



## Significant Spills, Leaks or Other Releases

### Instructions:

Include the description and dates of any incidences of significant spills, leaks or other releases that resulted in discharges of pollutants to waters of the U.S., through storm water or otherwise; the circumstances leading to the release and actions taken in response to the release; and measures taken to prevent the recurrence of such releases (see Part 2.1.2.4 of the 2008 MSGP)

**Date/Time of Incident:** 10/26/2010 8:00 am

**Job # and Name:** 11533 Tronox Soil Remediation of Zones B and D

**Location of Incident:** RZ-D-15-21

**Description of Incident:** October 25 to October 27, 2010. NDEP has raised numerous issues regarding our exclusion zone control, decon procedures for both equipment and personnel, track out on internal road and 4th and 5th Street, and PPE required during equipment decon (i.e. wet decon).

**Circumstances Leading to Release:** Inadequate decon of equipment leaving the exclusion zone, and inadequate personal decon stations and equipment.

### Action Taken:

**Site Control:** LVP has agreed to improve their exclusion zone access and egress. All equipment and personal will enter and leave the exclusions zones through decontamination zones. LVP will make every effort to limit equipment access through a single point. Unless we run into unanticipated problems, all equipment within the exclusion zone will remain in the exclusion zone, all clean equipment (e.g. fueling trucks, soil transport trucks) will remain in the clean zone. The exception to this procedure are the water pulls and water trucks that will be decontaminated prior to leaving the exclusion zone. Additionally, we will have the required street sweeper operating during all soil transport operations to address track out on internal roads, 5<sup>th</sup> Street, and 4<sup>th</sup> Street.

**Decontamination:** LVP has set up much better decon stations at each exclusion zone. All personnel and equipment will leave the exclusion zone through these decon stations. LVP will utilize a dry decon procedure for both personnel and equipment except for those instances when wet is essential.

**Personnel Decon:** Dry decon will consist of a boot brush station. Wet decon will consist of a three bucket wet boot wash. A washing station for employees to wash their hands and face will be utilized for both dry and wet decon procedures. LVP will supply necessary PPE, water, paper towels, garbage cans, etc. to support this effort. Wash water will be placed on soil stockpiles slated for disposal.

**Equipment Decon:** Dry decon will consist of removal of accumulated material on equipment and trucks with shovels and brushes. Soil removed from vehicles during dry decon operations will be periodically removed to minimize cross contamination. We will maintain the same procedures at soil loading stations. Trucks will be inspected as they are loaded, and excess material will be brushed off the truck. Accumulated soil on trucks will be removed with shovels and brushes, and soil material spilled onto the ground surface will be periodically scrapped to minimize cross contamination. LVP will have dedicated staff focused on both equipment decon and decon zone maintenance. Dry decon is preferred as our primary decon option.

**Wet decon:** Pressure washing may be utilized. However, this decision will require a shift in our approach. If pressure washing is used, the decon will be performed within a lined and bermed containment area designed to capture all wash water (i.e. drain to a sump pump). The wash water will be containerized and sampled for disposal. All personnel performing a wet decon will wear appropriate PPE including a water resistant suit (i.e. Tyvek or Saranex), rubber boots, nitrile or rubber gloves, a face shield/goggles, etc.).