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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 8, 1996

Mr. Frank Schultz
Wisconsin Department of Natural Resources - SED
2300 North Dr. Martin Luther King Jr. Drive
P.O. Box 12436
Milwaukee, Wisconsin 53212



Dear Mr. Schultz:

**RE: Comprehensive Episode Plan, Chrysler Corporation
Milwaukee National Parts Distribution Center (PDC)**

On behalf of the Chrysler Corporation, Triad Engineering Inc. (Triad) is providing the Wisconsin Department of Natural Resources (WDNR) with amendments to the Episode Plan for the Milwaukee National Parts Distribution Center (PDC). In December 1995, Triad provided the WDNR with an updated version of this comprehensive emergency response document. Since this document was prepared, several sections have been amended.

Enclosed with this letter are replacement sections for the following areas:

1. Table of Contents
2. Emergency Response
3. Section 2 - Plant-Wide Emergency Management
4. Exhibit G - OSHA Requirements Outline
5. Facility Site Plan - Exhibit A
6. Sewer System Plan - Exhibit A

Please insert these replacement sections into the copy of the Episode Plan currently in your possession. The previous version of each of these sections should be discarded.

If there are any questions concerning these amendments, please direct them to Mr. William Nessler, Incident Commander for the Milwaukee National PDC at (414) 747-2010.

Sincerely,

TRIAD ENGINEERING INC.

John L. Schultz, P.E.

jls\outsideb.ltr
Enclosure
c: Chrysler Milwaukee PDC

**CHRYSLER CORPORATION
MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER
TABLE OF CONTENTS**

<u>SECTION</u>	<u>PAGE</u>
ER EMERGENCY RESPONSE	
Immediate Notifications	ER-1
Spill Response Procedures	ER-4
Fire Response Procedures	ER-5
Medical Emergency Response	ER-6
Tornado/Threatening Weather Response	ER-7
Asbestos Response Procedures	ER-9
Organizational Responsibilities	ER-11
Evacuation Procedures	ER-13
Off-Site Spill Response	ER-14
1 INTRODUCTION	
1.1 Purpose and Scope	1-1
1.2 Regulatory Status	1-2
1.3 Distribution of Episode Plan and Updates	1-5
1.4 Amendment Requirements of Plan	1-6
1.5 Facility Description	1-7
1.6 Spill History	1-8
2 PLANT-WIDE EMERGENCY MANAGEMENT	
2.1 Preparedness	2-1
2.2 Emergency Response	2-4
2.3 Reporting Requirements	2-4
3 AREA SPECIFIC EMERGENCY MANAGEMENT PLANS	3-1
<u>Subsection</u>	
Area No. 1 - Outdoor Bulk Fuel Storage	
Area No. 2 - Flammable Products Storage Building	
Area No. 3 - Building 1B Battery Charging Room	
Area No. 4 - Building 6 Paint Room	
4 EMERGENCY AIR POLLUTION AIR EPISODE PLAN	
4.1 General	4-1
4.2 Facility Description	4-1
4.3 Facility Notification	4-1
4.4 Air Pollution Emergency Action Plan	4-1
4.5 Notification of Malfunctions	4-2

**CHRYSLER CORPORATION
MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER
LIST OF TABLES, FIGURES, AND EXHIBITS**

Tables

Section

- ER TABLE 1 - OFF-SITE SOURCES AND RECEPTORS
- 1 TABLE 2 - MATERIAL STORAGE LOCATIONS
- 2 TABLE 3 - FACILITY EMERGENCY EQUIPMENT LIST
- 2 TABLE 4 - TRAINING PROGRAMS

Exhibits

- A PLOT AND SEWER PLANS
 - FACILITY SITE PLAN
 - SEWER SYSTEM PLAN
 - TOPOGRAPHICAL MAP

- B EMERGENCY RESPONSE ACTION FLOWCHARTS
 - FIGURE 1 - SECURITY EMERGENCY RESPONSE ACTIONS
 - FIGURE 2 - INCIDENT COMMANDER EMERGENCY RESPONSE ACTIONS
 - FIGURE 3 - RELEASE TO SANITARY SEWER NOTIFICATIONS
 - FIGURE 4 - RELEASE TO GROUND OR SURFACE WATER NOTIFICATIONS
 - FIGURE 5 - RELEASE TO AIR NOTIFICATIONS

- C EVACUATION DRAWING

- D OUTSIDE AGENCIES AND INSTITUTIONS

- E DIRECTIONS FOR ACCESSING THE HASCON SYSTEM

- F SAMPLE EPISODE REPORT OUTLINE AND INCIDENT COMMANDER CHECKLIST

- G OSHA REQUIREMENTS OUTLINE

- H EDR REPORT

- I SMI-112 BULK LIQUID UNLOADING PROCEDURE

**CHRYSLER CORPORATION
MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER
ALPHABETICAL INDEX**

A

Air Episode Plan	4-1
Amendment of Episode Plan	1-6
Asbestos Response Procedures	ER-9

B

Building 1B Battery Charging Room - Area Plan No. 3	3-1
Building 6 Paint Room - Area Plan No. 4	3-1

C

CERCLA

- Regulatory Status	1-3
- Reporting Requirements	Exhibit B

D

Decontamination Procedures	2-4
Disposal of Spill Cleanup Wastes	2-4
Distribution of Episode Plan and Updates	1-5
DOT Hazardous Materials Transportation	1-5

E

EDR Report	Exhibit H
Emergency Equipment	2-4, Area Plans
Emergency Incident Command Structure	2-1
Emergency Response	Red Tab
Emergency Response Procedures	ER-4 to ER-10
Emergency Response Action Flowcharts	Exhibit B
Emergency Response Coordinator	2-1
Episode Report Outline	Exhibit F
Evacuation Drawing	Exhibit C
Evacuation Procedures	ER-13
External Agency Arrangements	2-4, Exhibit D

