Contingency Plan

DISCLAIMER

This Contingency Plan is intended to provide guidance during emergency situations to operators participating as a collection site in the British Columbia Light Recycling Program.

The procedures described in the Contingency Plan are not intended to replace any standards, acts or regulations required under Local, Provincial or Federal law; nor is the Contingency Plan intended to relieve the collection site operator or staff of requirements under the law.

Product Care Association of Canada ("Product Care") accepts no responsibility and assumes no liability resulting from the incorrect use of information contained in the Contingency Plan or from the use of this information in any circumstances other than those described.

Further information about environmental requirements can be obtained from your local BC Ministry of Environment and Climate Change Strategy office.

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As a collection site for the Light Recycling Program, a contingency plan is required under the BC Hazardous Waste Regulations. This plan satisfies this requirement for Product Care Programs ONLY. If you collect other materials considered hazardous onsite, you will require contingency plan that includes those materials.

1. EMERGENCY PLANNING, ORGANIZATION, AND RESOURCES

1.1. Identification of Hazards and Risks

PRODUCT TYPE	RISK	INCIDENT
Fluorescent/HID lamps	Environmental contaminant	Spill/breakage
Light fixtures – Lithium batteries	Potentially flammable	Fire

Intact (unbroken) fluorescent lamps (CFLs and fluorescent tubes) and HID lamps pose no health risk. Mercury in fluorescent lamps is in vapour form and also with the phosphor powder which coats the inside of the light bulb. Broken lamps release the mercury, which can enter the body by absorption through the skin or by inhalation of the vapour.

HID lamps contain more mercury than fluorescent lamps (30 mg on average). The mercury is sealed in a sealed glass or quartz capsule (referred to as an "ampoule" or "arc tube") within the lamp. If the capsule remains intact the mercury is contained. However, if the ampoule is broken mercury will be released to the ground.



In both cases a careful and prompt cleanup of the spill by the designated worker will minimize exposure to the staff, customers and to the environment.

A mercury spill must be treated as a serious safety concern. Staff should be trained in the management of broken lamps and the use of a spill kit.



NOTE: no health risks are posed from broken incandescent, halogen or LED lamps other than risk of cutting by broken glass.

1.2. Legislation and Industry Standards

Regulation	Section reference	Requirement
Hazardous Waste Regulation	42.3, 42.4	Contingency plan
Spill Reporting Regulation	Schedule	Spill reporting
Transportation of Dangerous Goods	8.2	Spill reporting
Regulations		

1.3. Emergency Organization and Responsibilities

The following personnel have been appointed to carry out actions in accordance with the Contingency Plan:

Primary Emergency Response Co-ordinator (ERC)

Name	
Title	
Office Number	
Home Number	
Cell Number	

Alternate Emergency Response Co-ordinator

Name	
Title	
Office Number	
Home Number	
Cell Number	

The Emergency Response Coordinator (ERC) or an alternate must be available 24 hours a day.

1.4. Resources

Product Care provides each collection site with a spill kit to deal with emergency spills of program products. It is the operator's responsibility to ensure the spill kit contains all of the required supplies originally provided and is accessible to collection site staff at all times. Spill kits come equipped with:

- 6 x Sealable Plastic Bags each containing:
 - Eye dropper
 - o Cardboard pieces
 - Disposable gloves
 - Disposable masks
- 1 x roll of Packing tape



If there is a spill and you use the materials, contact Product Care to obtain supplies to restock your spill kit.

1.5. Training and Practice Drills

Employees are required to review the Contingency Plan. Managers are recommended to perform annual testing of the procedures at a minimum.

2. EMERGENCY RESPONSE

2.1. Summary of Emergency Response Procedures

2.1.1. Spills/Breakage

If you break a fluorescent lamp (CFL or fluorescent tubes) or HID lamp, follow these directions for clean-up:

- 1. Leave the room
- 2. <u>Ventilation</u>:
- Ventilate the room by opening windows and doors to the outdoors.
 - This will ensure that the mercury vapour levels are reduced before you start cleaning.

2.1.2. Fire or Explosion

In the event of a fire at the collection site, the person who discovers the fire will immediately initiate the response plan as follows:

- 1. Set off the fire alarm.
- 2. **Notify** all personnel in the vicinity of the fire and direct them to evacuate the area.
- 3. **Contact** the primary or alternate ERC directly or request nearby personnel to notify the ERC immediately.
- 4. **Contain** the fire using available fire protection equipment *only* if the fire is small or manageable.
- 5. **Clear** the area and allow the Fire Department access. Persons at workstations are responsible for shutting down equipment as they evacuate, provided it is safe to do so.

