

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb

Governor

Brian C. Rockensuess

Commissioner

July 1, 2024

VIA EMAIL

Mr. Brandon Martin Assistant Maintenance Manager Dicks Sporting Goods Distribution Center 655 S Perry Rd Plainfield, IN 46168

Re: Violation Letter

Dicks Sporting Goods Distribution Center

INR000138768

Plainfield, Hendricks County

Dear Mr. Martin:

On 6/19/2024, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Dicks Sporting Goods Distribution Center, located at 655 S Perry Rd, Plainfield, IN. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Compliance Evaluation Inspection

Results of Inspection: Violations were discovered and require a submittal.

Within thirty (30) days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements listed in the inspection report, must be submitted to this office. Failure to respond adequately to this Violation Letter may result in a referral to the OLQ Enforcement Section. Please direct any response to this letter and any questions to Kaleb Spears at kspears@idem.in.gov or (317) 903-1822. Thank you for your attention to this matter.

Kau a Clevengo

Sincerely,

10

Susan Lowry Section Chief

Hazardous Waste Compliance Section



Compliance Branch

Enclosure

cc: Hendricks County Health Department



HAZARDOUS WASTE INSPECTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Inspector's Name:	Kaleb Spears
Others Present	N/A
Date:	Wednesday, June 19, 2024
Time In:	10:19 AM
Time Out:	12:28 PM
Inspection Type	Compliance Evaluation Inspection

		Genera	al Informat	ion		
Facility Information						
Facility Name	Dicks Sportin	g Goods	Distribution	Center		
Facility Location	Plainfield, IN	55 S Perry Rd Plainfield, IN 46168 Iendricks County				
Facility Mailing Information	Same Addres	s as Fac	ility			
Facility Contact	Jeffrey Cherry Maintenance Jeffrey.Cherry	Manage				
Primary Facility Contact During Inspection	Brandon Martin Assistant Maintenance Manager 317-837-0200 Ext:2819 Brandon. Martin@dcsg.com					
	Salutation	First Name	Last Name	Title	Phone Number	Email
Other Facility Contact(s) During Inspection	Mr.	Jason	Kennedy	Senior Manager of DC Operations	317- 561- 2149	jason.kennedy@dcsg.com

Facility ID			
EPA ID Number	INR000138768	NAICS Code	459110
Facility Status			
File Status	Small Quantity Generator	Other Activities	
	·	1	
Outstanding Issues			
Last Inspection Date	N/A		
Previous Violations	C Yes No		
Details	Not Previously Inspected		

Inspection Narrative

On June 6th, 2024, Kaleb Spears (Environmental Manager) from the IDEM Office of Land Quality conducted a routine compliance inspection (CEI) at Dicks Sporting Goods Distribution Center. Kaleb Spears (IDEM) arrived onsite at 10:19 am and met with Brandon Martin (Assistant Maintenance Manager) and Jason Kennedy (Senior Manager of DC Operations). A brief introduction explained the purpose of the inspection and what facility areas and operations would be looked at by IDEM staff. The inspection itinerary consisted of an opening conference, a facility tour, and a closing conference.

Dicks Sporting Goods Distribution Center is a distribution center located in Plainfield, Indiana. Hazardous Waste is produced from processed returns from surrounding Dicks Sporting Goods outlet stores that are shipped to the distribution

Kaleb Spears 19, 2024 Page 1 of 8 Dicks Sporting Goods Distribution Center/Wednesday, June

center and/or damaged products from the distribution center. The facility is approximately 720,000 square feet and has an operating schedule comprised of two shifts, 6:30 am-3:30 am and 6:30 am - 7:50 pm. The primary hazardous waste streams produced onsite include aerosols (D001), flammable liquids (D001 and D018), and universal waste batteries and fluorescent lamps.

Areas observed during the inspection include the maintenance area and the central accumulation area (CAA). In the CAA, the accumulation start date for a container of universal waste nickel-cadmium batteries was not the container and not recorded anywhere. No emergency information sign was posted in the area (Photo #3). In the maintenance area, two 4-foot bulb boxes were not properly closed at the time of inspection (Photo #4).

After the facility tour, a document review was conducted onsite. Documents reviewed include manifests, annual reports, the emergency response plan, training records, safety data sheets (SDSs), and weekly inspection logs. Upon review of the emergency response plan, IDEM staff determined that while the facility was not required to have a contingency plan, the emergency response plan listed no one specific person as the emergency coordinator. Facility representatives Brandon Martin (Assistant Maintenance Manager) and Jason Kennedy (Senior Manager of DC Operations) noted that Jeffery Cherry (Maintenance Manager) was likely to be the facility emergency coordinator for the site but was unavailable at the time of inspection. A violation for 40 CFR 262.16(b)(9)(i) is being cited at this time (see description of violations (DOV) below for details and required action(s)). No documentation showing arrangements with local authorities was available for review during the inspection.

A closing conference was held where a summary of preliminary findings was shared with Dicks Sporting Goods Distribution Center staff. Violations were discovered and will require correction submittals to be submitted to Kaleb Spears at KSpears@idem.in.gov within thirty (30) days from receipt of this report.

