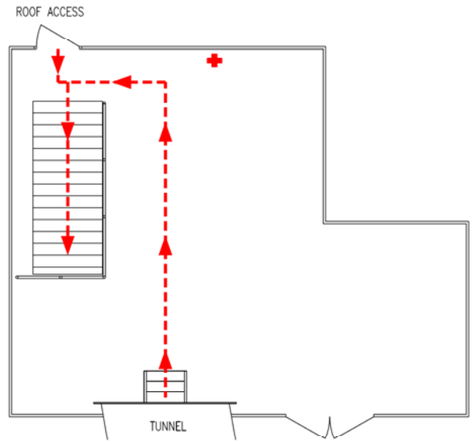
DRAWING NO.
BUILDING 65–001



PLAN 1st FLOOR
SCALE: 3/16"=1'-0"



PLAN 2nd FLOOR
SCALE: 3/16"=1'-0"

LEGEND	
EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
	EMERGENCY PHONE
	SINGLE / DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)

MARK	DESCRIPTION	DATE	BY	CHK.
0	ORIGINAL RELEASE	12/09/13	TD	JV

REVISIONS

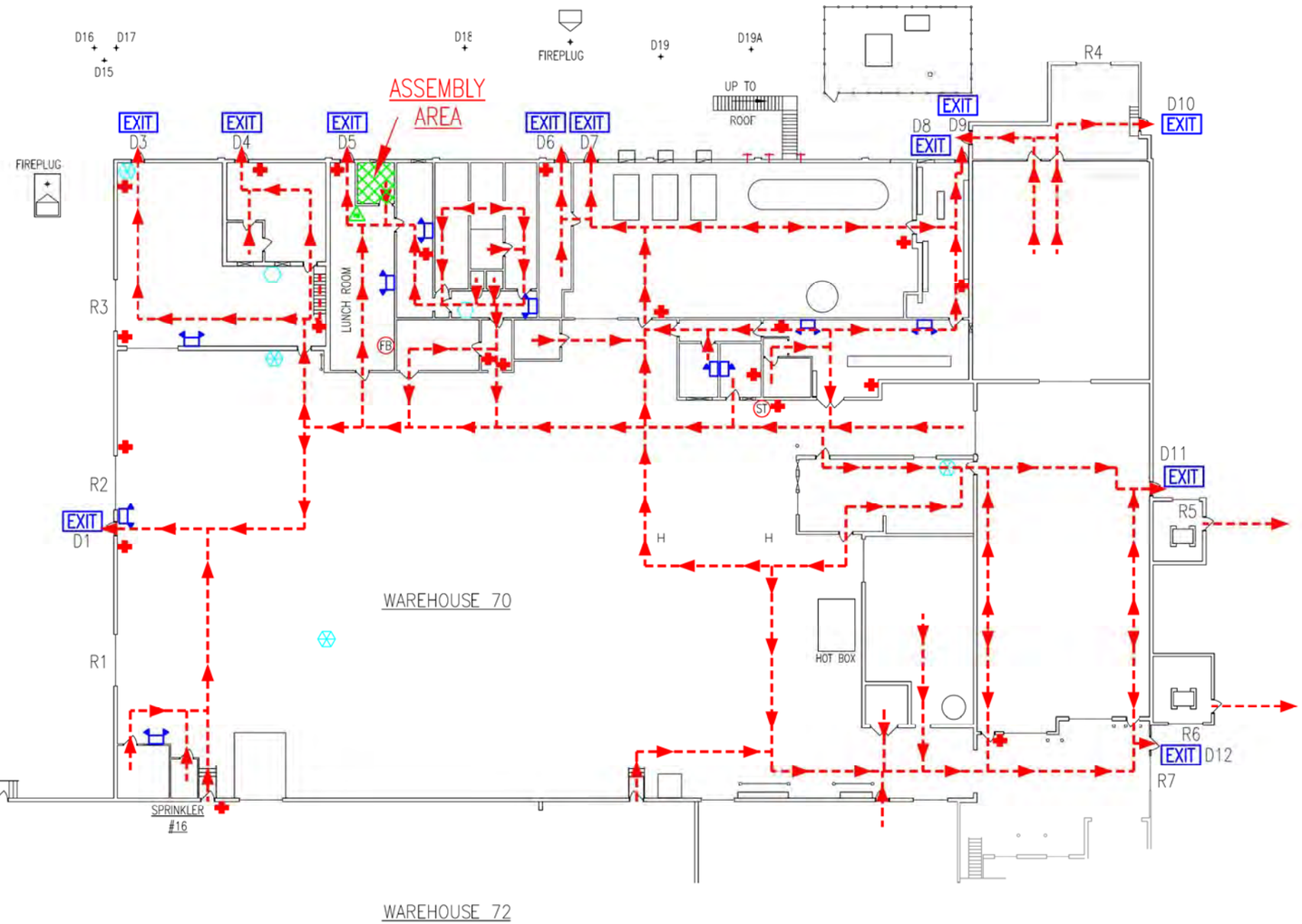
FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS	MIDDLEPORT PLANT
	BUILDING 65
	PLAN 1ST & 2ND FLOOR
	EVACUATION ROUTES &
	SAFETY EQUIPMENT LOCATION
DRAWN: TJD	DATE: 4/23/13
SCALE: AS NOTED	JOB NO.:
APPROVED:	SHEET NO.: 2 OF 2

DRAWING NO.
BUILDING 65-001

N

FMC



PLAN
SCALE: 1/16"=1'-0"

LEGEND	
EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
PH	EMERGENCY PHONE
	SINGLE / DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)

EVACUATION ASSEMBLY AREA

MARK	DESCRIPTION	DATE	BY	CHK.
0	ORIGINAL RELEASE	12/09/13	TD	JV

REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

MIDDLEPORT PLANT
BUILDING 70
PLAN – GROUND FLOOR
EVACUATION ROUTES &
SAFETY EQUIPMENT LOCATIONS

DRAWN: TJD | DATE: 4/23/13
SCALE: AS NOTED | JOB NO.:
APPROVED: | SHEET NO.: 1 OF 1

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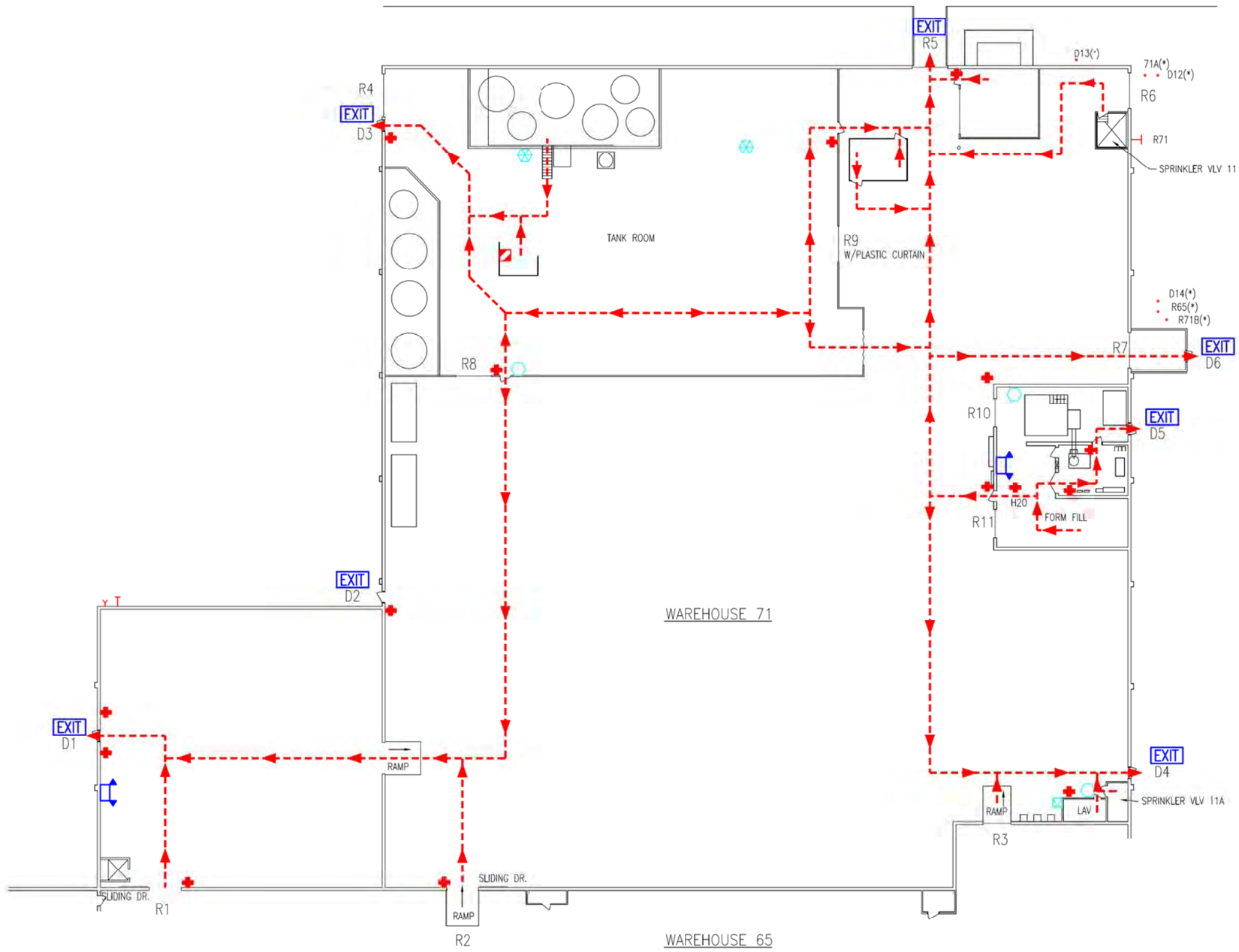
DRAWING NO.
BUILDING 70–001

BUILDING 23



PLAN
SCALE: 1/16"=1'-0"

LEGEND	
EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
PH	EMERGENCY PHONE
	SINGLE / DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)

(*) VALVES

MARK	DESCTIPTION	DATE	BY	CHK.
0	ORIGINAL RELEASE	12/09/13	TD	JV

REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

MIDDLEPORT PLANT
BUILDING 71
PLAN – GROUND FLOOR
EVACUATION ROUTES &
SAFETY EQUIPMENT LOCATION

DRAWN: TJD | DATE: 4/23/13
SCALE: AS NOTED | JOB NO.:
APPROVED: | SHEET NO.: 1 OF 1

DRAWING NO.
BUILDING 71–001

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FMC

BUILDING 70

WAREHOUSE 72

HOT BOX

R78 EXIT D7

R3

R2

R1

EXIT D1

EXIT D2

EXIT D3

EXIT D4

EXIT D5

EXIT D6

R6

R5

R4

TRUCK LOADING RAMP

FLAMABLE STORAGE

SPRINKLER BLDG

PLAN
SCALE: 1/16"=1'-0"

