



**MONTGOMERY WATSON**  
Mining Group



RED G/00

January 7, 2000

(Via: FedEx)

New Mexico Environmental Department (NMED)  
Hazardous and Radioactive Materials Bureau  
2044 Galisteo  
P.O. Box 26110  
Sante Fe, New Mexico 87502

Attn: Ms. Stephanie Kruse

Re: Revised Draft of Sections 5, 6, 7, 9 and 10  
Triassic Park Waste Disposal Facility - Part B Permit Application  
Gandy Marley Inc. (GMI)

Dear Ms. Kruse:

Attached is a hard copy of revised Sections 5, 6, 7, 9 and 10. These sections address comments we received from NMED after we incorporated our responses to the RSI request. We understand that after you have reviewed these sections, we will submit electronic copies that will be incorporated into your permit modules.

If you have any questions or require any additional information, please contact the undersigned or Mr. Dale Gandy.

Sincerely,

Montgomery Watson

Patrick Corser, P.E.  
Principal

cc: Dale Gandy - GMI  
Trey Greenwood - Delhart  
Ken Schultz - GMI (w/o attachments)

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1/6/2000 slw

## 5.0 PROCEDURES TO PREVENT HAZARDS

This section provides information on the prevention of hazards to both the public and the environment. Specific procedures for implementing those safeguards will be developed during the construction phase of the project and prior to Facility operations.

The engineered barriers for the mitigation of hazards discussed in this section are shown in design drawings contained in Volume III.

### 5.1 SECURITY PROCEDURES TO PREVENT HAZARDS

Security at the Facility will be provided by security guards, fences surrounding the Facility and warning signs. Each of these is described in the following sections.

#### 5.1.1 Barrier and Means to Control Entrance

The Facility will be bounded by a barbed-wire fence. The active portion of the Facility (i.e. the processing area) will be bounded by an additional fence with two access gates located in the northern portion of the Facility. The northwest gate will remain locked at all times and will serve as a secondary or emergency entrance/exit. Access into the Facility will be controlled by means of the primary gate, located in the northeast corner of the Facility. The gate will be fitted with a cattle guard to prevent livestock from entering the Facility. A security guard post will be located at this entrance gate and will be attended 24 hours a day. The fence, gates, and guard will provide adequate access control and will prevent unwitting entry of persons or livestock to the active portion of the Facility.

Visitors will be required to sign a visitors log prior to movement in or around the Facility. Each visitor will be issued a security badge, which will be worn while the visitor is onsite. The badge will be worn on the visitor's outermost garment in a clearly visible location above the waist. The security guard will be responsible for ensuring that all visitors comply with these requirements. Visitors will be escorted unless other arrangements are made with Facility personnel.

#### 5.1.2 Warning Signs

Warning signs stating "Danger - Unauthorized Personnel Keep Out" will be posted at the site entrance and every 50 feet along the perimeter fence. The signs will be posted in English and Spanish and will be legible from a distance of at least 25 feet. If ignitable wastes are stored or treated in the area, a "No Smoking" sign will also be posted.

### 5.2 INSPECTION PROCEDURES

This section of the permit application provides written inspection guidelines and an inspection schedule for the Facility in accordance with 20 NMAC 4.1.

#### 5.2.1 General Inspection Procedures

Facility personnel will conduct inspections of all equipment and structures as frequently as necessary to prevent, detect, or respond to environmental or human health hazards. Inspection records describing malfunctions, deteriorations, operator errors, and discharges that may cause or contribute to a release of hazardous waste constituents to the environment or that may be a threat to human

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*This submittal supersedes all previous information.*

health will be kept at the Facility administration building for three years from the date of the inspection. Specific inspection procedures are outlined in Sections 5.2.2 through 5.2.9.

Personnel will receive general training about hazardous waste inspections as part of the Facility hazardous waste training program. Personnel responsible for inspecting particular equipment or areas of the Facility will receive classroom and/or on-the-job training in inspection procedures. Inspection procedures will be described in the operating manual, which will be located in the EC's office.

Facility guards will make rounds of the Facility at least once daily to detect any unauthorized entry to the Facility or any other abnormalities. The guards will not use inspection checklists, but they will notify the Emergency Coordinator (EC) and/or emergency response personnel of any spills or other emergencies. Requirements for the EC and/or emergency response personnel, subsequent to an inspection notification, are outlined in the Contingency Plan in Section 6.0.