Regulatory Status				
Observed Activity	Small Quantity Generator	Other Activities		
Documents Reviewed	Manifests Emergency Response Plan Training Records Annual Report Weekly Inspection Logs Safety Data Sheets			
Comments	See inspection narrative	and DOV for details		

Waste Management

Waste Stream(s) Inform	Vaste Stream(s) Information				
Waste Streams ○ Yes ○ No ○ No	Waste Streams				
List waste stream(s) informa onger generated, significan			ample: additional wa	ste streams, waste streams no	
EPA Waste Codes	Description	Source	Generation Rate	Disposition	
D001 - Ignitable	Aerosol Waste	Maintenance/Returns	0.5 gal/month	Clean Earth Environmental Solutions	
D001 – Ignitable, D018 – Benzene	Off-spec product/ Processing	Returns	30 pounds/month	Clean Earth Environmental Solutions	
Non-hazardous	Mineral Spirits	Maintenance (Parts Washer)	Variable	Heritage Crystal Clean Inc.	
Universal Waste -	Fluorescent Bulbs	Maintenance	Variable	Clean Earth	

Kaleb Spears 19, 2024

Comments:

Page 2 of 8 Dicks Sporting Goods Distribution Center/Wednesday, June

Lamps								Environmental Solutions
Universal Waste - Batteries		cel Cadr d Acid	mium/	Mainte	nance/Ret	urns	Variable	Clean Earth Environmental Solutions
Used Oil	Use	Used Oil Maintena		nance		Variable	Clean Earth Environmental Solutions	
Exempted/Excluded	(e)	res 🖺	No 🗇	Not Insp	ected 🗀	Not Appl	icable	
-	Exp	lanatio	n					
Explanation	Scra	ap Meta	I 329 IAC	3.1-6-4				
Waste Management A		•						
Container Manageme		(s) (e	Yes	○ No	Not inspe	ected C	Not applica	ible
EPA Waste Codes	11171100	Locati	on	Number	Size	Type of	Container	
Universal Waste - Bat	teries	CAA		1	5-gallon	Plastic		
Universal Waste – La		Mainte	nance	2	Boxes	Cardboa	ard	
Satellite Area(s)	•			Not inspe	ected 🖸	Not appli	cable	
. ,	Location		Comme					
	Mainte		No comi					
Tanks, Restricted Wa								
Environmental Releas		tion/Dis	scharges	O Y	es 🕟 No	Release	e Observed	
Violoio i torouoco, con	-							
				Compli	ance Assi	stance		
P2 Information				•				
The following P2 suggest assessment, or a voluntal http://www.in.gov/idem/52	ry techni	cal assis	stance con	sultation fr				ı might consider having a P2 ency's P2 web site at
Contact by IDEM OPF	TA Re	queste	d 🌅	Yes 📧	No			
P2 Suggestions					•			
Guidance Materials								
Guidance Materials P	rovide	d to Fac	cility E	mergency	y Information	on Sign		
			(Check		Checklist icates a com	nliance co	ncern)	
Standards			(Onleak	ou-sox mu			quirements	
☐ Hazardous Waste	Determ	nination			☐ TSDF Permit Requirements			
Recordkeeping (S	QG and	l LQG)			☐ Other Violation			
☐ Identifying Hazard	ous Wa	ste Nur	mbers (So	QG and				
Valah Chaara				Dama 2 a	f O Diales	Chartina	Canda Diatri	bution Contar/Modesaday Jun

Kaleb Spears 19, 2024 Page 3 of 8 Dicks Sporting Goods Distribution Center/Wednesday, June

LQG)	
☐ Generator Category Determination	
☐ Notification (SQG, LQG, Transporter, TSDF)	
Release to the Environment, Disposal of Solid Waste	
☐ Illegal Dumping	
☐ Other Violation	
LQG Hazardous Waste Standards ☐ Accumulate for 90 Days or Less	SQG Hazardous Waste Standards ☐ Accumulate for 180 Days or Less
☐ Container Condition	☐ Accumulation Limit
☐ Compatibility of Waste with Container	☐ Container Condition
☐ Containers Closed	☐ Compatibility of Waste with Container
☐ Container Handling	☐ Containers Closed
☐ Central Accumulation Area Inspection	☐ Container Handling
☐ Ignitable or Reactive Wastes - Distance from	Central Accumulation Area Inspections
Property Line	☐ Conditions for Accumulation of Incompatible Wastes
☐ Ignitable or Reactive Wastes - Sources of Ignition/Reaction: "No Smoking" signs	Container Labeled "Hazardous Waste"
☐ Conditions for Accumulation of Incompatible	Container Marked with Indication of Hazards
Wastes	Container Marked with Accumulation Start Date
☐ Container Labeled "Hazardous Waste"	☐ Tank Operating Conditions
☐ Container Marked with Indication of Hazards	☐ Tank Inspections
☐ Containers Marked with Accumulation Start Date	☐ Tank Labeled "Hazardous Waste"
☐ Tank Integrity Assessment	☐ Tank Marked with Indication of Hazardous
☐ Tank Containment and Detection of Releases	☐ Tank Documentation for 180-Day Accumulation
☐ Tank General Operating Requirements	☐ Land Disposal Restrictions
☐ Tank Inspections	☐ Maintenance and Operation of Facility
☐ Tank Subpart BB - Monthly Pump and Valve	Required Equipment
Monitoring	☐ Testing and Maintenance of Equipment
Tank Subpart CC - Annual Inspection/Monitoring	☐ Access to Communications or Alarm System
Tank Labeled "Hazardous Waste"	☐ Aisle Space
Tank Marked with Indication of Hazards	☐ Arrangements with Local Authorities
☐ Tank Documentation for 90-Day Accumulation	Arrangements with Local Authorities - Documentation
Maintenance and Operation of Facility	
Required Equipment	
Testing and Maintenance of Equipment	☐ Employee Training
Aisle Space	☐ Other Small Quantity Generator Standards
Arrangements with Local Authorities	VSQG Standards
☐ Arrangements with Local Authorities -	Hazardous Waste Generation Limit