**CHRYSLER CORPORATION
MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER
ALPHABETICAL INDEX (continued)**

E

Facility Description	1-7
Facility Response Plan (FRP) Requirements	1-3
Facility Site Plan	Exhibit A
Fire Response Procedures	ER-5
First Responder Awareness Level Training	2-2
First Responder Operations Level Training	2-2
Flammable Products Storage Building - Area Plan No. 2	3-1

G

General Pretreatment Regulations	1-4
--	-----

H

Hazard Communication Program	2-3, Exhibit E
Hazardous Material Transportation	1-5
Hazardous Materials Storage - Area Plan No. 2	3-1
Hazardous Waste Storage - Area Plan No. 2	3-1

I

Immediate Notifications	ER-1 to ER-3
Incident Commander	2-1
Incident Commander Checklist	Exhibit F

L

Local Emergency Planning Committee	ER-2
--	------

M

Materials Stored	1-9, Area Plans
Medical Emergency Response Procedures	ER-6
Milwaukee County Emergency Government	ER-3
Milwaukee Metropolitan Sewerage District	ER-3

N

National Response Center	ER-2
--------------------------------	------

**CHRYSLER CORPORATION
MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER
ALPHABETICAL INDEX (continued)**

Q

Off-Site Sources and Receptors	ER-15
Organizational Responsibilities	ER-11
OSHA	ER-3
OSHA Chemical Specific Regulations	1-5
OSHA Requirements Outline	Exhibit G
Outdoor Bulk Fuel Storage - Area Plan No. 1	3-1
Outside Spill Response Contractors	ER-12, 2-4, Exhibit D

P

Plant-Wide Emergency Management	2-1
Process Safety Management (PSM) Standards	1-5
Purpose and Scope	1-1

R

RCRA	
- Regulatory Status	1-2
- Reporting Requirements	Exhibit B
Release Notification Requirements	Exhibit B

S

SARA	
- Regulatory Status	1-3
- Reporting Requirements	Exhibit B
Site Sewer Plan	Exhibit A
SPCC	
- Regulatory Status	1-2
- Reporting Requirements	Exhibit B
Spill History	1-8
Spill Response Procedures	ER-4

T

Topographical Site Map	Exhibit A
Tornado/Threatening Weather Response	ER-7
Training	2-5
TSCA	
- Regulatory Status	1-3
- Reporting Requirements	ER-2, ER-3, Exhibit B

**CHRYSLER CORPORATION
MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER
ALPHABETICAL INDEX (continued)**

U

Used Oil Regulatory Status	1-4
USEPA	ER-3

W

Warning Signals	Area Plan Drawings
Wisconsin Department of Natural Resources (WDNR)	1-4
Wisconsin Division of Emergency Government	ER-2

EMERGENCY RESPONSE

EMERGENCY RESPONSE

IMMEDIATE NOTIFICATIONS

In **ANY** emergency situation call Security at (414) 747-2200 for an actual or imminent threatening incident or at (414) 747-2010 for a non-threatening incident.

Security shall determine the following information from the person reporting the emergency:

1. The exact location of the emergency,
2. The type and description of the emergency,
3. The extent and nature of any personal injury,
4. The extent of the actual and potential environmental pollution.
5. The extent of any property damage, and
6. Remedial action taken.

In any event, Security shall contact the individuals listed on the Emergency Phone List provided at the front of this plan and follow the procedures as outlined on pages ER-4 through ER-10 of this section of the Episode Plan.

Once the emergency is reported to the Incident Commander, the Incident Commander shall report to the Communication and Command Center (414-747-2337) which shall be set up in the first floor administrative conference room at the west end of Building 3. Should this location be inaccessible, the backup Communications and Command Center will be the Main Gate Guardhouse (414-747-2010) located at the northwest corner of the site.

The Incident Commander shall assess the urgency of the situation and determine if the situation lies within the plant's emergency response capabilities. If not, the appropriate outside emergency agencies shall be contacted.

The Incident Commander or delegated Security personnel shall immediately notify Chrysler Corporate Security Information Center at 876-4933 (Tie Line) or (313) 956-4933 (Outside Line) and Chrysler Corporate Environmental at the dedicated hot-line 1-800-ALERT24 (1-800-253-7824).

Additionally, under certain circumstances, other authorities will require immediate notification. This notification shall be performed by the Incident Commander.

National Response Center

The National Response Center shall be notified immediately at 1-800-424-8802.

- If more than the reportable quantity of a hazardous substance (CERCLA) is released;
- If more than the reportable quantity of an extremely hazardous substance (SARA) is released;
- If a release, fire, or explosion threatens human health or the environment outside the facility;
- If a PCB spill contaminates surface water, sewers, or drinking water;
- If a PCB transformer is involved in a fire; or
- If an oil spill will reach a navigable body of water;

Wisconsin Division of Emergency Government

- If more than the reportable quantity of a hazardous substance (CERCLA) is released;
- If more than the reportable quantity of an extremely hazardous substance (SARA) is released;
- If a RCRA hazardous waste has been released;
- If a PCB spill contaminates surface water, sewers, or drinking water; or
- If a harmful quantity of oil has been released;

Then the Wisconsin Division of Emergency Government shall be notified immediately at 1-800-943-0003.

Local Emergency Planning Committee - Milwaukee County Emergency Government

- If more than the reportable quantity of a hazardous substance (CERCLA) is released;
- If more than the reportable quantity of an extremely hazardous substance (SARA) is released; or
- If the spill causes a sheen on nearby surface waters;

Then the Local Emergency Planning Committee shall be notified immediately at 414-278-4709.

