



# STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

*Jim Gibbons, Governor*

*Allen Biaggi, Director*

*Leo M. Drozdoff, P.E., Administrator*

May 26, 2010  
Erin Merrill  
Recology  
50 California Street, 24th Floor  
San Francisco CA 94111 9796

Reference: With respect to Recology Application to Construct and Operate a Solid Waste Landfill

Subject: Review of Volume III Plan of Operations (Plan)

Dear Ms. Merrill:

The Nevada Division of Environmental Protection (NDEP) has reviewed the following sections of the Plan and has both questions and comments:

- Section 3.0 Equipment and Personnel
- Section 4.0 Fire Control Program
- Section 13.0 Contingency Plan
- Section 14.6 Training Program

Upon review the NDEP has specific concerns related to both the remoteness of the site and the impact this may have on the ability of response personnel (fire, medical, law enforcement) to respond in the event of an onsite incident and its concomitant impact on site personnel. Specifically, establishing site worker safety protocols will be paramount in the review process. The current plans are disconnected and may not provide the level of worker safety necessary due to the complexity of the site.

As this site will be operational during the night please include specifics to operations during this time. By example please note that NAC 444.684(4) requires a specific "plan of action", section 13.1 does not provide a hierarchical system or list a series of specific steps to be taken in the event of an emergency. Nor does it establish who or how a particular reaction would be determined with level of responsibilities, nor offer gathering points, or evacuation routes etc. Do the hazards at this site in conjunction with its' relatively remote location (and associated response time) necessitate an Emergency Medical Technician on site at all times?

Accordingly the NDEP is, in accordance with NAC 444.641(1) and NAC 444.677(9), requiring the following. Please incorporate all employee training, contingency plans, fire and emergency response, documentation of events and records into a single Integrated Sitewide Contingency Plan [ISCP] (guidance document outline enclosed).

1. The job title for each position at the facility related to waste management, and the title of the employee filling each job;
2. A written job description for each position listed above. This description must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;
3. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed above.
4. Establish records that document that the training and ongoing training or job experience required above has been given to, and completed by, facility personnel.

5. Establish a Sitewide Emergency Coordinator (with alternates) that has specific authorities to at a minimum;
  - Activate facility alarms or notification system for employee's onsite
  - Notify local authorities as necessary
  - Activate the Integrated Sitewide Contingency Plan
  - Complete any other actions necessary to secure the site and ensure the safety of personnel
6. Documentation of arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of solid waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes.
7. If more than one police and/or fire department may respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority.
8. Arrangements to familiarize local hospitals with the properties of waste or potential incidents at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.  
If local authorities decline to enter into such arrangements, please document the refusal in the operating record

Further, if employees are to be required to engage in a fire fighting activity, or any other activity outside of the normal course of site operations (waste management operations), the training program must include this. The NDEP will not approve a plan that does not provide comprehensive training for employees for any activity they may be required to perform both within and without the normal course of their duties. In review of the re-submitted documents the NDEP will be using OSHA documents 3317-06N 2006 and CPL 02-02-073 for guidance.

Please provide a response by September 30<sup>th</sup> 2010. Any questions regarding this may be directed to the undersigned at 775-687-9477 or jtaylor@ndep.nv.gov.

Sincerely,

*Original Signed*

Jon Taylor PE CEM  
Staff Engineer III  
Solid Waste Branch  
Bureau of Waste Management

JT:jm

Enc: [Integrated Contingency Plan Outline Document](#)

cc: Therese A. Ure, P.O. Box 12527, Portland, OR, 97212  
Kenneth Haskell PE, 1009 Enterprise Way Suite 350, Roseville, CA, 95678

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