Kaleb Spears 19, 2024

Documentation	☐ Hazardous Waste Accumulation Limit
☐ Contingency Plan Developed	☐ Hazardous Waste Determination
☐ Content of Contingency Plan	☐ Proper Disposal
☐ Copies of Contingency Plan	☐ Prohibited Disposal of Liquids in Landfills
☐ Contingency Plan Quick Reference Guide	
☐ Emergency Coordinator	
☐ Personnel Training Program	
☐ Personnel Training - Complete Within Six Months	
☐ Personnel Training Annual Review	
☐ Personnel Training Documentation	
☐ Personnel Training Record Retention	
■ Notification for Closure	
☐ Land Disposal Restrictions	
☐ Large Quantity Generator - Other Violations	
Satellite Accumulation – SQG and LQG	Manifest and Recordkeeping - LQG and SQG
Quantity Limits, Point of Generation, Under Control of Operator	Manifest General Requirements
Container Condition	☐ Use of the Manifest
☐ Compatibility with Container	
☐ Incompatible Wastes	
Containers Closed	
☐ Container Labeled "Hazardous Waste"	
☐ Container Marked with Indication of Hazards	
☐ Preparedness and Prevention	
□ Excess Generation	
Episodic Generation	Hazardous Secondary Materials
Notification	Reclaimed Under Control of the Generator
EPA ID Number	Contained
Accumulate for 60 Days or Less	Speculative Accumulation
Accumulation Prohibitions	Notice
Container Labeling	Documentation of Legitimacy Determination
☐ Tank Labeling and Recordkeeping	Emergency Preparedness and Response
Recordkeeping	Emergency Procedures (Accumulates 6,000 kg or Less)
Preparedness and Prevention	Emergency Procedures (Accumulates Greater than 6,000 kg)
Other Violation	Other Violation

Solvent-Contaminated Wipes – Disposal Container Management (Non-leaking containers)	Solvent-Contaminated Wipes - Laundered or Dry Cleaned Container Management (Non-leaking containers)
☐ Closed Containers	☐ Closed Containers
☐ Labeling	☐ Labeling
☐ Accumulation Time	☐ Accumulation Time
☐ No Free Liquids	□ No Free Liquids
☐ Free Liquids Management	☐ Free Liquids Management
☐ Documentation	□ Documentation
☐ Final Disposition	☐ Clean Water Act
Universal Waste – All Facilities Universal Waste Labeling	Used Oil – All Facilities ☐ Rebuttable Presumption Applies
Containers - Closed, Good Condition, No	Containers and Tanks in Good Condition
Evidence of Leaks	☐ Containers/Tank Labeling
Universal Waste - Bulb Crushing Prohibition	Release Clean Up and Containment
✓ Universal Waste – Accumulation Start Date	☐ Burning Restrictions - Generated On-site or DIY, .5M BTU

Description of Violation(s)

UNIVERSAL WASTE - ALL FACILITIES

CONTAINERS - CLOSED, GOOD CONDITION, NO EVIDENCE OF LEAKS

CITATION:

40 CFR 273.13 (Containers-closed, good condition, no evidence of leaks): A universal waste handler must contain wastes in containers that are in good condition, compatible with the waste, closed, and lack evidence of leakage.

DETAILS:

Two 4 foot cardboard boxes, located in the maintenance area containing "Universal Waste - Lamps" were not properly closed (Photo #4).

REQUIRED ACTION:

Maintain universal waste in containers that are in good condition, compatible with the waste, closed, and lack evidence of leakage. Submit correction submittals to KSpears@idem.in.gov thirty (30) days from receipt of this report.

UNIVERSAL WASTE ACCUMULATION START DATE

CITATION(S):

40 CFR 273.15(c) - A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:

- (1) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;
- (2) Marking or labeling each individual item of universal waste (e.g., each battery or thermostat) with the date it became a waste or was received;
- (3) Maintaining an inventory system on-site that identifies the date each universal waste became a waste or was received;
- (4) Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received;

Kaleb Spears 19, 2024 Page 6 of 8 Dicks Sporting Goods Distribution Center/Wednesday, June

- (5) Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or
- (6) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

DETAILS:

One 5-gallon container containing universal waste batteries had no accumulation dates listed and no other documentation was available that showed the date of accumulation (Photos #1-2).

REQUIRED ACTION:

Correctly identify the accumulation start date on the container and dispose of Universal Waste in the above-mentioned details. Submit manifest(s) indicating waste has been shipped off to the appropriate treatment, storage, and disposal facility. Manage future Universal Waste(s) according to the standards in 40 CFR 273.15(c) and 40 CFR 273.15(a). Submit correction submittals to KSpears@idem.in.gov thirty (30) days from receipt of this report.

SQG HAZARDOUS WASTE STANDARDS

ARRANGEMENTS WITH LOCAL AUTHORITIES - DOCUMENTATION

CITATION:

40 CFR 262.16(b)(8)(vi)(B): A small quantity generator shall maintain records documenting the arrangements with the local fire department as well as any other organization necessary to respond to an emergency. This documentation must include documentation in the operating record that either confirms such arrangements actively exist or, in cases where no arrangements exist, confirms that attempts to make such arrangements were made.

40 CFR 262.16(b)(8)(vi)(C): A facility possessing 24-hour response capabilities may seek a waiver from the authority having jurisdiction (AHJ) over the fire code within the facility's state or locality as far as needing to make arrangements with the local fire department as well as any other organization necessary to respond to an emergency, provided that the waiver is documented in the operating record.

DETAILS:

Dicks Sporting Goods Distribution Center - Plainfield at the time of inspection did not have the required documentation for arrangements with local authorities.

REQUIRED ACTION:

Ensure the required documentation for arrangements with local authorities is maintained in the facility's operating record. Submit correction submittals to KSpears@idem.in.gov thirty (30) days from receipt of this report.

EMERGENCY COORDINATOR

CITATION:

40 CFR 262.16(b)(9)(i): At all times there must be at least one employee on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (b)(9)(iv) of this section. This employee is the emergency coordinator.

DETAILS:

Dicks Sporting Goods Distribution Center - Plainfield at the time of inspection did not have a designated emergency coordinator onsite based upon review of the emergency response plan.

REQUIRED ACTION:

Designate a hazardous waste emergency coordinator that is on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified. Submit correction submittals to KSpears@idem.in.gov thirty (30) days from receipt of this report.

EMERGENCY INFORMATION POSTED

CITATION:

40 CFR 262.16(b)(9)(ii): The small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste: (A) The name and phone number of the emergency coordinator; (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and (C) The telephone number of the fire department, unless the facility has a direct alarm.