Milwaukee Metropolitan Sewerage District

- If there is a spill or release of any hazardous substance, extremely hazardous substance, RCRA hazardous waste, or petroleum substance into the sanitary sewer system;

Then the Milwaukee Metropolitan Sewerage District shall be notified immediately at 414-282-7200.

OSHA

Corporate Safety shall be notified to ensure proper and timely contact with OSHA.

OSHA must be contacted:

- If a fatality has occurred;
- If a catastrophe has resulted in the hospitalization of three or more people;

Then OSHA shall be notified at 1-414-297-3315 within 8 hours of the incident.

United States Environmental Protection Agency, Region 5

- If a PCB spill contaminates surface waters, sewers, or drinking water; or
- If more than 10 pounds of PCB is released;

Then the USEPA Region 5 shall be notified at 1-312-353-2318.

Reportable quantities and information on hazards of materials can be accessed from Chrysler's HASCON database system (Exhibit E), from the material's supplier, from Corporate Environmental, or from Chrysler Industrial Hygiene.

MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER

SPILL RESPONSE PROCEDURES - Security and Fire Prevention Services

- Security and Fire Prevention Services will monitor facility buildings and grounds for spill conditions while on general and assigned fire/security patrols.
- Upon discovery of a spill condition by Security or other facility employees, the Main Gate Security Guard will be informed of the nature and extent of the spill by calling (414) 747-2200.
- The Main Gate Security Guard will immediately inform the Incident Commander and Security Supervisor of the event, and dispatch available Security personnel to the location of the spill.
- Security will secure the affected area from entry by unauthorized personnel, and provide notification to those personnel who will perform defensive measures as defined for First Responder Operations Level Personnel, OSHA 29 CFR 1910.120.
- If assistance from an outside agency is requested, Security will arrange for an escort to meet that agency at the Main Gate Guardhouse which is located at the northwest corner of the site. (Outside agencies shall be contacted only as directed by the Incident Commander.)
- Security supervision will ensure that the Incident is reported to the Chrysler Center Security Information Center (SIC) at (313) 956-4933 at the earliest opportunity, and will initiate emergency notifications as required in the Security & Fire Prevention Services Manual, Section 5.1, and will coordinate the preparation of reports as required in Section 3.6, Incident Reporting. This manual is located in the Warehouse Manager's Conference Room in Building 3.

MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER

FIRE RESPONSE PROCEDURES - Security and Fire Prevention Services

- Security and Fire Prevention Services will continuously monitor the facility fire protection alarm system(s) for abnormal alarm conditions.
- When notified of an abnormal condition alarm by the offsite central security station, Security will contact the Milwaukee Fire Department (911). Security will dispatch personnel (Security and/or Plant personnel) to check the alarm location and investigate the cause of the alarm. In some cases, this information may be reported directly to the Main Gate Security Guard by an employee already at the location of a fire by dialing (414) 747-2200.
- If an actual fire condition is discovered or reported to Security, all details of the event will be gathered by the Fire/Security Officer receiving the call (location, nature, extent of fire, etc.). Security will contact the Milwaukee Fire Department (911).
- Security will contact the Incident Commander and the Security Supervisor, as listed on the Emergency Phone List.
- Security shall facilitate evacuation procedures as necessary.
- All available Emergency Response personnel will be dispatched to the scene. The Security Supervisor will also arrange for personnel to be dispatched to all three fire pump locations if the main fire pump has been activated. The fire pumps will be shut down only after proper authorization has been received.
- In the event assistance from the Milwaukee Fire Department has been requested, Security will arrange for an escort to meet the Fire Department at the Main Gate Guardhouse which is located at the northwest corner of the site, and lead them to the location of the fire.
- Once on site, the Milwaukee Fire Department will direct activities related to the fire fighting effort.
- Security supervision will ensure that the Incident is reported to the Chrysler Center Security Information Center (SIC) at (313) 956-4933 at the earliest opportunity, and will initiate emergency notifications as required in the Security & Fire Prevention Services Manual, Section 5.1, and will coordinate the preparation of reports as required in Section 3.6, Incident Reporting. This manual is located in the Warehouse Manager's Conference Room in Building 3.

MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER

MEDICAL EMERGENCY RESPONSE - Security and Fire Prevention Services

All medical emergencies shall be immediately reported to Security and Fire Prevention Services at (414) 747-2200.

Upon receiving notification of an on-site medical emergency, the Fire/Security Officer receiving the call will:

- Obtain the name of the caller and the telephone extension used.
- Obtain information regarding the nature and extent of the medical emergency, and the exact location of the person requiring assistance.
- Connect the caller through to 911.
- Notify the Incident Commander.

Fire/Security Officers will assist in medical emergency incidents as required.

In cases where outside emergency services are not immediately available and Security is required to render first aid, the patient will not be moved if there is any potential for aggravating an injury. However, if further injury will immediately result from surrounding conditions (fire, structure collapse, etc.), the patient may be moved from that life threatening condition. Security will assist the patient until arrival of the outside emergency services.

If the incident involves exposure to blood or body fluids, medical personnel shall follow the guidelines outlined in the Chrysler Occupational Safety & Health Manual, Volume 1, Section VIII, MD8, OSHA Standard on Occupational Exposure to Bloodborne Pathogens, 29 CFR 1910.1030, or the Chrysler Occupational Health Services Manual, Section III, No. 8, Guidelines for the Prevention of Transmission of Bloodborne Pathogens. These manuals are located in the Warehouse Manager's Office.

