

# FMC Pocatello Plant

## RCRA Pond Area Work Rules

*Revised December 16, 2009*

**SCOPE:** These work rules pertain to ALL PERSONNEL (including, but not limited to FMC, contractor, and/or regulatory personnel) entering the RCRA Pond Area. These work rules are also intended to provide written training prior to entry of the RCRA Pond Area. FMC expects that all personnel will do their jobs in compliance with all applicable OSHA and EPA requirements. FMC reserves the right to immediately eject from the premises any person not working safely or to bar entry to any person lacking proper safety training or proper safety equipment or evidencing impairment.

**BACKGROUND:** Nearly all Plant buildings have been demolished. All of the RCRA ponds have been closed in accordance with EPA-approved Closure Plans. Certification of each pond closure has been provided to EPA so all of the RCRA ponds are now in post-closure care and monitoring. Safety requirements in the RCRA Pond Area have changed now that the Plant is closed and all ponds are in post-closure care and monitoring. The number of personnel working in the RCRA Pond Area is now minimal and some people may be working alone. Since FMC no longer has 24/7 coverage of the RCRA Pond Area, safe entry and exit procedures have changed. Fencing and gates around the RCRA ponds will be maintained. However, gates should now be left OPEN when working in the RCRA Pond Area to facilitate safe exits. Phosphine monitors will continue to be available but will only be required for specific tasks but are not required for general entry to the RCRA Pond Area.

### **GENERAL WORK RULES FOR THE RCRA POND AREA**

The following work rules must be adhered to in the RCRA Pond Area:

1. All personnel entering the Plant site must sign in and out at the FMC Log-In Center located near the Main Entrance Gate.
2. Personnel entering the RCRA Pond Area must inform their designated safety liaison person before entering the RCRA Pond Area and have a currently signed copy of these rules on file with FMC.
3. Personnel exiting the RCRA Pond Area must inform their designated safety liaison by direct contact or by cell phone that they have exited the RCRA Pond Area.
4. Personnel working alone in the RCRA Pond Area must check in with their designated safety liaison at the top of each hour. **CHECK-IN IS THE RESPONSIBILITY OF THE PERSON WORKING ALONE IN THE RCRA POND AREA.** If there has been no check-in with the safety liaison, other available personnel will attempt to contact that person. If no contact is made, the safety liaison will investigate to ensure that the person is safe.
5. All personnel working in the RCRA Pond Area must have training meeting the requirements of the OSHA HAZWOPER standard (found at 29 CFR 1910.12) to be provided by their employer. Training shall include hazards that could be encountered at FMC, including potential exposure to phosphine gas (including Item #13 below). FMC may require evidence of such training prior to entry.
6. Personnel entering the RCRA Pond Area must have a cell phone capable of summoning assistance if needed. (NOTE: There are "dead spots" around the RCRA Pond Area so cell phone checks are advisable for personnel not familiar with these dead spots.) The cell phone number must be provided to the designated safety liaison. Any person or group of workers joining a work crew already in the RCRA Pond Area must also have a cell phone.
7. Personnel entering the RCRA Pond Area must have the following personal protective equipment (PPE) - shirt, full-length pants, safety shoes, and safety glasses. Any other PPE (such as hard hat, respirator, or hearing protection) is TASK SPECIFIC – to be determined after a safety review prior to entry. FMC may require a written report on any safety review prior to entry.
8. Training of personnel on the proper use and limitations of PPE is the responsibility of the respective employer. FMC may require evidence of appropriate training prior to entry.