Kaleb Spears 19, 2024 Page 7 of 8 Dicks Sporting Goods Distribution Center/Wednesday, June

Dicks Sporting Goods Distribution Center - Plainfield at the time of inspection did not have the required emergency information posted in the CAA (Photo #3).

REQUIRED ACTION:

Post the required emergency information next to the telephones or in areas directly involved in the generation and accumulation of hazardous waste. Submit correction submittals to KSpears@idem.in.gov thirty (30) days from receipt of this report.

	Inspection Documentation
Photographs	○ No
Мар	○ Maps
GPS Location	C Yes
Collected	No No
Analytical Screening	C Yes
Conducted	No No
Lab Sample	C Yes
	No No

	Inspection Results/Actions	
Comments:		
Inspection R	esults	
Violations were discovered and require a submittal.		
Multi-Media	Concerns	
No concerns	noted	

Finalize Inspection			
Written Summary of Inspection			
	Printed/Typed Name	Kaleb Spears	
	Phone Number:	(317) 903-1822	
Inspector Information	Email Address:	kspears@idem.in.gov	
	Signature:	Obtained on the Inspection Verification/Findings Form	
	Printed/Typed Name:	Brandon Martin	
Facility Representative Signature	Signature:	Obtained on the Inspection Verification/Findings Form	

Photo Table: Dicks Sporting Goods Distribution Center

5		1
e jander	Hazardous Waste Universal Waste soon it commission start if so it soon Commission soon in the soon is soon in the soon in	240%
	Plantones, box stem: 12 A CU BATTERM NVST HAVE TERMINALS ON ENDS "APPED" O AVOID CONTACT Ousshold Cull Eveloyde, 800-819-770 THS CONTAINER MIST BEAAN (LOSED EXCEPT WHIT MUSE.	
W by		
11-11-1		

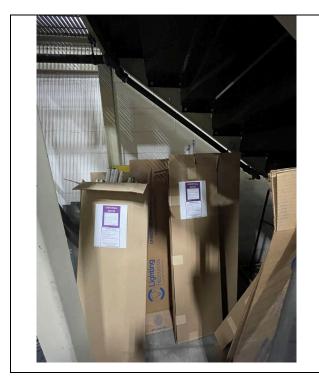
Number	1	
Description	One 5-gallon container containing universal waste batteries had no accumulation dates listed and no other documentation was available that showed the date of accumulation (Photos 1 of 2)	
Photographer	Kaleb Spears (IDEM)	
Facility Name	Dicks Sporting Goods Distribution Center	
Photo Date	06/19/2024	
Others	Brandon Martin (Dicks Sporting Goods Distribution Center)	



Number	2		
Description	One 5-gallon container containing universal waste batteries had no accumulation dates listed and no other documentation was available that showed the date of accumulation (Photos 2 of 2)		
Photographer	Kaleb Spears (IDEM)		
Facility Name	Dicks Sporting Goods Distribution Center		
Photo Date	06/19/2024		
Others	Brandon Martin (Dicks Sporting Goods Distribution Center)		

ins and the second

Number	3	
Description	Dicks Sporting Goods Distribution Center - Plainfield at the time of inspection did not have the required emergency information posted in the CAA.	
Photographer	Kaleb Spears (IDEM)	
Facility Name	Dicks Sporting Goods Distribution Center	
Photo Date	06/19/2024	
Others	Brandon Martin (Dicks Sporting Goods Distribution Center)	



Number	4	
Description	Two 4 foot cardboard boxes, located in the maintenance area containing "Universal Waste - Lamps" were not properly closed.	
Photographer	Kaleb Spears (IDEM)	
Facility Name	Dicks Sporting Goods Distribution Center	
Photo Date	06/19/2024	
Others	Brandon Martin (Dicks Sporting Goods Distribution Center)	

INSPECTION VERIFICATION/FINDINGS

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue Indianapolis, Indiana 46204-2251

Telephone: (800) 451-6027 or (317) 232-8603 Web Page: http://www.in.gov/idem/

On 6/19/24 an inspection of high Station Environmental Management (IDEM), Office of Lar	dishibution (whe undersigned representant Duality	ative of the Indiana Department of
Type of Inspection (may include more than one)	•	
Routine Compliance Evaluation Follow Up Inspection Compliance Assistance Inspection Inspection Findings:	☐ Complaint ☐ Multi-Media Screening Eva	
	ntify specific compliance issues discovered during the attion of a statute(s), rule(s) or permit(s) issued by IDEM.	
Violations were discovered but corrected during	ittal from you and/or follow-up inspection by IDEM. ou to an appropriate enforcement response. valuate overall compliance.	
	**********	*******
department for which confidential treatment is reinformation. A person may request confidential the department, such as inspections. The written for accurate identification of the information claimformation must be submitted to the commission confidential is acquired by the department. A perinformation and the supporting information to wildentify all confidential claim materials. Confidentials, photographs, or samples (see definition or alleged information acquired during this inspection the "does" box is not a written claim for confidential confidentials.	gov/legislative/iac/T03290/A00061.PDF) a person subsequested shall make a written claim of confidentiality treatment of information at the time the information is claim for confidential treatment may be broad, but mimed to be confidential. In accordance with 329 IAC once within five (5) working days from the time the increase submitting a claim of confidentiality shall design which the claim applies in a manner that is sufficiently ential information may include (but is not limited to) of information at 329 IAC 6.1-2-8). The undersigned in does does not (check one) contain confidential treatment of information acquired during this einspection was provided to the undersigned Owner/Ag atters discovered during the inspection that the IDEM restricted to the confidential treatment. The report does not include matters not evident eckless violation.	y at the time of submittal of the is acquired through the actions of must be sufficiently clear to allow 6.1-4-1(d), supporting information claimed as mate and segregate the y clear to allow the department to written or printed material, maps, Owner/Representative has onfidential information. A check is inspection.
DEM Representative: Kale Sycars Printed Name Sign Phone Number Em	MSpears@idem, IN, gov	C/19/24 Date 10, 09/12,28 pm Time In/Out
Owner/Representative: Jeso Kenness Finted Name Sig Phone Number Em	Jason. Kennedy @ dcsg.	Sr Mar of Ope Com blig124