If the injured person is transferred to the local hospital, Security will inform hospital personnel as to the nature of the injury and the identity of any hazardous substances that may have caused the injury.

Security supervision will ensure that the Incident is reported to the Chrysler Center Security Information Center (SIC) at (313) 956-4933 at the earliest opportunity, and will initiate emergency notifications as required in the Security & Fire Prevention Services Manual, Section 5.1, and will coordinate the preparation of reports as required in Section 3.6, Incident Reporting. This manual is located in the Warehouse Manager's Conference Room in Building 3.

MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER

TORNADO/THREATENING WEATHER RESPONSE - Security and Fire Prevention Services

Upon receiving notification of a Tornado Watch or Warning affecting the Milwaukee area, Security and Fire Prevention Services will:

- Contact PDC Management and inform them of the severe weather bulletin, and implement the Spotter procedure (on file in the Security Office) until the Watch/Warning has been canceled.

In the event an actual Tornado is spotted, or a warning of same is received through an authorized source (Sheriff's Department, State Police, etc.), Security will:

- Activate Tornado Warning System upon authorization from the highest ranking member of plant management present, or if delaying the activation of the Warning System could jeopardize employee safety, Security will immediately activate the Warning System. The warning signal for a tornado or threatening weather is made verbally over the facility public address system.
- Announce the following message over the public address system, "ATTENTION - THIS IS A TORNADO WARNING, TAKE COVER IMMEDIATELY". This message will be repeated three times to ensure it is understood.
- If the public address system is out of order, the message will be delivered using the hand held bullhorns assigned to each foreman.
- Provisions of the Warning procedure will be maintained until such time as an "ALL CLEAR" or downgrade to a Watch status is received through an authorized source.
- Communicate the Tornado sighting to the Milwaukee County Sheriff's Department. (Refer to the Emergency Contact List provided in the front of the Plan.)

If the Tornado passes without causing apparent damage or casualties, and cancellation of the Warning has been received through an authorized source, Security and Fire Prevention Services will:

- Coordinate a site inspection for damage or casualties.
- Activate the "all clear" signal.

- Announce the following message over the public address system, "ATTENTION - THE TORNADO WARNING HAS BEEN CANCELLED, YOU MAY LEAVE THE SHELTER AREA". This message will be repeated three times to ensure it is understood.

If a Tornado strikes an occupied building resulting in casualties, Security and Fire Prevention Services will take the following action, in the order listed below:

- Contact the Security Supervisor and dispatch an ambulance as required.
- Notify the Milwaukee Fire Department and St. Luke's Hospital of the event and request assistance. (Refer to the Emergency Contact List provided in the front of the Plan.) Unless otherwise needed, dispatch a Fire/Security Officer to both of these agencies to reinforce the request. If necessary, a Plant representative may be used.
- Initiate the Medical Emergency Procedure (ER-6) and Fire Response Procedure (ER-5) as required.
- Security supervision will ensure that the Incident is reported to the Chrysler Center Security Information Center (SIC) at (313) 956-4933 at the earliest opportunity, and will initiate emergency notifications as required in the Security & Fire Prevention Services Manual, Section 5.1, and will coordinate the preparation of reports as required in Section 3.6, Incident Reporting. This manual is located in the Security Office, which is located in the Warehouse Manager's Conference Room in Building 3.

MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER

ASBESTOS RESPONSE PROCEDURES

1. Security Personnel

- Upon discovery of any damaged presumed asbestos containing material (PACM), generally found in structures built before 1980, Security shall contact the Incident Commander, Environmental Engineer, Safety Administrator, Area Supervisor and Security Supervisor as listed on the Emergency Phone List.
- Security shall secure the affected area from entry by unauthorized personnel, perform defensive measures as defined for First Responder Operations Level personnel (Section 2.1.1, pages 2-2 through 2-3) and shut down operations in the affected area.
- Security and the Incident Commander will proceed with response to the exposure of PACM. Refer to Industrial Hygiene Bulletin IH-3B found in the OSH Manual.
- Security or the Incident Commander shall shut down air handling equipment/systems.
- In the event assistance from an outside agency is required, Security shall arrange for an escort to meet the outside agency at the Main Gate Guardhouse and lead them to the affected location.
- Contact Human Resources/Labor Relations to handle Union notification.
- Security will document the incident after it has been addressed on the incident report form located in Exhibit F.

2. Incident Commander

- Shut down air handling equipment/systems.
- Proceed with PACM response, as applicable. Refer to Industrial Hygiene Bulletin IH-3B found in the OSH Manual.
- Reference the facility asbestos survey for locations, available from the facility Health & Safety representative.
- Contact approved cleanup contractor.
- Verify that the PACM has been repaired and the affected area cleaned. If the conditions have been met, the Incident Commander shall provide the all clear signal to resume plant operations.

- Perform regulatory and Corporate notifications as required (refer to pages ER-1 through ER-3 for these notifications).
- Notify outside response agencies as required (see Emergency Phone List).
- Receive report from Security and retain for future reference.
- Enlist precautionary measures to prevent further occurrence.

3. Facility Personnel

- Notify Security at (414) 747-2200 to report the incident.
- Prevent further deterioration of presumed PACM by ceasing work activities in the area and shut down air handling equipment/systems.
- Evacuate the suspected area.

MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER

ORGANIZATIONAL RESPONSIBILITIES

A. Incident Commander

The Incident Commander is responsible for assessing the emergency and requesting the assistance needed to minimize damage and injuries.

The Incident Commander is responsible for Plant personnel assignments and establishing working zones (hot, warm, cold). It is his/her responsibility to establish and coordinate communications and provide assistance to outside agencies. As a final responsibility he/she must provide Plant Management with a written report describing the emergency and the corrective action taken. An example Incident Commander Checklist is provided in Exhibit F.