LEGEND	
EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
PH	EMERGENCY PHONE
	SINGLE / DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
	FENCE
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)

EVACUATION ASSEMBLY AREA

MARK	DESCRIPTION	DATE	BY	CHK.
0	ORIGINAL RELEASE	12/09/13	TD	JV

REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

MIDDLEPORT PLANT
BUILDING 72
PLAN – GROUND FLOOR
EVACUATION ROUTES &
SAFETY EQUIPMENT LOCATIONS

DRAWN: TJD DATE: 4/23/13
SCALE: AS NOTED JOB NO.:
APPROVED: SHEET NO.: 1 OF 1

DRAWING NO.
BUILDING 72–001

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7/28/13 TD

N

FMC

EXIT D4

EXIT D5

R1

R2

R3

EXIT D6

ASSEMBLY AREA

LUNCH ROOM

TRUCK REPAIR

VENT

EXIT D3

EXIT D2

UTILITY ROOM

CLEAN LOCKERS

LAVATORY

SHOWERS

DIRTY LOCKERS

SHOP FLOOR

R4

EXIT D1

EXIT D8

LAVATORY

CONFERENCE RM

OFFICE

OFFICE

OFFICE

PAINT & WELDING HOOD

EXIT D7

LEGEND

EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
PH	EMERGENCY PHONE
	SINGLE / DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
	EMERGENCY STOP
	STEEL GRATING
	UPPER LEVEL
	FENCE
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)

EVACUATION ASSEMBLY AREA

GROUND FLOOR
SCALE: 3/16"=1'-0"

MARK	DESCRIPTION	DATE	BY	CHK.
0	ORIGINAL RELEASE	12/09/13	TD	JV

REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

MIDDLEPORT PLANT
BUILDING 75
PLAN – GROUND FLOOR
EVACUATION ROUTES &
SAFETY EQUIPMENT LOCATION

DRAWN: RJB DATE: 4/23/13
SCALE: AS NOTED JOB NO.:
APPROVED: SHEET NO.: 1 OF 2

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DRAWING NO.
BUILDING 75–001

TD 7/26/13

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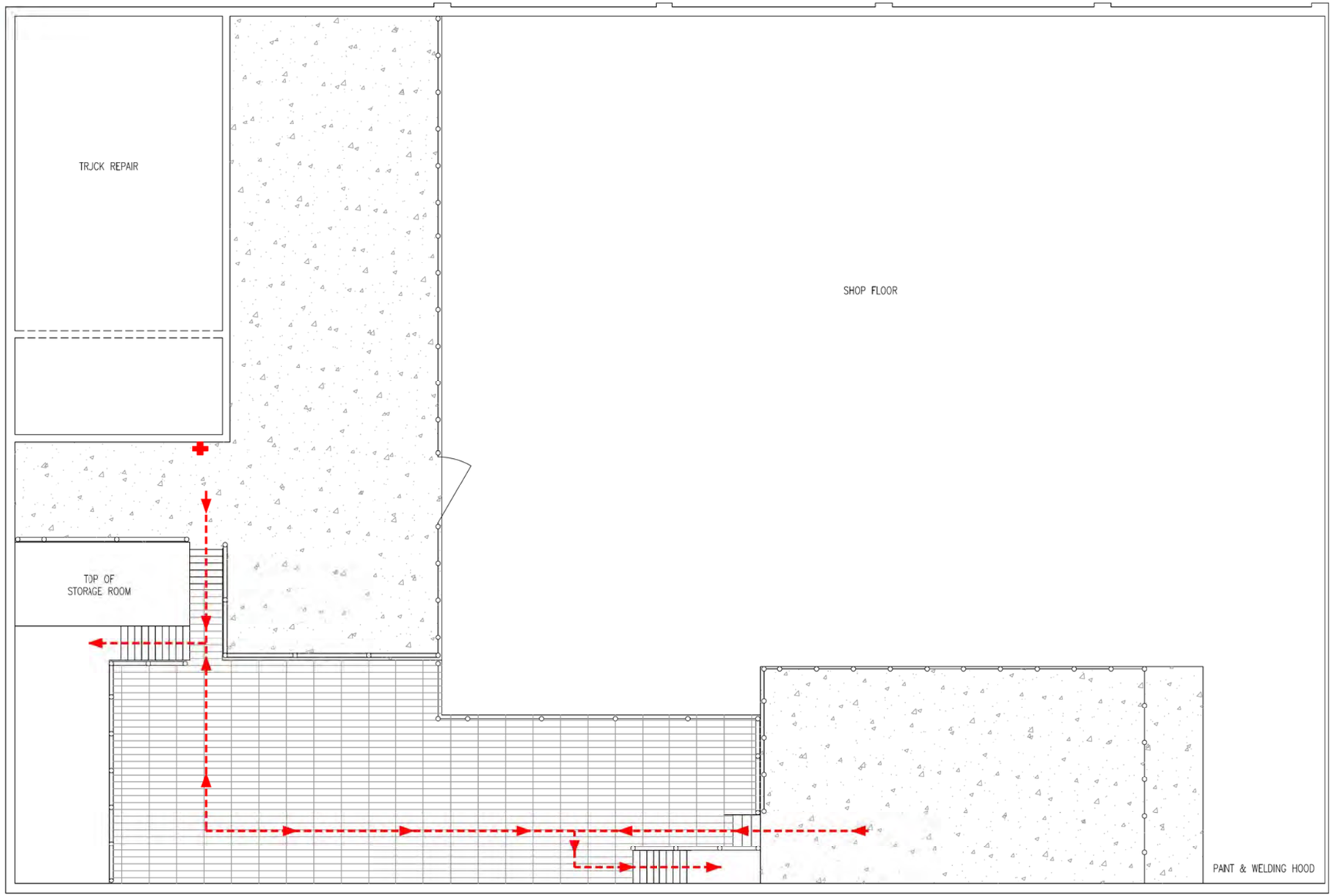

PLAN–UPPER LEVEL
SCALE: 3/16"=1'–0"

LEGEND

EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
PH	EMERGENCY PHONE
	SINGLE / DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
	EMERGENCY STOP
	STEEL GRATING
	UPPER LEVEL
	FENCE
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL–UP)

MARK	DESCRIPTION	DATE	BY	CHK.
0	ORIGINAL RELEASE	12/09/13	TD	JV

REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

MIDDLEPORT PLANT
BUILDING 75
MAINTENANCE–UPPER LEVEL
EVACUATION ROUTES &
SAFETY EQUIPMENT LOCATION

DRAWN: RJB | DATE: 4/23/13
SCALE: AS NOTED | JOB NO.:
APPROVED: | SHEET NO.: 2 OF 2

DRAWING NO.
BUILDING 75–001

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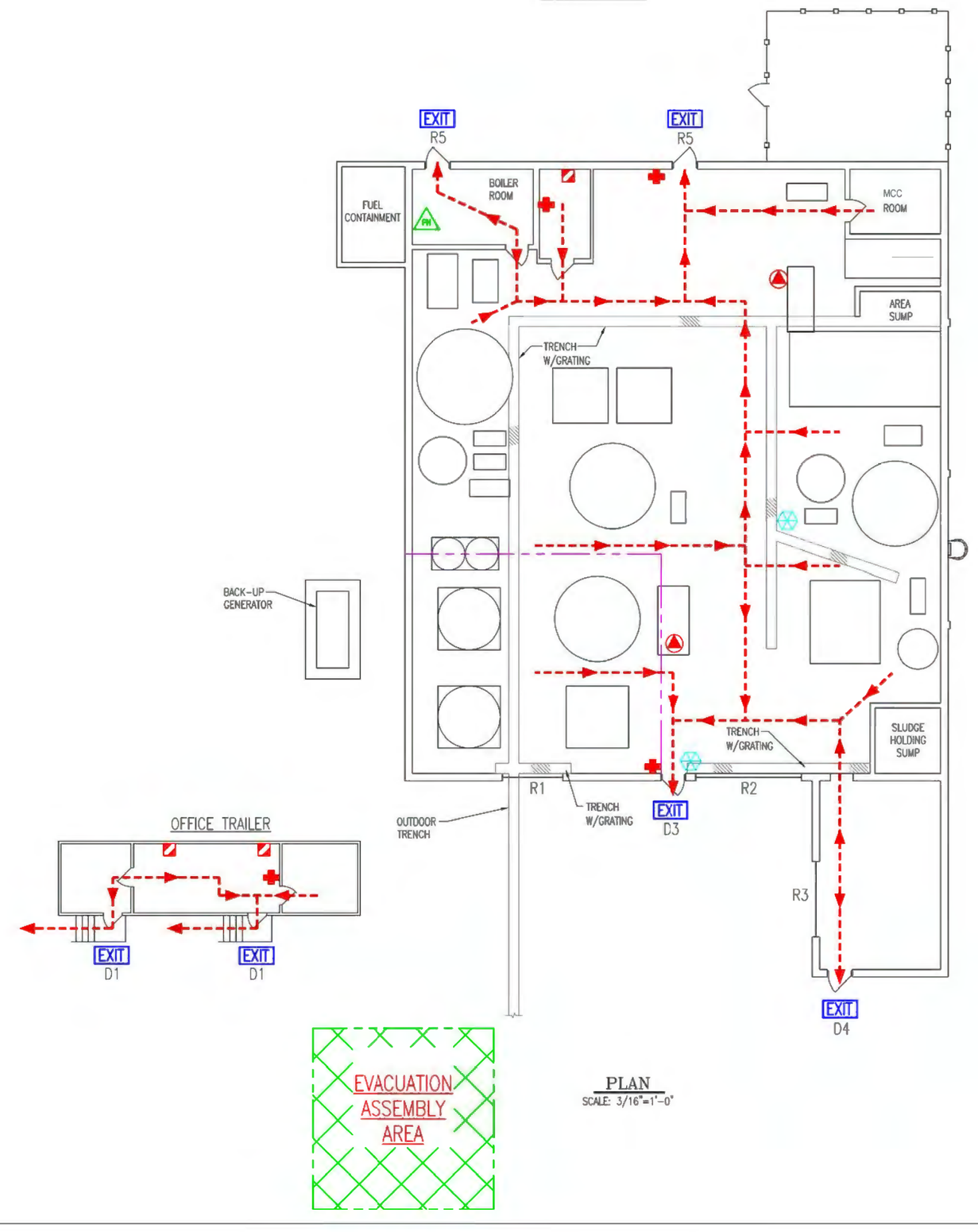
RETAINING POND



PLAN
SCALE: 3/16"=1'-0"

LEGEND

EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
PH	EMERGENCY PHONE
	SINGLE / DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
	EMERGENCY STOP
	STEEL GRATING
	UPPER LEVEL
	FENCE
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)