Emergency Information

For purposes of complying with 40 CFR 262.34 generators who generate between 100 kilograms and 1000 kilograms of hazardous waste per month must post the following information next to the telephones used for emergency communication at hazardous waste accumulation areas:

EMERGENCY COORDINATOR	Name:	
	Telephor	ne Number:
TIRE DEPARTMENT	Name:	
	Telephor	ne Number:
EMERGENCY EQUIPMENT Fire Extinguishers have been	n placed at t	he following locations:
		,
Spill Control Material 1. Absorbent Materia 2. Shovels/Brooms 3. Over pack Drums 4. Personal Protective 5 6 Fire Alarms have been place	e Equip.	Location ———————————————————————————————————

REPORT ENVIRONMENTAL EMERGENCIES

IDEM

National Response Center

1-888-233-7745

1-800-424-8802





EMERGENCY RESPONSE PLAN

Dick's Sporting Goods

Distribution Center - Consolidated

Revision: 04.12.2024 Supersedes: 09.16.2019

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Appendix

- (A) ERP Incident Report
- (B) ERP Bomb Threat Checklist Telephone Procedures
- (C) ERP Assembly Area and Tornado Shelter Area
- (D) ERP Critical Phone Numbers

I. Purpose

The U.S. Department of Labor defines an Emergency Response Plan as "the actions employees should take to ensure their safety if a fire or other emergency situation occurs". Properly developed Emergency Response Plans (also known as ERPs) ensure that the result of an emergency will be less employee injuries, less structural damage, and less business loss.

This emergency response plan is designed to protect employees during emergency situations, including fires, chemical spills, natural disasters, and bomb threats. It is the responsibility of every teammate in the building to familiarize themselves with the plan, and their role in an emergency. Teammates should review and follow these procedures. Supervisors and Managers must ensure that their teammates are familiar with these procedures. Additionally, managers, supervisors, and teammates should know the location of fire exits and alarm systems in the areas in which they work.

The information contained herein is not all-inclusive. New threats and hazards may present themselves at any time. Because of these anticipated changes, this manual should be reviewed and updated every 12-months by the Training and Safety Specialist.

II. Evacuation Procedures

In the event that the building needs to be evacuated, the evacuation alarm (or alarm/siren) will sound. Exit immediately through the nearest exit door.

Please be aware of the nearest exit. Maps are located in each department and throughout the building. Contact loss prevention or your supervisor if you have any questions. Remember to stay clear of the building and all entrances and take special caution not to block fire lanes, hydrants or walkways so that emergency vehicles and personnel can safely reach the distribution center.

A. Accounting for Teammates

Once you have exited the building, report immediately to the designated assembly area (see Appendix) and report to your supervisor. Supervisors will retrieve their department's on-premise report from the front desk teammate or Loss Prevention and compare the reporting teammates to the on premise report to verify that all teammates have exited the building. When applicable, the Receptionist will be responsible for verifying that all visitors and temps are accounted for. All discrepancies should be immediately reported to the Active Shift Manager. All reports should be submitted to HR after re-entry.

B. Teammates Requiring Special Assistance

Teammates who may require special assistance should contact their supervisor in advance of an emergency to allow proper arrangements and planning. These teammates may be assigned companions for evacuation assistance and should begin evacuation immediately upon notification and/or alarm sound.

C. Emergency Medical Treatment

The Distribution Center's First Responders have been trained on CPR, First Aid, AED operation, and handling Blood Borne Pathogens. The First Responders will be responsible for providing emergency first aid, on an as needed basis, until emergency personnel can arrive. First Responders are limited in providing only the minimal level of care needed to stabilize an injured teammate until professional help arrives.

D. Site Security

Loss Prevention is responsible for the security of the Distribution Center and ensuring that teammates do not re-enter the building until it has been deemed safe.

III. Active Shift Manager

The Active Shift Manager is responsible to ensure the assigned supervisor is completing all tasks during the emergency. Each emergency will produce different tasks that need to be completed.

Active Shift Manager will determine if facility shutdown and early release of teammates is necessary.

The Active Shift Manager is also the main contact to communicate with local authorities during an emergency and responsible for notifying senior management and corporate contacts as soon as possible if needed.

All media inquires should be directed to the corporate office. Corporate office will assign a representative to be the contact with the media.

This person needs to remain available to assist other supervisors during the emergency. This includes not becoming involved in one specific task.

Active Shift Manager is defined as the senior operations Director/Manager currently on-site or his/her delegate.

IV. Hazardous Materials / Substances / Gas Leaks

Should a container of hazardous material/substance become damaged causing a release of the product, without endangering yourself or others, do the following.

If imminent danger including natural gas leak

1. Evacuate the building immediately per the evacuation procedures

If no imminent danger:

- 1. DO NOT COME IN CONTACT WITH THE MATERIAL OR SUBSTANCE.
- 2. Without endangering yourself or others, get as much information from the carton or product as possible, including the vendor, product name and chemical name.
- 3. Block off the area so others do not get near. If the substance is in a trailer shut the trailer door(s), shut and lock the dock door. Have the trailer pulled to an isolated area.
- 4. Keep all individuals out of the immediate area at all times.
- 5. If there are any injuries or illnesses reported as a result of exposure, communicate this to Management and Loss Prevention immediately.
- 6. Follow all information from the Safety Data Sheet (SDS). If necessary, contact 3E at 800-451-8346 for a SDS and contact local authorities if needed.
- 7. Follow DSG protocol for handling hazardous materials spill.
- 8. DO NOT put anything over or on the substance, unless directed to by the SDS information or by professional personnel.
- 9. When disposing of the substance, do so following all local, state and federal guidelines.
- 10. If the building is ordered to evacuate, follow the DC Evacuation Procedure.
- 11. DO NOT re-enter the building or area until it has been cleared and declared safe for occupation.