B. RCRA Emergency Coordinator

The Emergency Coordinator is primarily responsible for the notification of all appropriate agencies as identified in this plan. He/She will also assist in assessing the extent of the emergency and possible threats to human health and the environment that may result.

C. First Responder Team and Emergency Crew

The Emergency Response Team is responsible for performing the job assignments identified by the Incident Commander/Emergency Coordinator. They are also responsible for maintaining the emergency equipment, the training of the emergency response team, and providing maximum safety to each other and plant employees.

D. Security and Fire Prevention Services

Security personnel are responsible for providing and maintaining emergency communication (including notifications). They must provide traffic (vehicle, personnel) control whenever possible, and perform job assignments as identified by the Incident Commander. They must follow the Security procedures that are outlined in this section of the Episode Plan.

E. Plant Maintenance

Maintenance personnel are responsible for assisting the Incident Commander with facilities issues such as electrical shut-offs, natural gas shutoffs, and specialized maintenance equipment (tractors, blowers, water trucks, etc.). They also have a responsibility to provide information on building and grounds storm drain systems, underground lines and cables and fire protection systems.

F. Outside Fire Response Agency

The outside fire response agencies are responsible for providing fire fighting and emergency rescue assistance to the Incident Commander. Should an outside agency Incident Commander take control of a response situation, Chrysler's facility Incident Commander shall assume a support role and provide the necessary resources to the local Incident Commander in order to mitigate the situation.

G. Outside Medical Response Agency

The outside medical response agencies are responsible for providing additional medical assistance to the Incident Commander/Emergency Coordinator. They are also responsible for clean-up of any medical equipment, bandaging, fluids, etc., and disposal of medical waste created by the emergency. **Note:** All waste material disposal must be coordinated through the Environmental Coordinator.

H. Outside Spill Response Agency

Outside Spill Response Agencies are responsible for performing spill clean-up and containment. They will provide for the transportation and disposal of the waste material (other than medical waste). Marine Pollution Control will be responsible for spill cleanups involving chemical substances and hazardous wastes. Pomroy & Associates will be responsible for cleanups involving asbestos. **Note:** All waste material disposal must be coordinated through the Environmental Coordinator. They will provide assistance for post-incident clean-up required by the Incident Commander.

MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER

EVACUATION PROCEDURES

1. Follow the evacuation instructions given through the emergency evacuation system (plant siren), PA system, telephone, two-way radio, or given directly by authorized personnel. The evacuation signal is a verbal announcement over the public address system.
2. Employees shall evacuate through the nearest available exit.
3. Follow the evacuation routes as posted throughout the facility. Refer to the evacuation route diagrams found in Exhibit C and use the list of evacuation display locations for directions to posted diagrams throughout the facility.

NOTE: When reading evacuation diagrams, be sure to properly orient yourself and note that the north arrow does not always point up.

4. Report to the designated evacuation assembly areas for further instruction.
5. Area Supervisors and Managers will assist personnel to the evacuation areas.
6. The highest ranking member of management present in the evacuation area will take charge of the evacuation area.
7. All personnel in an evacuation area will stand by for further directions given via the PA system, radio, or directly in person.
8. Account for all employees after the emergency evacuation has been completed:
 - (A) The highest ranking member of management present in an evacuation area will forward a head count along with any additional pertinent information to the Communication Centers set up in the first floor administrative conference room at the west end of Building 3.
 - (B) The data from each evacuation area will then be compared to daily records.

MILWAUKEE NATIONAL PARTS DISTRIBUTION CENTER

OFF-SITE SPILL RESPONSE

1. Table 1 is a listing of industries within one mile of the facility which are potential sources of airborne toxic fumes which could force the Milwaukee National Parts Distribution Center to evacuate personnel. The industry's name, location, and phone number are provided. These facilities are either large quantity generators of hazardous waste or report chemical releases under the Toxic Release Inventory (TRI) System. This information was obtained from appropriate Federal data bases by Environmental Data Resources, Inc. (EDR). A copy of the EDR report is provided in Exhibit H.
2. Upon notification from the proper authorities, the Incident Commander should begin appropriate emergency response actions.
3. Table 1 also provides a list of schools and hospitals within one mile of the facility. These are potential receptors for airborne toxic emissions. The Incident Commander should consider the impact of any emergency action response on these receptors and be prepared to act accordingly.

**TABLE 1
OFF-SITE SOURCES AND RECEPTORS**

Potential Sources	Address	Phone Number
None		
Potential Receptors	Address	Phone Number
Dover Street School	619 East Dover Street	482-0535
Trowbridge St. School	1943 E. Trowbridge	482-1155
St. Lucas Lutheran School	648 East Dover Street	483-3774
Humboldt Park School	3230 S. Adams Avenue	482-2620
Bay View High School	2751 S. Lenox	744-9840
Sacred Heart School	3641 S. Kinnickinnic	744-2843
Deer Creek Elementary	3680 S. Kinnickinnic	481-0700
St. Paul's School	3945 S. Kansas Avenue	482-4790
Fernwood School	3239 S. Pennsylvania Ave.	482-0123
St. Veronica School	341 E. Norwich Street	744-1214
Clement Avenue School	3666 South Clement Ave.	482-2720
Fritsche Middle School	2969 S. Howell Avenue	481-6720
Tippecanoe School	357 East Howard Avenue	769-3220
Children's Edu-Care	Euclid at Clement Ave.	781-3636
Thomas More High School	2601 E. Morgan Avenue	481-8370
St. Francis Seminary	3257 S. Lake Drive	747-6400

Section 2 PLANT-WIDE EMERGENCY MANAGEMENT

This section addresses the following areas of emergency management:

- Preparedness
- Emergency Response; and,
- Reporting Requirements

The Preparedness subsection identifies the facility's capabilities in terms of trained personnel, emergency equipment, in-place incident command structure, hazardous material information system (HASCAN), and availability of outside assistance to respond to an emergency.