MARK	DESCRIPTION	DATE	BY	CHK.
0	ORIGINAL RELEASE	12/09/13	TD	JV

REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

MIDDLEPORT PLANT
BUILDING 80
WATER TREATMENT PLANT
EVACUATION ROUTES &
SAFETY EQUIPMENT LOCATION

DRAWN: RJB | DATE: 5/30/13
SCALE: AS NOTED | JOB NO.:
APPROVED: | SHEET NO.: 1 OF 1

DRAWING NO.
BUILDING 80-001

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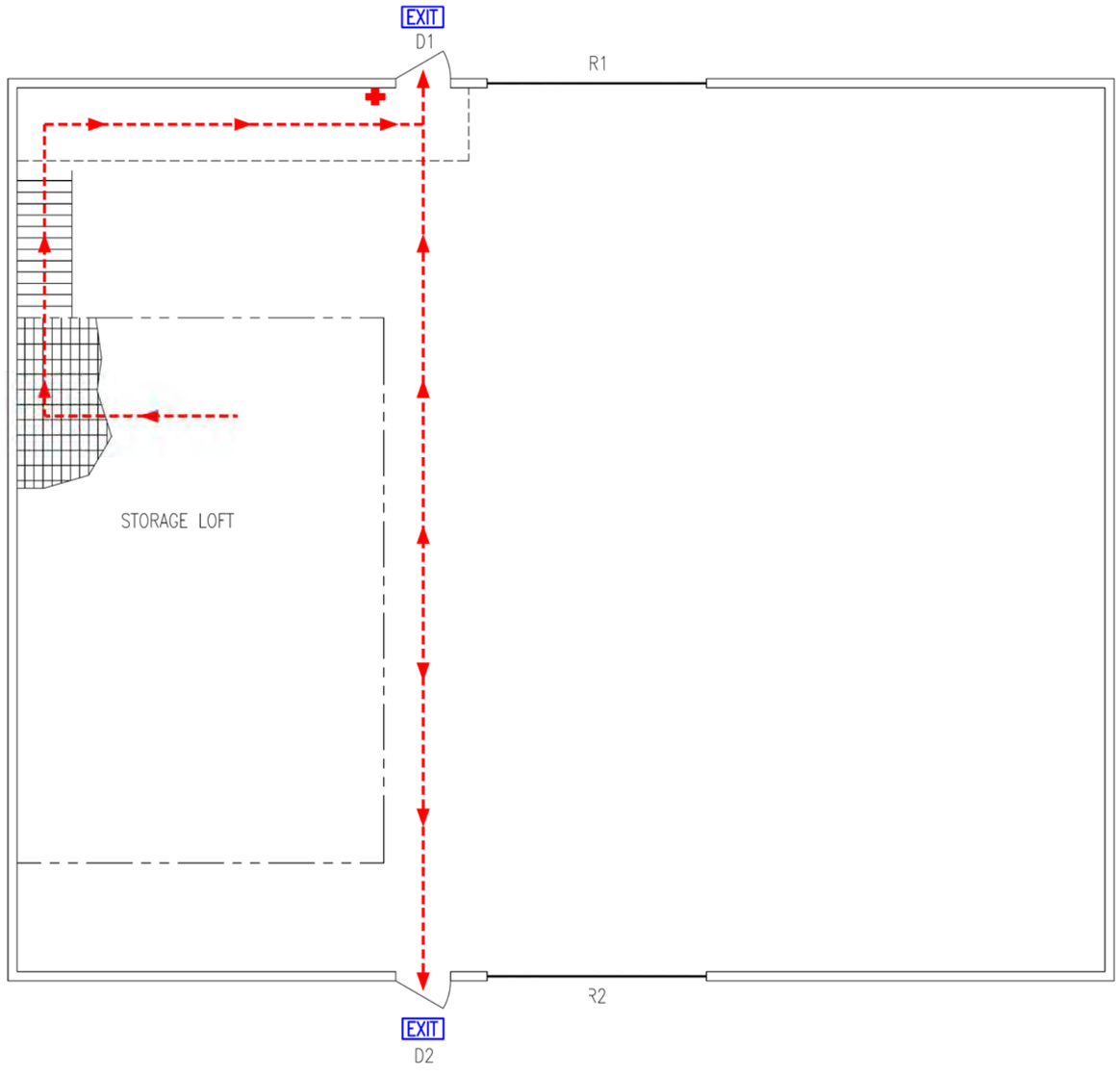
EVACUATION ASSEMBLY AREA



PLAN
SCALE: 1/4"=1'-0"

LEGEND	
EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
	EMERGENCY PHONE
	SINGLE / DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)

MARK	DESCRIPTION	DATE	BY	CHK.
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REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

MIDDLEPORT PLANT
BUILDING 81
PLAN – GROUND FLOOR
EVACUATION ROUTES &
SAFETY EQUIPMENT LOCATION

DRAWN: TJD | DATE: 4/23/13
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DRAWING NO.
BUILDING 81–001

TD 7/28/13 Q:\acad\FMC Middleport\86570\Contract Dwgs\BUILDING 81-00'.dwg Dec 09 2013 @ 1:37pm Release 17.2s by DAUPHINEE

N

FMC

EXIT
D3

STORAGE

SERVER ROOM

OFFICE

LUNCH ROOM

OFFICE

BATHROOM

CONFERENCE ROOM

EMERGENCY
COMMAND
CENTER

EXIT
D2

SIGN IN

CONTROL ROOM

OFFICE

STORAGE ROOM

EXIT
D1
MAIN ENTRANCE

EVACUATION
ASSEMBLY
AREA

PLAN
3/8"=1'-0"

LEGEND	
EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
	EMERGENCY PHONE
	SINGLE / DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)

MARK	DESCRIPTION	DATE	BY	CHK.
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REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

MIDDLEPORT PLANT
MAIN OFFICE/SECURITY BLD
PLAN – GROUND FLOOR
EVACUATION ROUTES &
SAFETY EQUIPMENT LOCATION

DRAWN: TJD | DATE: 4/23/13
SCALE: AS NOTED | JOB NO.:
APPROVED: | SHEET NO.: 1 OF 1

DRAWING NO.
MAIN OFFICE–001

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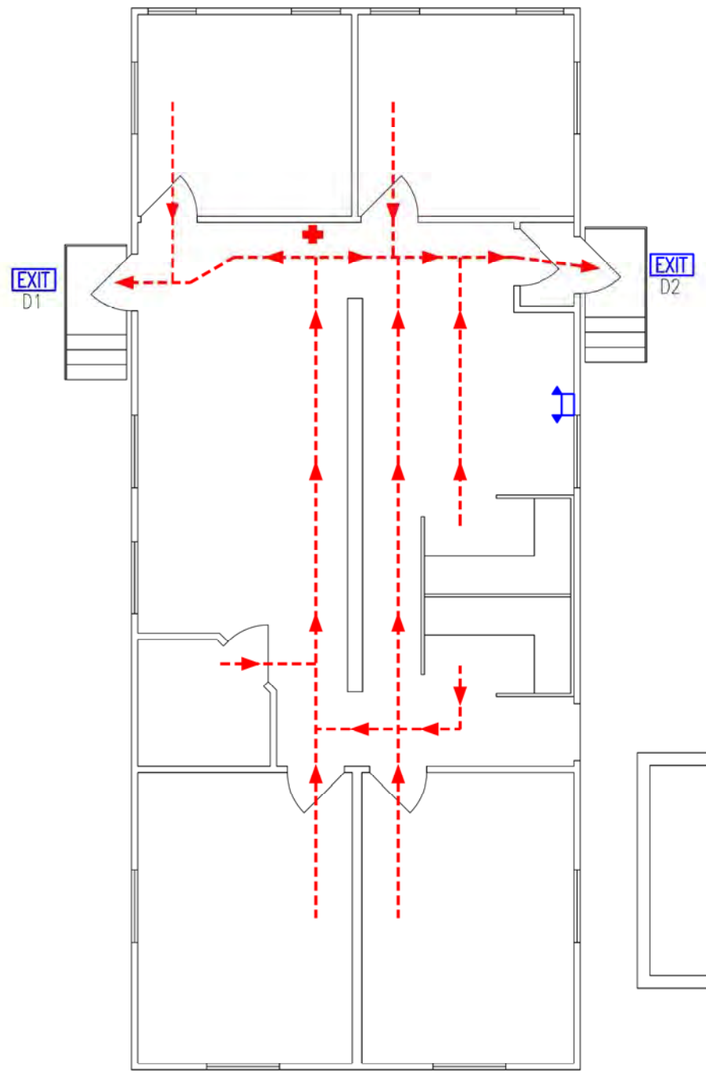
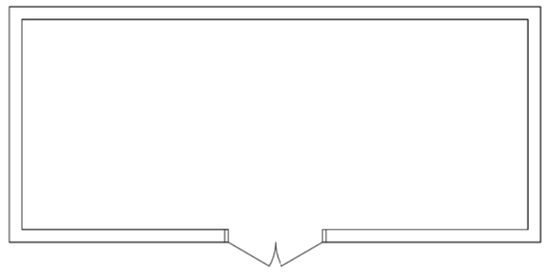
N





PLAN
SCALE: 1/4"=1'-0"

LEGEND	
EXIT	FIRE EXIT DOOR
	FIRE EXTINGUISHER
	EYE WASH STATION
	EYE WASH/SHOWER STATION
	EMERGENCY PHONE
	SINGLE / DOUBLE EMERGENCY LIGHT
	EVACUATION ROUTE
	FIRST AID KIT
	EMERGENCY SPILL KIT
ST	STRETCHER
FB	FIRE BLANKET
D #	WALK IN DOOR
R #	OVERHEAD DOOR (ROLL-UP)

MARK	DESCRIPTION	DATE	BY	CHK.
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REVISIONS

FMC Corporation
Agricultural Chemical Group
Middleport, New York 14105

REFERENCE DRAWINGS

MIDDLEPORT PLANT
TRAILER
PLAN – GROUND FLOOR
EVACUATION ROUTES &
SAFETY EQUIPMENT LOCATION

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DRAWING NO.
TRAILER–001

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FM Global

LEGEND

- Alarm check valve
- Check valve (Detector check in back flow preventer, exists exclusive)
- Fire department pumper connection.
- Automatic sprinkler point of distribution.
- Point of distribution of open sprinklers
- Dry pipe valve with quick opening device.
- Gate valve, non-indicating stem or relief valve.
- Hose connections
- Dry or Wet combi-riphant with fire department pumper connection (Where more indicate number of these outlets)
- Inspectorly test valve
- Outside screw and yoke valve (OS&Y)
- Indicator post (glass, post indicator valve assembly or indicating butterfly valve.
- Fire service meter
- Wall type BFP.
- Elevation of Sprinkler/nozzle in all floors/any pressure envelopes.
- Elevation of Sprinkler/nozzle by fire walls (per fire doors).

All dimensions are given in feet unless otherwise noted.
Site topographical settings are approximate.
Verify all field conditions noted.