Is building evacuation necessary?

Active Shift Manager shall follow the following steps:

If ves:

- 1. Contact 911.
- 2. Evacuate the building following the Evacuation Procedures.
- 3. Managers and supervisors will verify that all areas of the building have been evacuated.
- 4. Secure building to prevent re-entry until emergency response personnel arrive.
- 5. Contain all merchandise (pallets, cartons, units) and do NOT process until emergency response team releases the area/building.

If no:

- 1. Contact 911.
- 2. Direct teammates to a cleared area (cafeteria, conference room).
- 3. Isolate area to prevent contamination.
- 4. List all teammates that were working in the area.
- 5. Seek assistance of First Responders, if necessary.
- 6. Contain all merchandise (pallets, cartons, units) and do NOT process until emergency response team has released the area.

Communicate the teammate list and location of suspicious materials/substances

1. Upon arrival of emergency response personnel, provide a list of all teammates who may have come in contact with the material/substance.

- 2. Active Shift Manager will maintain contact with the managers and supervisors.
- 3. Supervisors/managers will follow the direction of the emergency response personnel.

Complete ERP Incident Report

- 1. The Active Shift Manager will be responsible for completing the ERP Incident Report as soon as possible and no later than 24 hours of the end of the incident.
- 2. The ERP Incident Report and a list of affected teammates should be kept together for Emergency Response Personnel. If evacuated, indicate "ALL" teammates affected.

A. Leaking Products

Should the container of hazmat product become damaged causing a release of the product, without endangering yourself or others, do the following:

Everyone:

If imminent danger: (i.e. flammable/combustible liquid or gas)

- 1. Notify everyone in the immediate area, and then leave area immediately
- 2. Notify the nearest supervisor or manager

If no imminent danger:

- 1. Notify everyone in the immediate area
- 2. Notify the nearest supervisor or manager

Supervisor or Manager:

- 1. Without endangering yourself or others, assess the situation before entering the area.
- 2. If not familiar with the product, refer to Safety Data Sheet (SDS) for proper handling. PPE required include safety splash glasses & synthetic vinyl or nitrile gloves.

If a gas (ex. canister of propane/butane),

- 1. Notify others in the immediate area of the hazard and have teammates leave the area.
- 2. Take the leaking product out the nearest exit, while avoiding any ignition sources
- 3. Open dock doors (Pull away trailers) to ventilate area
- 4. Turn off conveyor/sorter in the immediate area
- 5. Notify supervisor/manager

If a liquid (ex. fuel, oil, some cleaners)

- 1. Turn the container in a position where the puncture/leak is facing in the most upright position
- 2. Notify others in the immediate area of the hazard
- 3. If necessary, use a plastic pail or tote to transport leaking product (Avoid ignition source if flammable).

Remember:

- 1. Avoid contact with any product (Wear appropriate gloves & eye protection) & wash hands thoroughly after incident
- 2. All damaged containers <u>must</u> be placed in containers with lids to avoid water accumulation at the outside waste storage site.
- 3. Complete ERP Incident Report

- 1. The Active Shift Manager will be responsible for completing the ERP Incident Report as soon as possible and no later than 24 hours of the end of the incident.
- 2. The ERP Incident Report and a list of affected teammates should be kept together for Emergency Response Personnel. If evacuated, indicate "ALL" teammates affected.

V. Suspicious Letter or Package

Suspicious letters or packages will typically have the following characteristics:

- Rigid or bulky
- Lopsided or uneven
- Wrapped in string
- Badly written or misspelled labels
- Generic or incorrect titles
- Excessive postage
- No postage
- Missing, nonsensical, or unknown return address
- Leaks, stains, powders or protruding materials
- · Ticking, vibration, or other sound
- Restrictive markings (i.e.: Personal or Confidential)
- Misspelled words in the address
- Badly typed or written
- Strange odor
- Excessive tape or string
- Marking not normally associated with sporting goods (ex. radioactive)

If a suspicious letter or package is suspected:

- 1. Leave the package where it was found. Do not disturb, shake, bump, smell or taste the package. Do not try to clean up the substance.
- 2. Clear the immediate area of all persons and keep others away.
- 3. Contact a supervisor or manager immediately.
- 4. Instruct people in the immediate area to wash hands and other exposed skin with soap and water.
- 5. Shut down all equipment in the immediate area including fans and HVAC systems.
- 6. Active Shift Manager will assess the situation to determine if building evacuation is necessary and/or contact emergency personnel
- 7. If building evacuation is required, follow building evacuation procedures
- 8. Upon arrival of emergency personnel, provide location of the package and a list of teammates who may have come in contact with the material/substance

- 1. The Active Shift Manager will be responsible for completing the ERP Incident Report as soon as possible and no later than 24 hours of the end of the incident.
- 2. The ERP Incident Report and a list of affected teammates should be kept together for Emergency Response Personnel. If evacuated, indicate "ALL" teammates affected.

VI. Fire

If a fire is detected or suspected:

- 1. React quickly and calmly.
- 2. If fire is small and controllable, if you are trained to use a fire extinguisher and if you don't put yourself and others at risk, use a fire extinguisher to extinguish.
- 3. Sound the fire alarm if warranted.
- 4. Call 911 if warranted.
- 5. Active Shift Manager should ensure emergency evacuation procedures are being followed.
- 6. Report any fire locations and other information to the Active Shift Manager.
- 7. Upon arrival of emergency response personnel, the Active Shift Manager shall direct them to the fire location.

Once fire has been extinguished:

- 1. Follow emergency personnel's instructions regarding building re-entry.
- 2. Do NOT enter the building until it has been determined safe by Loss Prevention.
- Clean standing water (avoiding electrical hazards).
- 4. Elevate merchandise off of floor to prevent/reduce water damage.