The Emergency Response subsection specifies responsibilities of plant personnel during an emergency. An Evacuation Plan and Emergency Response Flow Charts are provided in the Exhibits Section of this Episode Plan.

The Reporting Requirements subsection identifies what types of emergencies must be reported to government agencies and which agencies to contact. An Episode Report form provided in Exhibit F of this document is to be used in filing written reports to appropriate agencies and Corporate Environmental.

2.1 Preparedness

2.1.1 Emergency Incident Command Structure

The Milwaukee National Parts Distribution Center is required to designate individuals who will be responsible for coordinating response to an emergency. The required roles which must be filled are as follows:

- OSHA Incident Commander
- RCRA Emergency Coordinator
- CERCLA Emergency Response Coordinator
- Oil Pollution Prevention Contact

The Milwaukee National Parts Distribution Center has designated a primary and alternate Incident Commander who will serve all four roles. The primary contact along with alternate contacts and their phone numbers are provided on the following page. The Incident Commander will assume the leadership role during an emergency incident. This person has the authority to commit all necessary resources and manpower to effectively respond to the incident.

INCIDENT COMMANDER AND ALTERNATES

Name	Title	Plant Phone Number
Primary: William Nessler	Maintenance/ Security Supervisor, Hazardous Waste Coordinator	747-2010
Alternates: John Denzine Al Fehrmann Daniel Baker Pat Horvath	Office Manager Facilities Engineer PDC Manager Plant Safety Manager	747-2323 747-2306 747-2308 747-2348

Home phone numbers and addresses for the above individuals are maintained in the Main Gate Guardhouse.

First Responder Awareness Level

All Chrysler personnel are trained to this level. First Responder Awareness personnel's primary function is one of notification. Upon discovering a spill or other emergency, First Responder Awareness personnel should immediately notify Security at (414) 747-2200. This notification should consist of the location of the emergency, the type of emergency (i.e. spill, fire, personal injury, etc.), the source of the emergency (if applicable), the severity of the incident (volume of spill, size of fire, etc.), personnel in the area of the incident, and any actions taken prior to notification. Following the notification, First Responder Awareness personnel should take defensive action such as keeping nearby personnel away from the area until the Incident Commander arrives and takes charge. First responders at the awareness level should always stay a safe distance away from the spill.

First Responder Operations Level

First responders at the operations level are trained to respond to spills and other emergencies. These personnel will respond to an emergency in their area under the direction of the Incident Commander.

First responders at the operations level are trained to respond to spills in a defensive manner without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures. They are capable of using the spill response equipment located throughout the facility for this purpose. First Responder Operations Level personnel are not trained to make contact with or clean up spills.

If the First Responder Operations Level personnel discovers an emergency situation, his or her first action should be to notify Security at (414) 747-2200. First Responder Operations personnel should act on the instructions of the Incident Commander to respond to and mitigate the emergency.

In the event of a spill, the response activities should begin by surrounding the spill area (from a safe distance) with barricades and/or warning tape to prevent nearby personnel from entering the spill area. Following this, an attempt should be made to minimize the spread of the spill by placing absorbent material in the path of the spilled liquid and/or around catch basins or floor drains. First Responder Operations personnel should always avoid exposure and/or have appropriate personal protective equipment (PPE). Following containment of the spill, an outside contractor should be contacted to remove and clean up the liquid. If necessary, the Incident Commander or delegated personnel should contact an outside spill response contractor upon discovery of the spill.

In the event of a fire/explosion, the most important actions to be taken include the protection of facility personnel. If the fire is small, it should be promptly extinguished using one of the fire extinguishers mounted throughout the facility. Otherwise, the building and adjacent areas should be evacuated and the Milwaukee Fire Department should be contacted to extinguish the fire.

In the event of a personal injury, First Responder Operations personnel should be directed by the Incident Commander before entering an affected area to give the victim medical attention. Actions that should be taken include contacting medical staff and/or an ambulance and applying first aid as appropriate.

First Responder Operations personnel responding to an incident involving exposure to blood or body fluids shall follow the guidelines outlined in the Chrysler Occupational Health Services Manual, Section III, Guidelines for the Prevention of Transmission of Bloodborne Pathogens (located in the Warehouse Manager's Office). This guideline is also located in the company Occupational Safety and Health Manual, Volume 1, Section VIII, Bulletin MD8.

First Responder Operations personnel should always first contact Security, who will then contact fire/medical response teams as necessary.

2.1.2 HASCON System

The Milwaukee National Parts Distribution Center has access to the Chrysler HASCON computer system. Chrysler Hazard Communication Sheets (HCSs) and Labels can be accessed by computer. This system is capable of accessing all materials in the HASCON database and providing all safety related information. Complete instructions on how to use the online system are provided in Exhibit E.

The terminals and printers used with the Chrysler Human Resources Safety System (CHRSS) have access to the online HCS program as well as any other terminal which can access Outer Drive IMS (ODIMS).

Data available in HASCON for all products used at this location includes:

- Product information
- Ingredients
- Physical data
- Fire and explosion data
- Health hazard data
- Reactivity data
- Spill or leak procedures
- Special protection
- Special precautions
- Waste labeling information

This information is also available in hard copy in the Main Gate Guardhouse which is located at the northwest corner of the site, and at locations noted within the individual area plans.