TANK NOTE

No	CAPACITY	CONTENTS
21-1	18,000 Gal	Fuel Oil
21-2	18,000 Gal	Fuel Oil
21-3	10,000 Gal	Fuel Oil
21-5	15,000 Gal	Laminated Tech Actives
21-4	15,000 Gal	Aromatic 200
47-7	6,742 Gal	Empty
1-47-7	720 Gal	Empty
5-8002	10,000 Gal	Empty
5-8025	12,720 Gal	Waste Water
5-8024	14,000 Gal	Oil
1-441	12,000 Gal	Propylene Glycol
5-439	600 Gal	Water
5-434	600 Gal	Water

SPRINKLER SYSTEM DATA

RISER/LOCATION	HYDRAULIC & EXISTING SYSTEM DATA						
	Year Tested	Class	Static (psi)	Residual (psi)	Flow (gpm)	Pressure (psi)	
Bldg (no.21) thru 4-201					4,000	65	
Bldg (no.21) thru 1-689					1,000	75	

CHECKED IN RACHEL HYDRO (7.0/10)

REVISIONS

DR	CH	DATE	CHANGES MADE
mm		Aug 1-4-92	Put obsolete Work Orders on NO. 7 / Interview, CP- Dec 1992
AH		Jan 5-93	Put Sidewalk Work Schedule on 10 or 3 Hooper Dec. 93-02
KC		May 2-94	Put 6 Reg Loop on P.L.1. Monday, April 19-94
LS		Mar 1-95	Put 5 Reg Loop on P.L.1 Hooper, Sep 13-95
PAC		11-21-96	Put 4 Reg Loop on W. J. Dec/mo, 10-9-96
JAS		10-6-98	Put 4 Reg Loop on P.L.1 Lawson & 4-10-98

SKETCH
PIPING & VALVES IN VALVE HO
Not to Scale

FMC Corporation
"Agricultural Chemical Group"
Middleport, New York

Sketch from C.A. Laurent
November 22, 1996

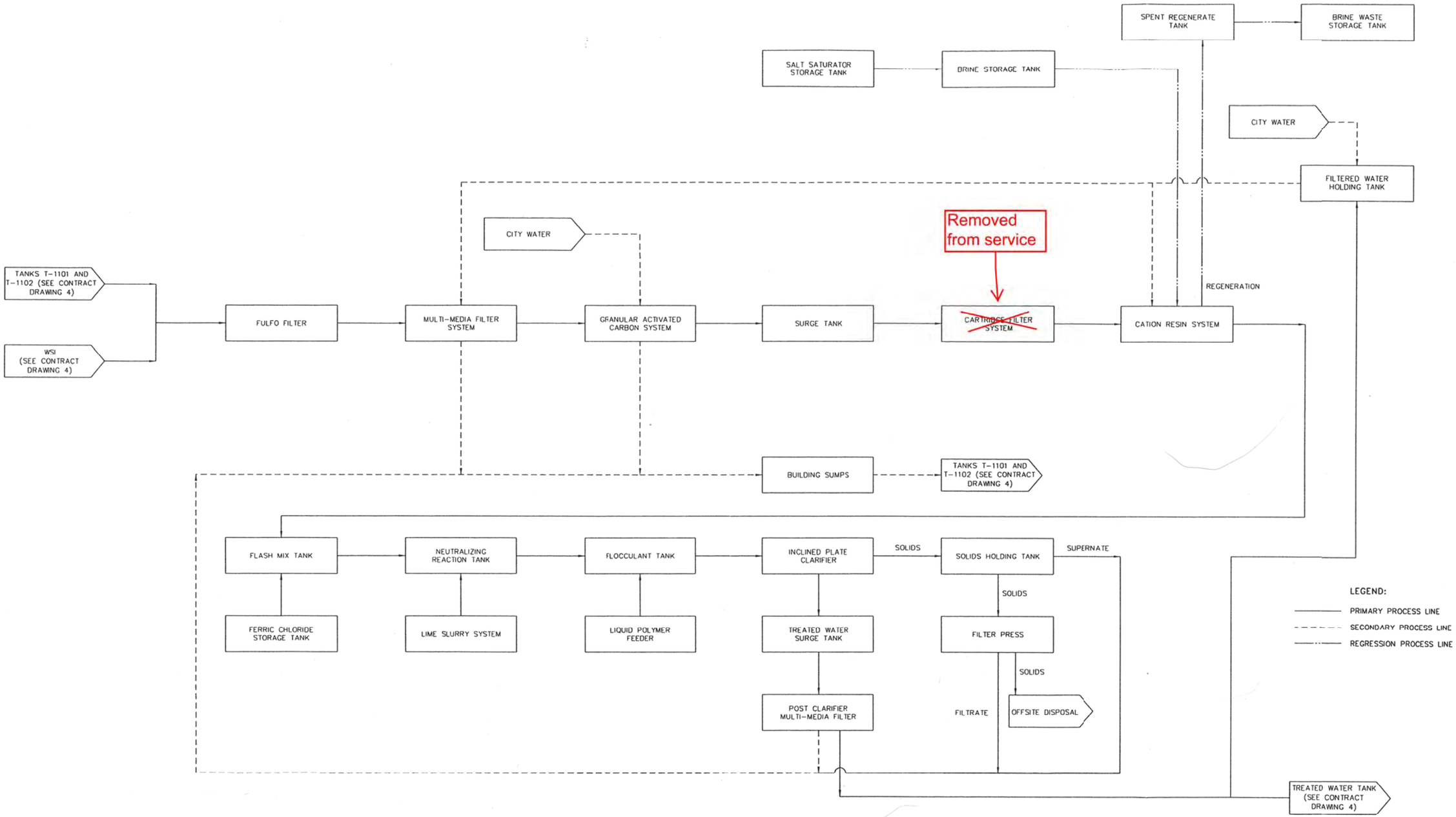
Scale: 1in = 80ft
By: L. DeMase

FACTORY MUTUAL INSURANCE COMPANY
Engineering Plan Services

INDEX
27744.10

1/1

Drawing Developed By ENGINEERING PLAN SERVICES



NOT TO SCALE

THIS BAR REPRESENTS ONE INCH ON THE ORIGINAL DRAWING. USE TO VERIFY FIGURE REPRODUCTION SCALE

No.	Date	Revisions	By	Ckd

Professional Engineer's Name: DAVID R. GERBER
Professional Engineer's No.: 073001

State	Date Signed	Project Mgr.
NY		TEM
Designed by	Drawn by	Checked by
MMP	KLS	

ARCADIS

ARCADIS OF NEW YORK, INC.

FMC CORPORATION • MIDDLEPORT, NEW YORK
WATER TREATMENT PLANT UPGRADE

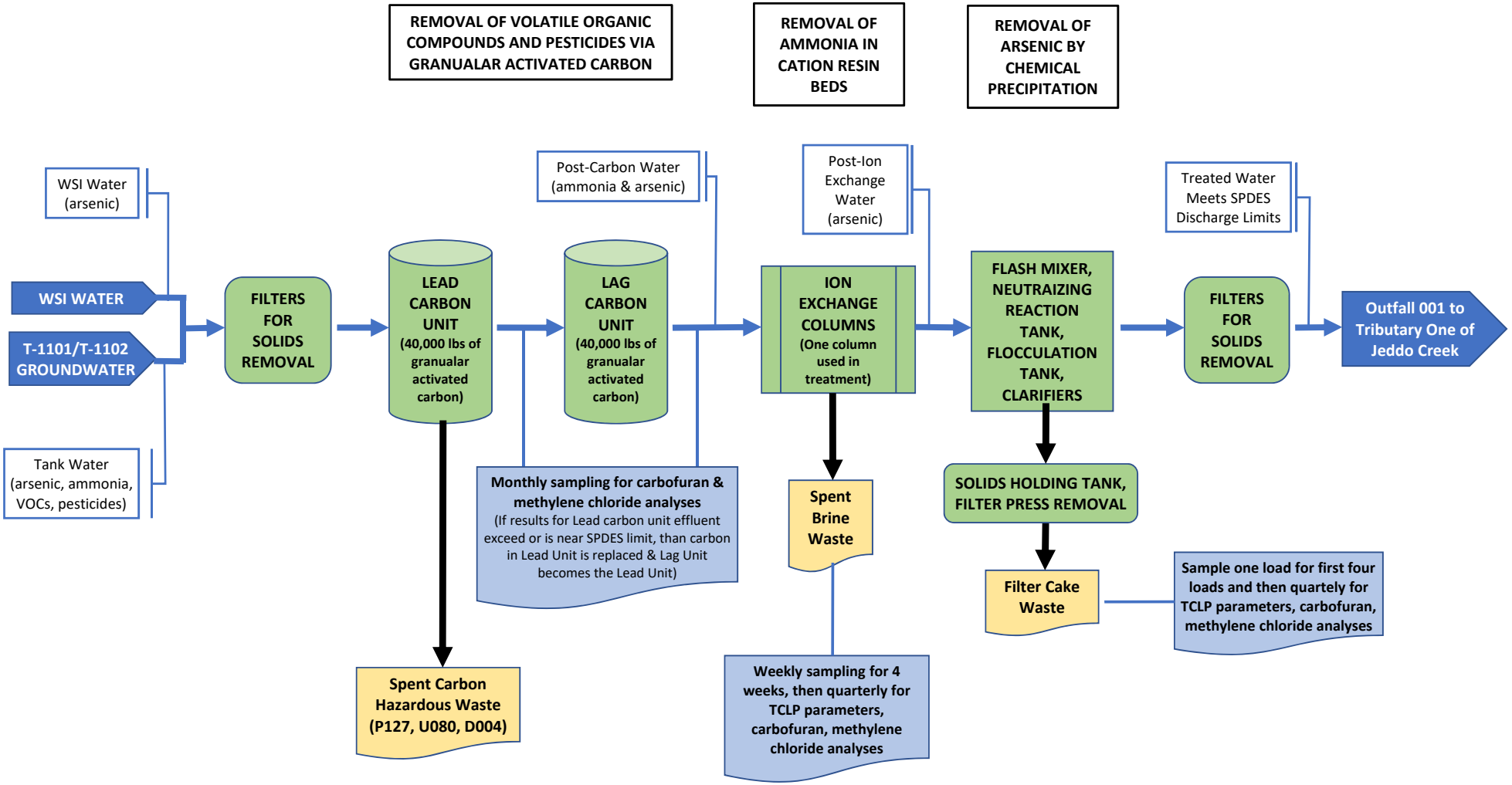
WATER TREATMENT SYSTEM PROCESS FLOW DIAGRAM

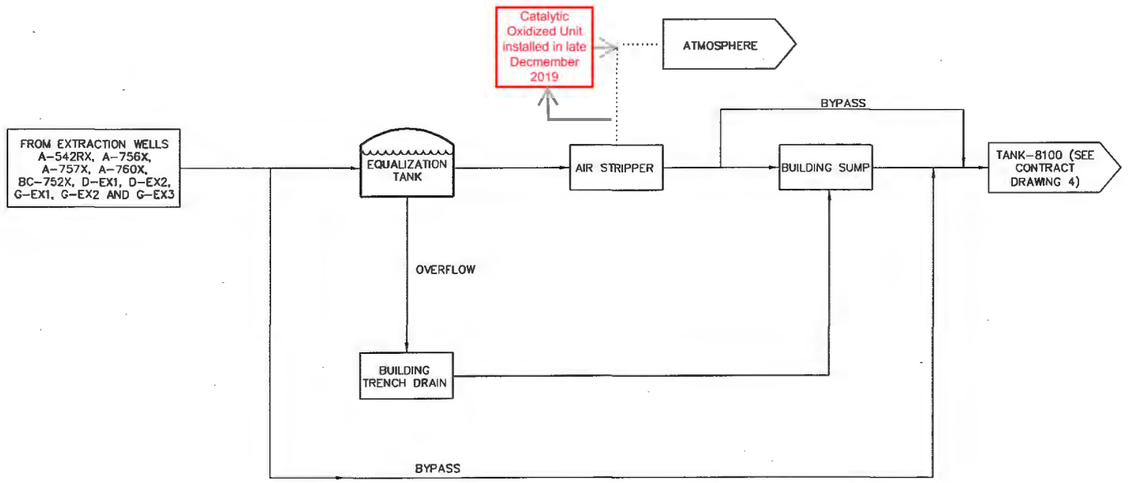
MECHANICAL

ARCADIS Project No.: 37706.0000.00203
Date: JULY 2008

ARCADIS
6723 TOWPATH ROAD
SYRACUSE, N.Y., 13215
TEL. 315.446.9120

WATER TREATMENT PLANT PROCESS & WASTES
FMC CORPORATION, MIDDLEPORT, NY





LEGEND:

——— PRIMARY PROCESS LINE

NOT TO SCALE

THIS BAR REPRESENTS ONE INCH ON THE ORIGINAL DRAWING: USE TO VERIFY FIGURE REPRODUCTION SCALE

No.	Date	Revisions	By	Ckd

Professional Engineer's Name: DAVID R. GERBER
Professional Engineer's No.: 073001

State	Date Signed	Project Mgr.
NY		TEM
Designed by	Drawn by	Checked by
MMP	KLS	

ARCADIS

ARCADIS OF NEW YORK, INC.

FMC CORPORATION • MIDDLEPORT, NEW YORK
WATER TREATMENT PLANT UPGRADE

PRETREATMENT BUILDING PROCESS FLOW DIAGRAM

MECHANICAL

ARCADIS Project No.: 37706.0000.00203
Date: JULY 2008

ARCADIS
6723 TOWPATH ROAD
SYRACUSE, N.Y., 13215
TEL. 315.446.9120

5

LEGEND:

——— PRIMARY PROCESS LINE

SWALE

1,500,000 GAL.
WESTERN SURFACE
IMPOUNDMENT

PUMPING TANK

43,000 GALLONS
T8100

P-8100
GROUNDWATER
TRANSFER PUMP

GROUNDWATER
COLLECTION
TANK

635,000 GALLONS
T1101

GROUNDWATER
COLLECTION
TANK

635,000 GALLONS
T1102

WATER
TREATMENT
SYSTEM

(SEE CONTRACT DRAWING 6)

P-1101/1102
GROUNDWATER
TRANFER PUMP

PRETREATMENT
BUILDING
(CALGON)
(SEE CONTRACT DRAWING 5)

BYPASS

T1101/T1102 SUMP

TO
TRANSFER
FACILITY

SUMP 10
EAST PAD
SUMP

SUMP 9
TRUCK UNLOAD
SUMP

SUMP 11
CALGON
SUMP

SUMP 12
NORTH PAD
SUMP

SUMP 7
CSI
INTERCEPTOR

SUMP 6
RAYMOND MILL
SUMP

SUMP 8
RAIL UNLOADING
SUMP

SUMP 5
BUILDING 67
SUMP

SUMP 13
EVAPORATOR
TANKS SUMP

SUMP 14
BOILER HOUSE
SUMP

SUMP 2
SWALE
UNDERDRAIN
No. 1

SUMP 3
WSI
UNDERDRAIN

SUMP 1
SANITARY SEWER
UNDERDRAIN

SUMP 15
SWALE
UNDERDRAIN
No.3

SUMP 4
SWALE
UNDERDRAIN
No.2

Treated water
storage tank was
replaced with
effluent bag filters
on July 31, 2019

TREATED
WATER
TANK

500,000 GAL.

T6008

TO
TRIBUTARY ONE

WELL G-EX3
WELL G-EX2
WELL G-EX1
WELL D-EX1
WELL D-EX2
WELL A-760X
WELL A-542RX
WELL A-757X
WELL A-752X
WELL A-756X
WELL A-758X
WELL A-759X
WELL C-EX2
WELL C-EX1

FIT — FLOW INDICATING TRANSMITTER
FIQ — FLOW INDICATING TOTALIZER

NO.	REVISIONS	DRAWN	CHKD.	APP.	DATE
0	GENERAL REVISION	JF			12/00

SCALE : AS SHOWN

PROJECT NUMBER: 09981-00(000) | FILE NAME: 09981-00(000)PS-NF001

CONESTOGA-ROVERS & ASSOCIATES

DRAWN BY . . . JF . . .
DATE . . . 3/24/00
DESIGNED BY. . . . . .
DATE . . . . . .
APPROVED . . . . . .
DATE . . . . . .

FMC
MIDDLEPORT, NEW YORK

DWG.09981-00(000)PS-01 SHT.

GROUNDWATER EXTRACTION SYSTEM
PROCESS FLOW DIAGRAM

THIS BAR REPRESENTS ONE INCH ON THE ORIGINAL DRAWING: USE TO VERIFY FIGURE REPRODUCTION SCALE

No.	Date	Revisions	By	Ckd

Professional Engineer's Name	DAVID R. GERBER		
Professional Engineer's No.	073001		
State	NY	Date Signed	Project Mgr. TEM
Designed by	MMP	Drawn by GMS	Checked by

ARCADIS

ARCADIS OF NEW YORK, INC.

FMC CORPORATION • MIDDLEPORT, NEW YORK
WATER TREATMENT PLANT UPGRADE

PROCESS FLOW DIAGRAM

MECHANICAL

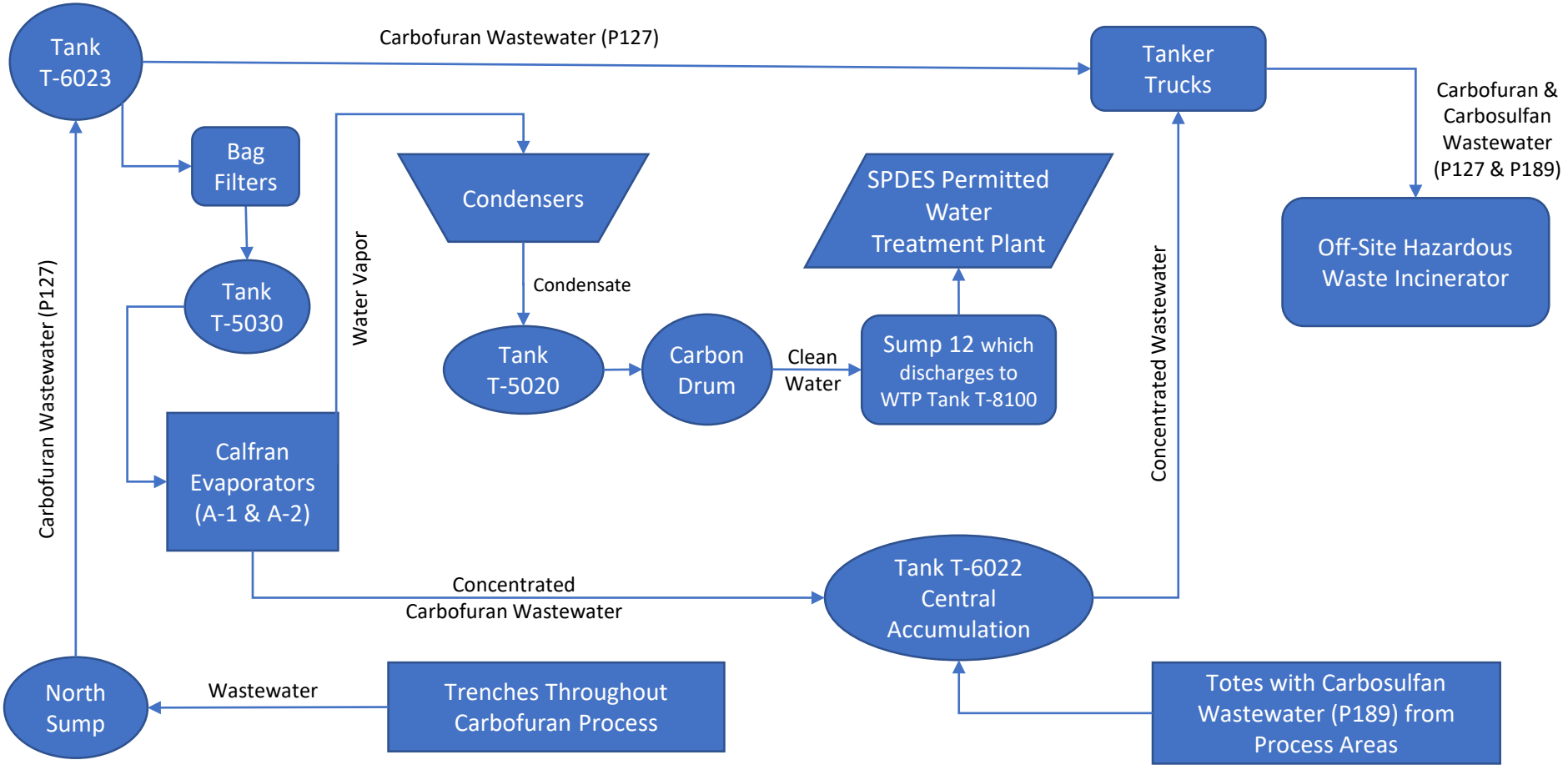
ARCADIS Project No.
37706.0000.00203

Date
JULY 2008

ARCADIS
6723 TOWPATH ROAD
SYRACUSE, N.Y., 13215
TEL. 315.446.9120

4

Calfran Process Flow Diagram
FMC Middleport NY Plant



Attachment C

Summary of Container and Satellite Accumulation Areas

Summary of Container and Satellite Accumulation Areas					
Storage Area Type*	**Location**	**Wastes**	**Waste Container Description(s)**	**Possible Waste Classifications**	**Possible Hazards**
SAA	Bldg 48 Lab 1	Lab solvents	1-gallon container	D001	Ignitable
SAA/ CAA	Bldg 48 Lab 3	Lab solvents	Red metal one-gallon container	D001, F002, F003, F005, D022-chloroform	Ignitable, Toxic
		Lab solvents with carbofuran and/or carbosulfan	1-Quart container	P127-carbofuran P189-carbosulfan	Ignitable, Acute Toxicity
		Plastic pipettes and glass tubes containing pesticide wastewaters - CAA	Red 30-gallon container	P127-carbofuran P189-carbosulfan	Acute Toxicity
CAA	Bldg 48 Lab 4	Pesticide-containing wastewaters	Black metal 30-gallon drum	P127-carbofuran P189-carbosulfan	Acute Toxicity
CAA	Bldg 82 Lab Solvent Storage Shed	Lab solvents	Black metal 55-gallon drum	P127-carbofuran P189-carbosulfan D001, F002, F003, F005, D022-chloroform	Ignitable, Toxic, Acute Toxicity
CAA	Bldg 65 East Wall	Empty carbofuran bags	Plastic- lined cardboard boxes stacked on wooden pallets	P127-carbofuran	Acute Toxicity
		Contaminated Debris and Rubbish	Plastic- lined cardboard boxes stacked on wooden pallets	P127-carbofuran	Acute Toxicity
		Carbofuran Solids	Plastic- lined cardboard boxes stacked on wooden pallets	P127-carbofuran	Acute Toxicity
		Lab solvents	Black metal 55-gallon drums	P127-carbofuran P189-carbosulfan D001, F002, F003, F005, D022-chloroform	Ignitable, Toxic, Acute Toxicity
		Aerosol cans	Black metal 55-gallon drums	D001, D035-methyl ethyl ketone	Ignitable Toxic