9. No smoking is allowed in the RCRA Pond Area.
10. Any gate used to enter the RCRA Pond Area should be left **OPEN** while personnel are in the RCRA Pond Area in order to facilitate a quick exit, if necessary.
11. Gates must be **CLOSED** when work is completed and all personnel exit the RCRA Pond Area. The last person or crew leaving the RCRA Pond Area will check that all entry gates used that day have been shut and locked.
12. Most of the RCRA ponds were closed in place with protective engineered covers installed. Also, there are buried power and gas lines in the area. **NO MECHANICAL OR HAND DIGGING IS ALLOWED BEYOND A 12 INCH DEPTH WITHOUT CONDUCTING A CHECK OF DRAWINGS AND CONDUCTING A SAFETY REVIEW PRIOR TO PERFORMING ANY DIGGING** (similar in scope to preparing a Plant Digging Permit). FMC may require a written report on any safety review prior to entry.
13. Phosphine monitors are NOT required for routine entry to the RCRA Pond Area. The use of portable phosphine monitors is TASK SPECIFIC, i.e., a phosphine monitor shall be carried by any person performing work that might result in an exposure to phosphine gas above the OSHA PEL of 0.3 ppm. Examples of such work would be checks of temperature and pressure monitoring equipment and servicing of phosphine gas extraction systems. Please read #14 below.
14. The following work rules regarding phosphine gas will be followed. The use of portable phosphine monitors is TASK SPECIFIC, i.e., a phosphine monitor shall be carried by any person performing work that might result in an exposure to phosphine gas above the OSHA PEL of 0.3 ppm. Examples would be checks of temperature and pressure monitoring equipment and servicing of phosphine gas extraction systems. Safety reviews will be conducted to determine if specific tasks require carrying a portable phosphine monitor.
  - Phosphine monitors are available from the Plant O&M contractor – KW. Contact Mark Smith at 681-8227 if your work requires a phosphine monitor.
  - Any person required to carry a portable phosphine monitor will be provided hands-on training on the proper use of the monitor by their safety liaison or FMC representative.
  - Any person performing work that might result in an exposure to phosphine above 0.5 ppm can only perform that work in the RCRA Pond Area with a “buddy”.
  - Phosphine monitoring “trigger levels” are:
    - If readings show less than 0.3 ppm, the task may proceed without restrictions.
    - If readings indicate the phone level is between 0.3 ppm and less than 1.0 ppm, task work will be restricted to 5-hours maximum.
    - If readings attain 1.0 ppm and are sustained at this level (or higher) for longer than 5 minutes, exposed workers must relocate to positions upwind of the original task area. This upwind area must have sustained readings below 0.5 ppm phosphine.
    - If workers in the upwind area need to re-enter the original work area after relocation, the original task area must be checked prior to re-entry. When approaching the original task area, the area should not be re-entered if phosphine readings are at or above 0.5 ppm. The person taking any reading prior to re-entry should not proceed further into the area once his/her monitor shows a concentration of 0.5 ppm or higher level during the approach. Work in the original task area can resume when readings in the original task area have decreased to less than 0.3 ppm.
  - If any worker feels they have experienced an overexposure to phosphine, they shall leave the RCRA Pond Area as quickly as possible and then notify their safety liaison or an FMC representative. Emergency response or a health care follow-up and/or an exposure assessment will then be arranged as appropriate.

## WORK RULES SPECIFIC TO POND 16S

**BACKGROUND:** Pond 16S (located along the north side of the RCRA Pond Area) has accumulated phosphine gas under the cap. This gas is controlled by a Gas Emission Treatment System (GETS). The proper operation of the Pond 16S GETS is subject to a Unilateral Administrative Order (UAO) issued by EPA to FMC in December 2006. Compliance with the UAO requires work rules specific to Pond 16S.

The following site specific work rules must be adhered to at Pond 16S:

1. All personnel working on Pond 16S will enter the RCRA Pond Area at the North Gate to the RCRA Pond Area (nearest entrance to Pond 16S).
2. A phosphine monitor shall be carried by any person performing work individually around Pond 16S or by at least one member of a work crew. Phosphine monitors are available from the Plant O&M contractor – KW. Contact Mark Smith at 681-8227 if your work requires a phosphine monitor.
3. The UAO requires immediate corrective action and immediate notification of any emergency situation or threat to public health or the environment. This includes phosphine gas concentrations exceeding 0.3 ppm from the piping or GETS process. Any worker measuring phosphine at 0.3 ppm or observes a release (such as a rupture disk break, etc.) must notify their immediate supervisor immediately. FMC staff (or other designated emergency coordinator) is responsible for notifying EPA.
4. The soil cover on top of Pond 16S is part of an engineered protective cover. Personnel working on top of Pond 16S should minimize the possibility of soil erosion or damage to existing monitoring equipment, such as settlement monuments located at several locations around Pond 16S.
5. To facilitate operation of the Pond 16S GETS process and to minimize potential erosion or other impacts to the Pond 16S cap, a road (the Pond 16S Cap Road) has been built on the top of the Pond 16S cap for vehicle traffic. Vehicles must stay on this road.
6. There are numerous pipes, valves, and monitoring equipment close to the road. Vehicle drivers must be cautious when driving or parking on the Pond 16S Ca Road. Large vehicles (over 4 wheels) must have a spotter when backing up on this road.

7.

## CERTIFICATION

I have been provided with a copy of these RCRA Pond Area Work Rules. I have read the rules, understand the information provided, and agree to comply with these rules. I have received the necessary training specified in these RCRA Pond Area Work Rules.

I understand that I am responsible for my safety and the safety of those around me.

SIGNATURE:

PRINTED NAME:

DATE:

(This form is valid for 6 months and then must be renewed.)

EMPLOYER:

CELL PHONE NUMBER (required only if used for communication while working in the RCRA Pond Area):