The HASCON System can be accessed by authorized personnel who have received an entry password. Authorized personnel at the Milwaukee National Parts Distribution Center include the Incident Commander, Parts Distribution Center Manager, Facilities Engineer, Maintenance/Security Supervisor, and Plant Safety.

2.1.3 Emergency Equipment

A complete list of emergency equipment including a description and the storage location is provided in Table 3 (pages 2-5 through 2-6). The Maintenance Department and the Maintenance/ Security Supervisor are responsible for maintaining all emergency equipment to ensure it is in adequate supply and operable condition.

2.1.4 Decontamination

Due to the fact that Milwaukee National Parts Distribution Center employees are trained only to the First Responder Awareness Level, decontamination of emergency equipment, including clothing, will be provided by the outside spill response contractor. All waste disposal shall be coordinated through the Environmental Coordinator.

2.1.5 External Arrangements

As required under 40 CFR Part 265, Subpart C, the Milwaukee National Parts Distribution Center has made arrangements with the following external agencies for assistance in responding to an emergency.

EXTERNAL ARRANGEMENTS

Agency	Phone Number	Location
Milwaukee Fire Department	911 or (414) 347-2323	711 West Wells Street Milwaukee, WI 53233
Milwaukee Police Department	911 or (414) 765-2323	741 West State Street Milwaukee, WI 53233
Milwaukee County Emergency Government	(414) 278-4709	821 West State Street Milwaukee, WI 53233
St. Lukes Hospital	(414) 649-6000	2900 West Oklahoma Milwaukee, WI 53215
Marine Pollution Control	(313) 849-2333 (800) 521-8232	8631 West Jefferson Detroit, MI 48209-2691
John Pomroy & Associates (asbestos only)	(810) 549-6086 pager (810) 830-3676	4116 Seminole Drive Royal Oak, MI 48073

A description of each agency's emergency response role and a certified agreement between the facility and the agency is provided in Exhibit D.

2.1.6 Training

A summary of regulations requiring training, a description of the training, and personnel trained is provided in Table 4 (located at the end of this section). Internal training records are kept in the Warehouse Manager's Office.

2.2 Emergency Response

A complete facility Emergency Response Plan is provided in the front of this Episode Plan (see red tab).

2.3 Reporting Requirements

This Episode Plan includes Emergency Response Action Flowcharts (Exhibit B) which detail all the proper response actions and notifications required under the applicable Federal, State, and Local regulations. For any episode which occurs, a Corporate Incident Report must be submitted to Corporate Security Information Center. A complete list of all local, state, and federal reporting requirements is provided in the Emergency Response section provided in the front of this Episode Plan (see red tab).

If the Incident Commander determines that the facility has had a release, fire, or explosion which could threaten human health or the environment, then the Emergency Response Action Flowcharts (Exhibit B) will be consulted as necessary to satisfy the notification requirements.

**TABLE 3
EMERGENCY EQUIPMENT LIST**

Type of Equipment	Storage Locations	Description
Fire Alarm System	Manual pull stations placed near primary and secondary emergency exits located throughout all buildings.	Manually actuated fire alarm system. Fire risers contain water flow sensing devices. Activation will initiate an alarm signal monitored by offsite central security station.
Sprinkler Systems (Wet and Dry)	All buildings at plant have a wet sprinkler system except Building 8 which has a dry sprinkler system and Building D which has a foam suppression system.	Equipped with electric alarms. Signal monitored by offsite central security station.
Fire Extinguishers	Throughout the facility and in emergency vehicles.	<p>Water - 2.5 gallon (Class A fires - combustible materials, wood, paper, etc.)</p> <p>Dry Chemical - 10 lb (Class A, B, C fires - oils, combustibles, flammable liquids, electrical)</p> <p>CO2 - 5/15 lb (Class C fires - electrical)</p>
Fire Hoses	Throughout facility.	Fire hoses drop 50 to 100 feet of 1.5-inch line with variable spray nozzles
Safety Shower/ Eyewash Stations	<p>(1) fixed station in Building D.</p> <p>(2) fixed stations at Battery Charging Area in Building 6.</p> <p>(5) fixed stations in Battery Charging Room (Building 1B)</p> <p>(1) portable station at Paint Room in Building 6 (eyewash only).</p>	Stationary and portable combination eyewash/shower stations with continuous flow for decontamination.

**TABLE 3
EMERGENCY EQUIPMENT LIST (continued)**

Type of Equipment	Storage Locations	Description
Spill Response Equipment	Maintenance Department Building D	1-piece disposable respirators, dust only rubber boots, XL, acid resistant plastic aprons chemical splash goggles hard hats, white rain pants, XL rain jackets, XL rubber gloves, acid resistant 85-gallon steel overpack drums 55-gallon 6 mm plastic bags shovels, non-sparking Tyvek suits rolls 3-inch "caution" tape absorbent booms/pads, oil only
Plant Paging System	Plant wide - various labeled telephone extensions	Operated by telephone message. Telephone extensions with paging capability are labeled accordingly.
Public Address System	Guard Shack (Outside) Computer Room (Building 5) Main Office (Building 3) Maintenance (Building 7)	Announcing emergencies throughout plant.
Two-Way Radios	Plant Security Plant Management Plant Supervisors Plant Maintenance	For communication within plant.
First Aid Station	TRACS Room (Building 1A) Computer Room (Building 5)	Medical supplies used by Emergency Response Team.