Summary of Container and Satellite Accumulation Areas					
Storage Area Type*	**Location**	**Wastes**	**Waste Container Description(s)**	**Possible Waste Classifications**	**Possible Hazards**
		Paint cans	Black metal 55-gallon drums	D001, D035-methyl ethyl ketone	Ignitable
		Switches	Black metal 55-gallon drums	D009-mercury	Toxic
		Carbofuran Clean-up wastewaters	275-gallon plastic totes	P127-carbofuran	Acute Toxicity
		Non-hazardous wastes and various chemicals	55-gallon drums, 275-gallon plastic totes	Variable	
CAA	Bldg 65 Tech Dumping (when processing Furadan)	Empty carbofuran bags	Plastic- lined cardboard box stacked on wooden pallet	P127-carbofuran	Acute Toxicity
CAA	Bldg 70 North Wall	Contaminated Debris and Rubbish	Plastic- lined cardboard box stacked on wooden pallet	P127-carbofuran	Acute Toxicity
CAA	Bldg 70 Calfran Room	Contaminated Debris and Rubbish	Plastic-lined cardboard box stacked on wooden pallet	P127-carbofuran	Acute Toxicity
		Carbofuran wastewaters	275-gallon totes (clean-up waters or T-6022 overflow) - typically empty)	P127-carbofuran	Acute Toxicity
CAA	Bldg 70 Furadan Flowable (when processing Furadan)	Contaminated Debris and Rubbish	55-gallon drum or plastic lined cardboard box stacked on wooden pallet or Red Trash Can	P127-carbofuran	Acute Toxicity
CAA	Bldg 70 South Dry Room	Contaminated Debris and Rubbish	Plastic-lined cardboard box stacked on wooden pallet	P127-carbofuran	Acute Toxicity

Summary of Container and Satellite Accumulation Areas					
Storage Area Type*	**Location**	**Wastes**	**Waste Container Description(s)**	**Possible Waste Classifications**	**Possible Hazards**
CAA	Bldg 72 Export Area	Contaminated Debris and Rubbish	Plastic- lined cardboard box stacked on wooden pallet	P127-carbofuran	Acute Toxicity
CAA	Various outdoor locations on asphalt or concrete surfaces	Contaminated soil and/or debris	Roll-offs (20-30 cubic yards)	D004, P127, U080, D008	Toxic, Acute Toxicity
Universal Waste	Bldg 65 West Wall	Lamps and Electronics	Plastic- lined cardboard box stacked on wooden pallet	not applicable	
		Batteries and Thermostats	5-gallon containers	not applicable	
	Bldg 75 Maintenance	Lead acid batteries	On pallets or provided directly to recycler	not applicable	
* CAA = Central Accumulation Area; SAA = Satellite Accumulation Area					

Attachment D

Summary of Aboveground Tanks

Summary of RCRA Aboveground Tanks

Location	Tank	Process	Contents	Total Capacity (gallons)	Working Capacity (gallons)	Construction	Secondary Containment	Notes
Inside Bldg #74	T-1000	Equalization for air stripper pre-treatment of groundwater as part of the Water Treatment Plant (WTP)	Groundwater Hazardous Waste	1,000	900	Polyethylene	None	Tank T-1101 is part of the WTP, which is exempt from RCRA permitting as set forth in 6 NYCRR 373-1.1(d)(1)(xii).
North of Bldg #22	T-1101	Equalization and storage of contaminated groundwater and water for Water Treatment Plant (WTP)	Groundwater Hazardous Waste	600,000	570,000	Carbon steel	None	Tank T-1101 is part of the WTP, which is exempt from RCRA permitting as set forth in 6 NYCRR 373-1.1(d)(1)(xii).
North of Bldg #22	T-1102	Equalization and storage of contaminated groundwater and water for Water Treatment Plant (WTP)	Groundwater Hazardous Waste	600,000	570,000	Carbon steel	None	Tank T-1102 is part of the WTP, which is exempt from RCRA permitting as set forth in 6 NYCRR 373-1.1(d)(1)(xii).
Bldg #70 Calfran Room	T-5030	Calfran Unit	Hazardous Wastewater	2,000	2,000	Steel	Calfran Room	Tank T-5030 and equalization tank for the Calfran Unit, which is exempt from RCRA permitting as set forth in 6 NYCRR 373-1.1(d)(1)(xii) as condensate water discharges to the WTP.

Location	Tank	Process	Contents	Total Capacity (gallons)	Working Capacity (gallons)	Construction	Secondary Containment	Notes
Bldg #70 Calfran Room	T-6022	Calfran Unit 90-day Central Accumulation Area Tank	Hazardous Wastewater	5,500	5,000	Stainless Steel	Calfran Room trench drain system	Tank T-6022 is used as a 90-day Central Accumulation Area tank for concentrated wastewater from the Calfran Unit.
Bldg #70 East Pad	T-6023	Calfran Unit or 90-day Central Accumulation Area Tank	Hazardous Wastewater	18,000	14,500	Stainless Steel	Concrete block (with T-6024)	Tank T-6023 receives wastewater and is part of the Calfran Unit, which is exempt from RCRA permitting as set forth in 6 NYCRR 373-1.1(d)(1)(xii). Alternatively, T-6023 can be used as a 90-day Central Accumulation Area tank.
West of Bldg #74	T-8100	Groundwater flow-through or temporary storage for WTP	Groundwater Hazardous Waste	43,000	38,000	Stainless Steel	Steel	Tank T-8100 is part of the WTP, which is exempt from RCRA permitting as set forth in 6 NYCRR 373-1.1(d)(1)(xii).

Attachment E

Summary of Environmental Spill Kits

Summary of Environmental Spill Kits

Location	Nearby Storage	Contents Description **
Bldg 80 outside west wall	Fuel oil tank and diesel generator	Yellow kit: 2 booms, oil pads, 20 gal overpack. Disposable bags and ties and emergency response guidebook
Bldg 80 inside south wall	Ferric chloride truck unloading fill port	Yellow kit: absorbent socks, pads, gloves, and emergency response guidebook
Bldg #48 Lab 2	Carbofuran debris and wastewaters and lab solvents in Labs 1, 2, and 3	Spill Solv Caustic Spill Kit, Acid Saf-T Spill Kit, Solvent Saf-T Spill Kit, Resisorb Mercury Vapor Absorbent
Bldg 23 outside southwest wall	Covered Clomazone and A-200 aboveground storage tanks	Two Yellow kits: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag
Bldg 23 Inside near west man door	Hot-oil heated water tank	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag
Bldg 23 Inside north Side of building	WP Packaging Process Area	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag
Bldg 23 Inside south side of bulding	Rugby Process Area	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag
Bldg 71 Inside south overhead door	Corn oil tank	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag
Bldg 71 Outside	Tank truck unloading area for A200, A100 and oil	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag
Bldg 71 North Wall	Rapid Response Packaging	Large Yellow Kit with wheels with 2 boxes Green Stuff, 4 Bags Oil Dri, 2 boxes absorbent pads, 5 absorbent socks, 2 plastic shovels, 2 brooms, dust pan, squeegie, 2 5-gallon pails, goggles, and 6 barrier suits.
Bldg #65 West Wall	Universal Waste	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag

Location	Nearby Storage	Contents Description **
Bldg #65 Outside South Wall	Loading Docks	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag
Bldg #65 Loading Dock, East Wall	RCRA Hazardous Waste Storage Area (hazardous waste and used oil)	Large Yellow Kit with wheels with 2 boxes Green Stuff, 4 Bags Oil Dri, 2 boxes absorbent pads, 5 absorbent socks, 2 plastic shovels, 2 brooms, dust pan, squeegee, 2 5-gallon pails, goggles, and 6 barrier suits.
Bldg #70 Near Lunch Room	Carbofuran and carbofuran bags, maintenance chemicals at Bldg #70 West Wall and North Wall	Large Yellow Kit with wheels with absorbent, pads, socks, shovels, brooms, dust pan, pails, gloves, goggles, and barrier suits
Bldg #70 Outside North Wall	Diesel fuel tank	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag
Bldg 70 East Tank Truck Unloading/Loading Area	Mineral oil (T-6024), hazardous waste water tank (T-6023), propylene glycol tank	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag
Bldg #72 Export Packaging Area	Carbofuran and carbofuran bags	Oil Dri fiber drum with absorbent and scoop (Approximately 10 pounds of absorbent).
Bldg #72 Outside – Solvent Unloading	Solvent Unloading	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag
Bldg #72/73	Near aromatic storage tanks and flowable room	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag
Bldg #72 Truck Dock	At Loading Docks Inside Building	Large Yellow Kit with wheels with absorbent, pads, socks, shovels, brooms, dust pan, pails, gloves, goggles, and barrier suits
Bldg # 82 Lab Solvent Storage Shed	Lab solvents	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag
Bldg #72 North/East Wall	Material storage area	Yellow kit: 1 gallon jug Ensrob, universal pads, large and small universal socks, pack wipes, nitrile gloves, goggles, disposal bag