2.2. DETAILED RESPONSE PROCEDURES

2.2.1. Spills/Breakage

If you break a fluorescent lamp (CFL or fluorescent tubes) or HID lamp, follow these directions for clean-up:

3. Leave the room

- Leave the room and keep people out from the room during the clean-up process.
- Avoid stepping on broken glass

4. Ventilation

- Ventilate the room for at least 15 minutes prior to starting clean-up by opening windows and doors to the outdoors.
 - This will ensure that the mercury vapour levels are reduced before you start cleaning

5. Clean-up

- Do **<u>NOT</u>** use a vacuum or broom to clean up the initial breakage.
 - This will spread the mercury vapour and dust throughout the area.
 - Additionally, contamination may occur within the vacuum and/or on the broom.
- Wear disposable gloves to avoid direct contact with mercury and to reduce the risk of cuts.
- Scoop or sweep up the broken pieces and debris with the two pieces of cardboard provided in the clean up kit and place into the sealable plastic bag.
 - Work from the outside of the spill to the centre.
 - \circ Use the cardboard to gather the beads of mercury.
 - Tip- a flashlight held at a low angle in a darkened room can be used to find beads of mercury which can travel quite far on a hardened surface.
- Use eyedropper to collect mercury and then squeeze carefully into a damp paper towel.
 - Repeat this step as often as necessary to cover the affected area thoroughly.

- Place the paper towel into the same sealable plastic bag (note this is only required for HID lamps with a visibly broken ampoule).
- Use packing tape to pick up smaller beads and place in plastic bag.
 - Note this is only required for HID lamps with a visibly broken ampoule.
- Residual mercury can be removed by wiping with vinegar followed by peroxide.
 - Note this is only required for HID lamps with a visibly broken ampoule.
- Keep the area well ventilated for 24 hours.
- Place the broken glass and all clean-up materials in the plastic bag and seal it to further minimize the release of mercury vapour.
- All contaminated items and mercury should be double or triple bagged.
- Once the clean-up effort is completed, place the sealed bags in a sturdy container (plastic container, glass jar etc.) and then place the container in a bulb box.
- Wash your hands after storing and disposing of waste.

NOTE: These procedures based off the recommended procedures from Health Canada that are at the following link: <u>https://www.canada.ca/en/health-</u> <u>canada/services/health-risks-safety/radiation/everyday-things-emit-</u> <u>radiation/compact-flourescent-lamps.html#a6</u>

2.2.2. Fire or Explosion

- 1. Notify a staff member who will then notify the Emergency Response Coordinator or alternate ERC. Set off the fire alarm.
- 2. The Emergency Response Co-ordinator will then ensure the following actions occur:
 - Call Fire Department (911)
 - Evacuate all other personnel to the rendezvous point
- 3. If the **FIRE IS MANAGEABLE**, the Emergency Response Co-ordinator will supervise the response team in the following:
 - Bearing down on fire with available extinguisher
 - Ensuring all process equipment is turned off
- 4. If the **FIRE IS RAPIDLY EXPANDING OR OUT OF CONTROL**, all personnel will be evacuated to the marshalling area indicated below:

Evacuation and Assembly Point

In the event of an evacuation due to emergency, all personnel will collect at the primary marshalling area indicated below:

Description of the primary marshalling area location

5. If the primary marshalling area is not safe due to wind direction or for other reasons, all personnel will proceed to the secondary marshalling area indicated below:

Description of the secondary marshalling area location

Personnel must remain at the marshalling location until otherwise directed by the Emergency Response Co-ordinator (ERC). The ERC will perform a head count at the marshalling area to ensure all personnel are accounted for.

- 5. Emergency Response Co-ordinator will take a head count at the marshalling area to ensure all employees are accounted for.
- 6. When the Fire Department arrives, all necessary assistance will be given to the Fire Department under the direct supervision of the Emergency Response Co-ordinator.

3. Notification

3.1. Product Care

Report any incident to Product Care (24 hrs) at 1-888-772-9772

After reporting the incident, complete the Emergency and/or Incident Report Form with all the details of the spill and send it to Product Care immediately:

Fax: 604.592.2982

Email: bcdispatchlights@productcare.org

The report form is in appendix A of this plan.

3.2. Regulatory

3.2.1. Fire

If the incident is a fire, note that all fire incidents are reported to the regulatory agencies below:

Provincial Emergency Program (PEP) 1-800-663-3456 (24-hr)

WorksafeBC 1-866-621-7233 (8am - 5pm) OR 1-866-922-4357 (after hrs)

APPENDIX A

LIGHT RECYCLING – INCIDENT REP	ORT	
Only fill out this incident report if five (5) or n	nore lamps were broken at on	e tim
Depot Name		
Depot Address		
Telephone Number		
Date of Incident Time of Incide	nt	
# of Lamps Broken [] Five (5) [] Six (6) to nine	e (9) [] 10+ [] Box drop	oped
If the box dropped and resulted in broken glass, please an	nswer the following questions:	
Did any broken glass spill onto the floor? [] Yes [] No	
Did the box drop during: [] Packing [] In-sto	re movement [] Shipping	
Please describe the incident (use additional paper if need	ed):	
Was anyone injured? [] Yes [<i>If yes, please attach a copy of the WCB Form and Record</i> = What are your suggestions to help prevent this type of inc	J No to this report. ident from happening in the futu	re?
Please complete the information and fax or mail (and other form	ns if applicable) to Product Care.	
The mailing address, email, fax and telephone number are	:	000
420 - 2238 Yukon Street, vancouver BC, V5Y 3P2 bcdispatchlights@productcare.org	PHONE: 1-888-811	982 -6234
Employee Name	Signature	
Manager Name	Signature	
BC Light Recycling Program - Collection Site Guidelines for Residential, I	nstitutional, Commercial and Industrial I	.amps