**TABLE 4
TRAINING PROGRAMS**

Regulation	Description of Training	Groups Trained
OSHA 29 CFR 1910.120 First Responder Operational Level	Training provided to individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for purposes of protecting nearby persons, property or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures. A minimum of eight hours of training is required for this level of response plus refresher training.	Emergency Response Team Plant Security
OSHA 29 CFR 1910.1200 Hazard Communication	Employers are required to train their employees regarding: 1) methods and observations used to detect the presence or release of a hazardous chemical in the work area; 2) physical and health hazards of chemicals; 3) personal protection measures; 4) details of the hazardous communication program; and, 5) interpretation of Material Safety Data Sheets. Annual refresher required for all personnel.	Entire Plant (at time of hire)
OSHA 29 CFR 1910.120 First Responder Awareness Level	Training provided to individuals who are likely to witness or discover a hazardous substance release. Responder shall be trained to initiate the emergency response sequence by notifying appropriate plant personnel.	Entire Plant (annually)
OSHA 29 CFR 1910.120 On-Scene Incident Commander	Training provided to incident commanders who will assume control of an incident scene. A minimum of 24 hours of training is required.	Parts Distribution Center Manager Facility Engineer Maintenance/Security Supervisor Environmental Coordinator

**TABLE 4
TRAINING PROGRAMS**

Regulation	Description of Training	Groups Trained
OHS 29 CFR 1910.156 Fire Brigades	Annual training provided to assure that fire brigade members are capable of performing their assigned duties during a fire.	Plant Security Fire Emergency Response Organization
RCRA-40 CFR 265.16(a)	Training provided to employees working in areas where hazardous waste is generated, stored, or transported. The program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, equipment, and systems.	Parts Distribution Center Manager Facility Engineer Maintenance/Security Supervisor Environmental Coordinator Plant Safety Supervisor Emergency Response Team Plant Maintenance
DOT Hazardous Material Transportation Training	Training provided to employees who are involved with hazardous waste preparation, shipping and transportation. This training fulfills HM 181 requirements.	Maintenance/Security Supervisor Environmental Coordinator Plant Safety Supervisor Plant Maintenance Shipping Supervisor Plant personnel associated with labeling of hazardous waste and shipping/receiving operations
40 CFR 112 - SPCC Training	One person is accountable for oil spill prevention. This person is responsible for the effective implementation of the Spill Prevention Control and Countermeasure Plan on an ongoing basis.	Emergency Response Coordinator

EXHIBIT G

OSHA REQUIREMENTS OUTLINE

This exhibit outlines OSHA requirements as they apply to the facility, and describes where these requirements are addressed in the Episode Plan.

29 CFR 1910.38(a) EMERGENCY ACTION PLAN

1. Emergency escape procedures and emergency escape routes assignments.
 - Emergency escape procedures are addressed in the Emergency Response Section and the individual area plans.
 - Emergency escape routes are addressed in the evacuation drawings provided in Exhibit C.
2. Procedures to be followed by employees who remain to operate critical plant operations.
 - Procedures are addressed in the Emergency Response Plan and in the individual area plans.
3. Procedures to account for all employees after evacuation.
 - Procedures are addressed on page ER-13 of the Emergency Response Plan.
4. Rescue and medical duties for those employees who are to perform them.
 - Duties are discussed on page ER-6 of the Emergency Response Plan.
5. Preferred means of reporting fires and other emergencies.
 - Addressed in Emergency Response Plan and individual area plans.
6. Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan.
 - Provided on Emergency Phone List in front of plan and in Section 2.1.1.

29 CFR 1910.120 (q) HAZWOPER EMERGENCY RESPONSE PLAN

1. Pre-emergency planning and coordination with outside parties.
 - This Episode Plan is used for pre-emergency planning. Designated emergency response personnel review the Episode Plan and become aware of their roles in an emergency situation.

- Arrangements with outside agencies are addressed in Section 2.1.5 (page 2-4) and in Exhibit D.
2. Personnel roles, lines of authority, training, and communication.
 - Personnel roles are addressed within the entire Emergency Response Section (specifically pages ER-11 and ER-12), Section 2.1.1 (pages 2-1 to 2-3), and in Exhibit B, Figures 1 and 2.
 - Lines of authority are addressed in the entire Emergency Response Section and in Section 2.1.1 (pages 2-1 to 2-3).
 - Training requirements are addressed in Section 2.1.6 (page 2-5) and in Table 4.
 - Communications are addressed in the entire Emergency Response Section as well as within the specific Area Plans.
 3. Emergency recognition and prevention
 - Emergency recognition is addressed in the Emergency Response Section and the specific Area Plans.
 - Emergency prevention is addressed in Section 2.1 (pages 2-1 to 2-5) and within the specific Area Plans.
 4. Safe distances and places of refuge
 - Evacuation procedures are addressed on page ER-13, in Exhibit C, and within the specific Area Plans.
 5. Site security and control
 - Addressed within entire Emergency Response Section.
 6. Evacuation routes and procedures
 - Addressed on page ER-13, in Exhibit C, and within the specific Area Plans.
 7. Decontamination
 - Addressed on page 2-4 and within specific Area Plans.
 8. Emergency medical treatment and first aid
 - Addressed on page ER-6 and in Section 2.1.5 (pages 2-4 through 2-5).

9. Emergency alerting and response procedures

- Addressed within entire Emergency Response Section, in Section 2.2 (page 2-5), and in specific Area Plans.

10. Critique of response and followup

- Addressed in Exhibit B - Figure 2, in Exhibit F - Episode Report Outline, and in Section 1.4 (page 1-6).

11. Personal protection and emergency equipment

- Addressed within Section 2.1.3 (page 2-4), Table 3, and specific Area Plans.

29 CFR 1910.119 Process Safety Management of Highly Hazardous Chemicals

- Regulation does not apply.

29 CFR 1910.1003ff Chemical Specific Requirements

- Regulation does not apply.