Attachment F

Emergency Response Contact Information

Emergency Response Contact Information

FMC Middleport New York Facility

Revised: December 2019

TITLE	*NAME*	*CONTACT INFORMATION*
FMC Middleport Plant Personnel 100 Niagara Street, Middleport, NY		
Emergency Coordinator (EC) • Plant Manager	Brent Sensenich	Cell: 913-708-0123 Office: 716-735-6324 Location: Building 105 Main Offices
7-day/24-hour emergency telephone number		Cell: 716-449-0720
Alternate EC • Operations Manager	Patrick Stahura	Cell: 716-830-7461 Office: 716-735-6317 Location: Building 48 Offices
Primary Incident Commander	Archie Ames	Cell: 585-764-0284 Office: *Contact via plant intercom*
Alternate Incident Commander •	John Becker	Cell: 716-348-0127 Office: *Contact via plant intercom*
Parsons – Wastewater Treatment Plant (WTP) – Building 80		
Parsons 24 Hour Emergency Response: 800-321-8642		
Parsons FMC Middleport Superintendent	Heather Philip	Cell: 315-418-0048 Heather.Philip@parsons.com
Parsons FMC Middleport WTP Operator	Kevin Zito	Cell: 716-474-9069 Kevin.Zito@parsons.com
Parsons FMC East Coast OM&M Portfolio Manager	Raymond Banary	Cell: 216-701-6227 Office: 216-912-2912 Raymond.J.Banary@Parsons.com
Outside Response Agencies, Contractors DIAL 911 FOR ALL FIRE, POLICE & EMS EMERGENCIES		
Chief, Middleport Volunteer Fire Department	Ryan Czaja	Station: 716-735-7872 (non-emergency) http://www.middleportfire.com/

TITLE	***NAME***	***CONTACT INFORMATION***
Middleport Police Department	John J. Swick	Station: 716-735-3373 (non-emergency) middleportpd@villageofmiddleport.org
Niagara County Sheriff's Dispatcher	--	716-735-3700 (non-emergency)
Hospital (Primary)	Eastern Niagara Hospital – Lockport Site	521 East Avenue Lockport, New York 14094 Phone: 716-514-5800 x 3601
Hospital (Backup)	Medina Memorial	200 Ohio Street Medina, New York 14103 Main: 585-798-8135 Emergency Dept.: 585-798-8077
Poison Control (National)	--	800-222-1222
Western NY Poison Control	--	716-876-7654
OSHA Region II	--	800-356-4674
Niagara County Emergency Services & Fire Coordinator	Jonathan Schultz	5574 Niagara Street Extension Lockport, NY 14094 Phone: 716-438-3171 jonathan.schultz@niagaracounty.com
NYSDEC Spill Hot Line	--	800-457-7362
National Response Center	--	800-424-8802
CHEMTREC	--	800-424-9300
Cleanup Contractor	Environmental Service Group	716-695-6720 800-348-0316
Utility Company Contacts		
Electrical	National Grid	**Emergency: 1-800-867-5222** *Non-Emergency: 1-800-664-6729*
Electrical	GDF Suez	**Emergency: 1-800-867-5222** *Non-Emergency: 1-888-232-6206*

TITLE	***NAME***	***CONTACT INFORMATION***
Water and Sewer	Village of Middleport Village Coordinator (Bryan Bobbitt)	**Office: (716) 735-3373** **Cell: (716) 560-1154**
Gas	New York State Electric and Gas	**Emergency: 800-572-1121** *Non-Emergency: 800-572-1111*
Gas	National Fuel Resources	**Emergency: 800-444-3130** *Non-Emergency: 716-630-6778*
Local Government and School		
Middleport Mayor's Office	--	716-735-3303
Niagara County Health Department	--	716-439-7430* * Mon – Fri. 0800-1600
Royalton-Hartland Central School District (RHCSD) Emergency Coordinator	Paul Nowatka	716-982-4918 716-731-6800 ext. 2241
Royalton-Hartland Central School District (RHCSD) Director of Facilities	Timothy Pietrowski	716-735-2000, ext. 2339 Cell: 716-998-7145
Royalton-Hartland Central School District (RHCSD) Superintendent	Dr. Hank Stopinski	716-735-2000, ext. 2318 Cell: 716-270-3143

Attachment G

Contingency Plan Distribution

RCRA Contingency Plan Distribution	
Organization	**Address**
Middleport Volunteer Fire Department	Fire Ryan Czaja Middleport Volunteer Fire Department 28 Main Street PO Box 94 Middleport, New York 14105-0186
Middleport Police Department	Chief John J. Swick Middleport Police Department 22 Main Street P.O. Box 186 Middleport, New York 14105-0186
Niagara County Emergency Services/LEPC	Jonathan Schultz Niagara County Emergency Services & Fire Coordinator Public Safety Training Facility 5574 Niagara St. Ext. Box 496 Lockport, New York 14095-0496
Hospital (Primary)	Eastern Niagara Hospital – Lockport Site Emergency Department 521 East Avenue Lockport, New York 14094
Hospital (Backup)	Medina Memorial Hospital Emergency Department 200 Ohio Street Medina, New York 14103
Cleanup Contractor	Environmental Service Group 177 Wales Avenue Tonawanda, NY 14150
Middleport Municipal Offices	Village of Middleport 24 Main Street P.O. Box 186 Middleport, New York 14105-0186
Niagara County Health Department	Niagara County Health Department Emergency Preparedness Division Mountview Campus – Shaw Building 5467 Upper Mountain Road, Suite 100 Lockport, New York 14094
Emergency Coordinator- Royalton-Hartland Central School District (RHCSD)	Emergency Coordinator Royalton-Hartland District Office 54 State Street Middleport New York 14105-0186

Attachment H

External Spill or Release Reporting Procedure

External Spill or Release Reporting Procedure
FMC Corporation
Middleport, New York Facility
October 13, 2020

1. Introduction

This External Spill or Release Report Procedure was developed specifically for the FMC Corporation Middleport, New York facility ("Facility") for use when any spills, leaks, discharges or releases occur at the Facility.

The bases for this procedure include the following regulatory requirements:

- Hazardous substance release notification under Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Section 103(a), and 40 CFR 302.6;
- Hazardous substance and Extremely Hazardous Substances (EHS) release notification under Emergency Planning and Community Right-to-Know Act (EPCRA) Section 304 and 40 CFR 355.30 and 355.40;
- New York State Department of Environmental Conservation (NYSDEC) chemical bulk storage (CBS) and hazardous substance release notification under 6 NYCRR 597.4;
- RCRA hazardous waste release, fire or explosion notification and reporting under Exhibit E of the Order and 6 NYCRR 373-2.4(g)(4), (9) and (10);
- Notification of releases of oil and any liquid release that could pollute New York state water or land under ECL 17-1743;
- Notification of releases of petroleum under 17 NYCRR 32.3 and 32.4;
- Release notification of petroleum under NYSDEC petroleum bulk storage (PBS) regulations, 6 NYCRR 613-6; and
- Release notification of oil under Clean Water Act Section 311 regulations, 40 CFR 110 ("Sheen Rule") and the Oil Pollution Prevention (OPP) regulations in 40 CFR 112.4.

The above regulatory release reporting requirements are also summarized in Section 1.1 of the NYSDEC *Spill Guidance Manual*, the *NYSDEC Division of Environmental Remediation Spill Response & Remediation Frequently Asked Questions* (FAQs) and the *RCRA, Superfund & EPCRA Hotline Training Module; Introduction to CERCLA and EPCRA Release Reporting Requirements* (dated February 1988).

2. Internal Spill or Release Reporting and Recordkeeping

The Environmental, Health and Safety (EHS) Manager (Primary), the facility Emergency Coordinator, the Plant Manager, FMC Corporate EHS Counsel and FMC Corporate EHS

personnel all must be immediately notified of any spills, leaks, discharges or releases at the Facility.

The EHS Manager (Primary), Emergency Coordinator or Plant Manager, with input from FMC EHS Corporate Counsel, will determine if any external notifications are required, and then make the appropriate notifications within the required time period. In addition to these procedures, reporting requirements under other Facility environmental permits may also apply and should be reviewed based on the nature of the incident and as discussed in this procedure. These permits include the State air permit, State Pollutant Discharge Elimination System (SPDES) permit and sanitary sewer permit.

The EHS Manager or designee will document both non-reportable and reportable chemical discharges, spills or releases at the Facility, excluding those allowed under existing environmental permits. This documentation will be maintained at the Facility for five years [6 NYCRR 598.1(k)(2)], and will be reviewed periodical when updating spill response plans (i.e.,

3. Oil or Petroleum Spill or Release Reporting

Reporting of releases of oil, petroleum (as defined in 6 NYCRR 613-1.3(as)) or petroleum mixture (as defined in 6 NYCRR 613-1.3(at)) are as follows:

Regulation	***Reporting Trigger***	***Timing to Notify***	***Agency to Notify***
17 NYCRR 32.3 and 32.4	Any oil or petroleum spill to land (except paved surfaces) or water except spills that meet **ALL** of the following criteria: • Quantity is known to be less than five gallons; • Spill is contained and under control of spiller; • Spill has not and will not reach water or land (except paved surfaces); and • Spill is cleaned up within two hours of discovery.	Within two hours of discharge or discovery of the incident.	Verbal report to NYSDEC Hotline 1-800-457-7362 Or 1-518-457-7362 if calling from outside the state

Regulation	***Reporting Trigger***	***Timing to Notify***	***Agency to Notify***
• ECL 17-1743 • 6 NYCRR 613-6.2	• Any petroleum spill that would likely pollute land (except paved surfaces) or waters of the state, including groundwater. • When results of any inventory, record or inspection show that a PBS tank may be leaking.	Within two hours of discovery	Verbal report to NYSDEC Hotline 1-800-457-7362 Or 1-518-457-7362 if calling from outside the state
• 40 CFR 110 • 33 CFR 153.203	Any oil releases to navigable waters that may be harmful to public health and the environment including those that: • violate water standards, • cause a film, sheen or discoloration on the navigable waters or adjoining shorelines, **or** • cause a sludge or emulsion to be deposited beneath the water surface or adjoining shorelines.	Immediate	Verbal report to 1. National Response Center (NRC) at 1-800-424-8802 If not available, 2. US Coast Guard at 1-800-424-8802
• 40 CFR 112.4	• Any single discharge of more than 1,000 gallons of oil to navigable waters **OR** • More than 42 gallons of oil in each of two spill events to navigable waters within a 12-month period	Within 60 days of meeting the reporting trigger	Written report to USEPA Region 2 Administrator

3.1 Verbal Reports

When providing verbal reports by phone, the operator will likely ask about the following information:

- Time and date of accident or spill;
- Chemical name and type of material spilled;

- Location of spill (town, county, route, etc.);
- Probable source or cause of accident;
- Estimate of amount of materials spilled;
- Action being taken to mitigate effects of spillage;
- Personnel at scene of accident; and
- Names of other agencies and persons contacted.

The Spill or Release Documentation Form, provided at end of this procedure, should be used to document the call and incident.