- 1. The Active Shift Manager will be responsible for completing the ERP Incident Report as soon as possible and no later than 24 hours of the end of the incident.
- 2. The ERP Incident Report and a list of affected teammates should be kept together for Emergency Response Personnel. If evacuated, indicate "ALL" teammates affected.

VII. Power Failure

In the case of a power failure:

- 1. Teammates are to stay calm and remain in place.
- 2. All powered equipment is to come to a complete and immediate stop and shut down.
- 3. Active Shift Manager will communicate with maintenance to determine the source and magnitude of the power outage (i.e. internal vs. external)
- 4. If needed, the Active Shift Manager will contact local power company. Ask the power company when they anticipate restoration of electrical services.
- 5. Managers and supervisors will assemble in lobby, if possible.
- 6. Utilize the emergency flashlights.
- 7. As possible, open dock doors.
- 8. Wait for instruction from the Active Shift Manager.
- 9. Active Shift Manager will determine if the building is to be closed. If the building is to be closed, follow building shutdown procedures.
- 10. Shut down any equipment that could be damaged upon power restoration.

VIII. Bomb Threat

If you receive a bomb threat over the telephone:

- 1. Remain calm and respond courteously. If possible, notify another person to listen in on the phone call.
- 2. Write down as much information as possible. Take notes on the caller's threat, tone, voice characteristics, and background noise. (see Bomb Threat checklist)
- 3. Notify the Active Shift Manager and Loss Prevention immediately.
- 4. Evacuate the building following the Evacuation Procedures.
- 5. The Active Shift Manager shall contact the police department immediately. Upon arrival, the police will be furnished with all available information.

- 1. The Active Shift Manager will be responsible for completing the ERP Incident Report as soon as possible and no later than 24 hours of the end of the incident.
- 2. The ERP Incident Report and a list of affected teammates should be kept together for Emergency Response Personnel. If evacuated, indicate "ALL" teammates affected.

IX. Weather Conditions

Definitions

- Watch Conditions are conducive to the development of severe weather
- Warning Severe thunderstorm has actually been observed by spotters, indicated on radar, or occurring

If severe weather is expected:

- 1. Loss Prevention shall monitor local weather reports
- 2. The Active Shift Manager will determine if facility shutdown and early release of teammates is necessary
- 3. Maintenance Manager shall arrange for snow and ice removal from parking lots, walkways and loading docks if needed
- 4. Active Shift Manager shall arrange for message system to announce facility closure and arrange for local media to announce the facility closure

Tornado Procedures:

- 1. In the event of a tornado warning in the area, you will be directed to the tornado shelter areas as identified by signage. (see Appendix)
- 2. Make an effort to take flashlights and fire extinguishers to the shelter.
- 3. Once in the shelter, crouch down and cover your head.
- 4. Once the danger passes an announcement will be made to exit the shelters. If you notice any damage to the building, notify a supervisor immediately.
- 5. If the building can no longer be occupied an announcement will be made and you are to follow the evacuation procedures
- 6. If there are injuries, notify a first responder

- 1. The Active Shift Manager will be responsible for completing the ERP Incident Report as soon as possible and no later than 24 hours of the end of the incident.
- 2. The ERP Incident Report and a list of affected teammates should be kept together for Emergency Response Personnel. If evacuated, indicate "ALL" teammates affected.

X. Water Contamination

If local water authority has declared a non-hazardous "contaminated water" condition:

- 1. Maintenance shall shut off all water including coffee machines, water fountains, water to restrooms, and locker room showers.
- 2. Do not shut off sprinklers.

Once water is declared safe:

- 1. Maintenance shall follow the directions issued by the city to flush out any other equipment including flushing out all water lines.
- 2. Maintenance and janitorial staff shall clean and sanitize coffee machines, water fountains, faucets and showers and replace all necessary filters.

If local water authority has declared a hazardous "contaminated water" condition:

1. Active Shift Manager shall order the evacuation of the building.

- 1. The Active Shift Manager will be responsible for completing the ERP Incident Report as soon as possible and no later than 24 hours of the end of the incident.
- 2. The ERP Incident Report and a list of affected teammates should be kept together for Emergency Response Personnel. If evacuated, indicate "ALL" teammates affected.

XI. Flood

If there is the threat of a flood:

- 1. A Loss Prevention teammate should monitor local weather alerts and track progression of potential flooding.
- 2. Active Shift Manager shall notify all managers.
- Active Shift Manager shall contact local emergency personnel (fire department and/or police).
- 4. As possible, elevate floor merchandise using the rack locations when possible.
- 5. As possible, turn off electric power at the main switch and all other utilities.
- 6. Transportation shall ensure DC shipments are re-routed and arrange for removal of trailers with merchandise from the yard as possible.
- 7. Active Shift Manager will determine if facility shutdown and early release of teammates is necessary.

Post Flood Procedures:

- 1. Loss Prevention Supervisor (with assistance of the Active Shift Manager) will establish control of building and security immediately. Establish guard service, if necessary.
- Managers, Supervisors and Loss Prevention shall inspect the building to assess damage. Teammates shall not be permitted to re-enter building until it has been deemed safe.
- 3. Maintenance and local utility company should check the electrical service prior to restoring power to the building.
- 4. Enter building with caution. Wear appropriate protective clothing. Snakes and other animals may have entered the building.

- 1. The Active Shift Manager will be responsible for completing the ERP Incident Report as soon as possible and no later than 24 hours of the end of the incident.
- 2. The ERP Incident Report and a list of affected teammates should be kept together for Emergency Response Personnel. If evacuated, indicate "ALL" teammates affected.

XII. Earthquake

In the Event of an Earthquake:

- 1. If indoors, remain indoors.
- 2. Take shelter under a sturdy desk, table, or bench or against an inside wall. If there is not a table or desk nearby, crouch in an inside corner of the building.
- Cover your face and head with your arms.
- 4. Stay away from storage racks, overhead conveyor, glass, windows, outside doors and walls, and anything that could fall.
- 5. Do not rush outside.
- 6. Do not panic if the fire alarm and sprinklers go off.

After an Earthquake:

- 1. Expect aftershocks.
- 2. Evacuate the building per the evacuation procedures.
- 3. Active Shift Manager will determine if facility shutdown and early release of teammates is necessary.
- 4. Listen for the latest emergency information via a battery-operated radio or television.
- 5. Maintenance will turn off gas, water and electricity to the facility as possible and if needed.
- 6. Managers, supervisors and loss prevention will inspect designated areas of the building to access damage as possible.

- 1. The Active Shift Manager will be responsible for completing the ERP Incident Report as soon as possible and no later than 24 hours of the end of the incident.
- 2. The ERP Incident Report and a list of affected teammates should be kept together for Emergency Response Personnel. If evacuated, indicate "ALL" teammates affected.

XIII. Suspicious / Hostile Persons

If a suspicious/unauthorized person is suspected:

- 1. If you feel comfortable, approach the person and ask questions to determine the reason for their presence.
- 2. If you are not comfortable approaching the person, call your supervisor or manager
- 3. If you feel threatened in anyway, call 911 immediately
- 4. Direct visitors/guests to the lobby desk. All visitors/guests are required to sign in at the receptionist area and wear a visitor badge.
- 5. Secure purses, wallets, ID, and anything of value. Never leave any sensitive information out in common view.

If confronted by an angry or hostile person:

- 1. Stay calm; listen attentively
- 2. Maintain eye contact
- 3. Be courteous and patient
- 4. Don't risk harm to yourself or others
- 5. Signal a co-worker if you need help
- 6. Have someone call 911 if warranted

XIV. Active Shooter

Profile of an Active Shooter

An Active Shooter is an individual actively engaged in killing or attempting to kill people in a confined and populated area, typically through the use of firearms.

Characteristics of an Active Shooter Situation

- Victims are selected at random.
- The event is unpredictable and evolves guickly.
- Law enforcement is usually required to end an active shooter situation.

Coping with an Active Shooter Situation

- Be aware of your environment and any possible danger.
- Take note of the two nearest exits in your facility.
- If you are in the office, stay there and secure the door.

How to respond – (Run Hide Fight)

- 1. Run When an active shooter is in your vicinity
 - Have an escape route plan in mind
 - Evacuate whether others agree to or not
 - · Leave your belongings behind
 - Help others escape if possible
 - Prevent others from entering the area
 - Call 911 when you are able
- 2. Hide If an evacuation is not possible, find a place to hide
 - Lock and or blockade the door
 - Silence your cell phone
 - Hide behind large objects in an area out of the shooter's view
 - Remain very quit
 - Provide protection if shots are fired in your direction
 - Don't trap or restrict your options for movement
- 3. **Fight** As a last resort, and only if your life is in danger
 - Attempt to incapacitate the shooter
 - Act with physical aggression
 - Improvise weapons
 - Commit to your actions
- 4. When law enforcement arrives
 - Remain calm and follow instructions
 - Keep your hands visible at all times
 - Avoid pointing or yelling
 - Know that help for the injured is on the way
 - Avoid quick movements toward officers such as holding on to them for safety
- 5. Information to provide to law enforcement or 911 operator
 - Location of the active shooter and number of active shooters
 - Physical description of shooters
 - Number and type of weapons held by shooters
 - Number of potential victims at the location



EMERGENCY RESPONSE PLAN

Appendix

- (A) ERP Incident Report
- (B) ERP Bomb Threat Checklist Telephone Procedures
- (C) ERP Assembly Area and Tornado Shelter Area
- (D) ERP Critical Phone Numbers



Appendix A

Dick's Sporting Goods Distribution Center

EMERGENCY RESPONSE PLAN

ERP Incident Report

Complete this report for every emergency that occurs at the Distribution Center.

Attach additional sheets, if necessary.

Specific Location of Incident:	
Date Incident Occurred:	
Time Incident Occurred:	
Incident Description	
,	
,	
Emergency Response Personnel called:	
When:	
By Whom:	
Incident Commander Called:	
moderit Commander Called.	
Is building evacuation necessary?	☐YES or ☐NO
· ·	
Describe steps taken:	
	*
List teammates involved (if all teammates a	ffected, write "ALL."



Appendix B

EMERGENCY RESPONSE PLAN

Bomb Threat Checklist Telephone Procedures

Instructions

- Be calm and courteous.
- Listen and do not interrupt the caller.
- Notify Loss Prevention or other member of Management immediately.
- Initiate steps of the bomb threat emergency procedure.

Other Suggestions

- Pretend difficulty in hearing
- Keep the caller talking

If caller seems agreeable to further conversation ask:

- Location of device
- Type of device
- When will it detonate
- Caller's location
- Caller's name and address

Name of Teammate receiving	g call:		
Date (mm/dd/yyyy):			ŧ
Time (indicate AM or PM):			
	<u> </u>		
Caller's Identity			
Sex:			
Age:			ii .
Adult:			
Juvenile:			
	V I		
Voice Characteristics (Speed	ch)		
Loud	Deep	Fast	Disturbed
Soft	Pleasant	Slow	Nasal
Raspy	Stuttered	i Lisp	Slurred
High Pitched	Other:		
		6	
Language			
Excellent Good	Fair Poor Fo	oul	





EMERGENCY RESPONSE PLAN

Bomb Threat Checklist Telephone Procedures

Accent Other:
Manner
☐ Calm ☐ Angry ☐ Righteous ☐ Emotional ☐ Rational ☐ Coherent ☐ Incoherent ☐ Deliberate ☐ Laughing ☐ Other:
Background Noises
☐ Factory machines ☐ Trains ☐ Street Traffic ☐ Airplanes ☐ Party Atmosphere ☐ Quiet ☐ Voices ☐ Office Machines ☐ Animals ☐ Music Type: ☐ Other:
Write out messages and threats that are received and any other comments pertinent to the situations.