3.2 Written Reports Under 40 CFR 112.4

If the Facility discharges more than 1,000 gallons of oil to navigable waters in a single spill, or the Facility discharges more than 42 gallons of oil in each of two spill events to navigable waters within a 12-month period, then the Facility must submit information concerning the release(s) within 60 days to Regional Administrator of the United States Environmental Protection Agency, Region II (USEPA Region II) at:

Regional Administrator
USEPA Region 2
290 Broadway
New York, NY 10007-1866

The information below will be mailed in a report to the USEPA:

- Name of the person reporting the discharge;
- Name of facility;
- Location of the facility;
- A description of the facility and including maps, flow diagrams, and topographical maps, as necessary (can be found in the SPCC Plan);
- Maximum storage or handling capacity of the facility and normal daily throughput (can be found in the SPCC Plan);
- Date and time of the discharge(s);

- Cause and source of the discharge(s);
- Type of material and estimate of the total quantity discharged;
- Affected media (e.g., soil, surface water, groundwater);
- Failure analysis results for the system where the discharge occurred;
- Corrective action and countermeasures taken, including description of equipment repairs/replacements; and
- Any additional preventive measures taken or planned to minimize the possibility of recurrence.

4. Hazardous Waste or Substance Spill or Release Reporting

Any spill or release of chemicals, CBS hazardous substances, CERCLA EHS, hazardous waste or hazardous waste constituent or mixtures containing hazardous wastes constituents or hazardous substances will be identified to determine the reportable quantities (RQs). RQs are contained in the:

- USEPA List of Lists - Consolidated List of Chemicals Subject to the Emergency Planning and Community Right- To-Know Act (EPCRA), Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and Section 112(r) of the Clean Air Act, dated March 2015 ("List of Lists") and on USEPA's website at http://www2.epa.gov/epcra/epcracerclacaa-ss112r-consolidated-list-lists-march-2015-version and
- NYSDEC CBS hazardous substances listed in 6 NYCRR 597.3, which can be found on NYSDEC's website at http://www.dec.ny.gov/regs/2490.html. CBS hazardous substances at the Facility include, but may not be limited to, ferric chloride and carbofuran.

The RQ for mixtures containing hazardous substances is the amount of the hazardous substance components in the mixtures. Reporting requirements are as follows:

Regulation	***Reporting Trigger***	***Timing to Notify***	***Agency to Notify***
RCRA 6 NYCRR 373-2.4(g)(4) and	If there is a release, fire, explosion which could threaten human health or the environment outside of the Facility boundaries	Immediately	Verbal report to: NYSDEC Hotline at 1-800-457-7362 or 1-518-457-7362 if calling from outside the state AND the Niagara County Emergency Services & Fire Coordinator at 716-438-3171.
RCRA 6 NYCRR 373-2.4(g)(4), (9) and (10)	Implementation of RCRA Contingency Plan	Before resuming operation of in affected area of the Facility AND Within 15 days of incident	Written Report to NYSDEC Commissioner and appropriate State and local authorities
ECL 17-1743	Any liquid (hazardous substance) spill that would likely pollute land (except paved surfaces) or waters of the state, including groundwater of any liquid at that facility	Within two hours of discovery	Verbal report to NYSDEC Hotline at 1-800-457-7362 Or 1-518-457-7362 if calling from outside the state
CBS regulations under 6 NYCRR 597.4(b)(1)	Any release of any CBS hazardous substance(s) listed in Part 597 • at quantities at or exceeding the RQ listed in 6 NYCRR 597.3 within any 24-hour period **OR** • at quantities less than the RQ listed in 6 NYCRR 597.3 if such release results,	Within two hours of discharge or discovery of the incident.	Verbal report to NYSDEC Hotline 1-800-457-7362 Or 1-518-457-7362 if calling from outside the state

Regulation	*Reporting Trigger*	*Timing to Notify*	*Agency to Notify*
	causes or may be reasonably expected to result in or cause any of the following: - a fire with potential off-Site impacts, - an explosion, - contravention of air quality standards, - vapors, dust and/or gases that may cause illness or injury, OR - contravention of water quality standards from fire control or dilution waters (e.g., WSI overflow water)		
CBS regulations under 6 NYCRR 597.4(b)(2)	Any release of a mixture containing CBS hazardous substance(s) listed in Part 597 • if the composition/quantity of the hazardous substance(s) in the spilled mixture is known and the calculated spilled amount of hazardous substance is at or exceeds the RQ(s) listed in 6 NYCRR 597.3 within any 24-hour period **OR** • if the composition/quantity of the hazardous substance(s) in the spilled mixture is NOT known, then reporting is required where the total amount of the mixture released is at or exceeds the lowest RQ(s) listed in 6 NYCRR 597.3 within any 24-hour period	Within two hours of discharge or discovery of the incident.	Verbal report to NYSDEC Hotline 1-800-457-7362 Or 1-518-457-7362 if calling from outside the state
CBS regulations under 6 NYCRR 597.4(b)(3)	A spill or overfill of a CBS hazardous substance of mixture to a secondary containment at quantities at or exceeding the RQ(s) listed in 6 NYCRR 597.3 do not have to be reported if **ALL** of the following conditions are met: • there is control over the spill and it is completely contained; and	Within 24 hours from time of spill or overfill	Verbal report to NYSDEC Hotline 1-800-457-7362 Or 1-518-457-7362 if calling from outside the state

Regulation	*Reporting Trigger*	*Timing to Notify*	*Agency to Notify*
	• the spill has not and will not reach the lands or waters of the State; and • the spill is cleaned up within two hours after discovery; and • the total volume of the spill is recovered or accounted for; and • the spill will not cause or may be reasonably expected to result in or cause any of the following: - a fire with potential off-Site impacts, - an explosion, - contravention of air quality standards, - vapors, dust and/or gases that may cause illness or injury, OR - contravention of water quality standards from fire control or dilution waters (e.g., WSI overflow water)		
CERCLA 103 Release Notification Regulations (40 CFR 302)	The following conditions must be met to trigger notification to the NRC: • There is a release into the environment. For example, a release wholly contained within a building or structure or a permitted does not require notification. • The material released in a hazardous substance under CERCLA that equals or exceeds a reportable quantity within a 24-hour period (see List of Lists).	Immediate	Report to National Response Center (NRC) at 1-800-424-8802 OR if not available, US Coast Guard at 1-800-424-8802

Regulation	***Reporting Trigger***	***Timing to Notify***	***Agency to Notify***
EPCRA 304 Release Notification Regulations (40 CFR 355)	The following conditions must be met to trigger notification to the NRC: • There is a release into the environment with the potential to affect off-site persons. For example, a release wholly contained within a building or structure or a permitted does not require notification and a release that seeps into the ground through cracks in the concrete or volatilizes into the atmospheres via process vents could be subject to notification requirements. • The material released in a hazardous substance under CERCLA or EHS under EPCRA that equals or exceeds a reportable quantity within a 24-hour period (see List of Lists).	Immediate	Verbal and Written Follow-up Report to • New York State Emergency Response Commission (SERC) at 518-292-2302 • Niagara County Local Emergency Planning Committee (LEPC) represented by the Niagara County Emergency Services & Fire Coordinator at 716-438-3171.

4.1 Verbal Reports

When providing verbal reports by phone, the operator will likely ask about the following information:

- Time and date and duration of the spill or release;
- Chemical name and type of material spilled (indication of whether the material spilled is an EHS);
- Medium or media into which the release occurred;
- Any known or anticipated acute or chronic health risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for exposed individuals;
- Proper precautions to take as a result of the release, including evacuation (unless such information is readily available to the community emergency coordinator pursuant to the emergency plan);

- Location of spill (town, county, route, etc.);
- Probable source or cause of accident;
- Estimate of amount of materials spilled/released to the environment
- Discuss potential to affect off-Site persons;
- Action being taken to mitigate effects of spillage;
- Personnel at scene of accident;
- Name and phone number of FMC personnel to be contacted for further information; and
- Names of other agencies and persons contacted.

The Spill or Release Documentation Form, provided at end of this procedure, should be used to document the call and incident.

4.2 Written Reports

Release notifications under EPCRA 304 require a written follow-up report to the LEPC and the SERC:

New York State Emergency Response Commission
1220 Washington Avenue, Building 22, Suite 101
Albany, NY 12226-2251

Niagara County Emergency Services & Fire Coordinator
5574 Niagara Street Extension
Lockport, NY 14094

The report must include all information required in the above verbal notice (Section 4.1) plus the following:

- updates to the information provided in the verbal notice
- additional information with respect to actions taken respond or contain the relapse,
- additional information with respect to any known or anticipated acute or chronic health risks associated with the release
- where appropriate, advice regarding medical attention necessary for exposed individuals;

- Failure analysis results for the system where the discharge occurred;
- Corrective action and countermeasures taken, including description of equipment repairs/replacements; and
- Any additional preventive measures taken or planned to minimize the possibility of recurrence.

Spill or Release Documentation Form

Facility Name and Owner: FMC Corporation

Facility Address: 100 Niagara Street, Middleport, NY (entrance along Telegraph Road)

Facility Phone Number: (716) 735-6300

Date of Spill: _____ **Time of Spill:** _____ am / pm

Duration of Spill/Release: _____

Incident Description and Location: _____

_____

Weather Conditions: _____

Source and Cause of Incident: _____

_____

Type/Name of Material Released: _____

_____

Is the Released Material a NYSDEC CBS Hazardous Substance?: No ☐ Yes ☐

an EHS? No ☐ Yes ☐ a CERCLA Hazardous Substance? No ☐ Yes ☐

Quantity of Material Released and to Where (e.g., air, soil, pavement, storm water, WSI, etc.):

_____

Danger or Threat Including Health Risks Posed by Incident: _____

_____

Proper Precautions to Take as a Result of the Release: _____

_____

External Spill or Release Reporting Procedure
FMC Corporation
Middleport, New York Facility
October 13, 2020

Number and Types of Injuries: _____

_____

_____

On-Site Emergency or Spill Response Agencies and Lead Representatives: _____

_____

_____

_____

Evacuation Conducted? **Plant:** **No** ☐ **Yes** ☐ **Off-Site:** **No** ☐ **Yes** ☐

Shelter-In- Place Conducted? **Plant:** **No** ☐ **Yes** ☐ **Off-Site:** **No** ☐ **Yes** ☐

Off-Site Evacuation or Shelter-In-Place Authorized by: _____

_____

Off-Site Neighbors Contacted: _____

_____

_____

Cleanup/Containment Measures: _____

_____

_____

_____

Amount of Spill Recovered: _____ gallons or pounds

Disposal Method of Spilled Material and Cleanup Wastes: _____

_____

External Spill or Release Reporting Procedure
FMC Corporation
Middleport, New York Facility
October 13, 2020

Action(s) Taken to Prevent Recurrence: _____

_____

_____

Agencies Notified by Phone Call:

USEPA: Yes ☐ No ☐ **NYSDEC:** Yes ☐ No ☐ **NRC:** Yes ☐ No ☐

Other Agencies: _____

Call Operator(s) Name: _____

_____

_____

Report Call Date: _____ **Operator Comments** (use separate sheet if needed)**:**

_____

_____

_____

Written Report to Agencies Needed? Yes ☐ No ☐ (If yes, attached copy)

FMC Contact Making Call and Completing the Form:

Name/Signature: _____

Title: _____

Date: _____

Please return completed form to the EH&S Manager for recordkeeping at least five years from the date of the incident.