#### **5.2.1.1 Inspection Checklist**

Inspection checklists and an inspection schedule have been developed to ensure that inspections occur at appropriate frequencies. An inspection schedule matrix is provided in Table 5-1. This matrix will be expanded, as necessary, to reflect new equipment or changes to existing equipment inspection frequencies.

Inspection frequencies will vary according to the type and age of the equipment, the frequency of its use, and its importance in preventing environmental incidents. The inspection frequencies provided in Table 5-1 show that inspections will occur frequently so that problems can be identified in time to correct them before harm is done to human health or the environment.

The inspection checklists will identify the name of the inspector, date and time of the inspection, frequency of inspection, specific items to be checked, any notations or observations of abnormalities, and the nature and date of any corrective actions taken. Checklists are provided in Appendix I, Volume II. The inspection schedules will be kept in the EC's office.

When new or modified equipment is installed or used at the Facility, the inspection procedures, forms, and schedule will be revised to reflect these changes and submitted to NMED.

#### **5.2.1.2 Remedial Action**

Facility personnel or contract personnel will remedy any deterioration or malfunction of equipment or structures encountered during inspections. The remedy will be completed in sufficient time to ensure that the problem does not result in an environmental or human health hazard.

All repairs to permitted portions of the Facility will be made in accordance with the original construction specifications and Construction Quality Assurance (CQA) plan.

If a hazardous or potentially hazardous condition is identified, the EC, as specified in the Contingency Plan (Section 6.0), will be notified immediately to assess the situation and determine how to correct the situation and whether the Contingency Plan should be implemented.

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### 5.2.2 Landfill Inspection Procedures

Landfill liners and the cover will be inspected during and immediately after installation in accordance with the CQA Plan, which is discussed in Section 2.5.2.3.

The landfill and associated equipment will be inspected weekly and after storms unless otherwise specified. Records of the inspections will be maintained in the operating record, which will be kept in the administration building.

If deterioration or any other abnormalities are noted during inspection of the landfill or associated components, the inspector's supervisor will be notified and will determine the appropriate course of action for correction. If the supervisor is not available, the EC will be summoned to make the determination.

The landfill will be inspected by properly-trained personnel weekly and after storms for such items as spills, leaks, odors, wind-blown particulate matter, any evidence of deterioration of the landfill itself, and any malfunction or improper operation of the run-on/run-off control systems. All inspections will be documented on the landfill inspection checklist, described in Section 5.2.1.1 and found in Appendix I (Volume II) of the application. Inspection checklists will be kept for at least 3 years, in accordance with 40 CFR 264.15(d).

During the active life and during closure of the landfill, the LCRS and LDRS will be checked daily for the presence of liquid. The amount of water in the system can be used to determine if the system is functioning properly. The system will either be inspected through the cleanout pipe, which is connected to the primary collection pipe and the sump riser pipe, or with magnehelic gages or other liquid detection devices, if they are installed. The leachate collection tank will be inspected in accordance with the procedures outlined in Section 5.2.5.

During the operational phase of the landfill, periodic checks will be made within the landfill to detect the presence of hazardous gases and volatile organics. Surveys of the active landfill surface area and the riser pipes with an Organic Vapor Meter (OVM) or comparable device will be performed quarterly to detect the presence of organic compounds.

If it is evident that particulate matter from the landfill is subject to dispersal by the wind, the active portion of the landfill will either be covered or managed to control the dispersal (see Section 2.5.1.7). Adding water to prevent wind erosion will be limited so that ponding in the landfill does not occur. If the dispersion is noted during an inspection, the landfill supervisor will notify the sprayer truck operator to rectify the situation.

The stormwater collection and holding unit associated with the run-off/run-on control systems will be inspected to ensure that liquid has not accidentally accumulated. The collection system will be emptied as quickly as possible to ensure that the design capacity of the system is not exceeded.

### 5.2.3 Evaporation Pond Inspection Procedures

Evaporation pond liners will be inspected during and immediately after construction and installation in accordance with the CQA Plan, which is discussed in Section 2.5.2.3.

While the evaporation pond is in operation, it will be inspected daily to detect any sudden drops in the level of the pond's contents and to measure the volume of and remove any liquid that has accumulated in the leachate collection and leak detection sumps. The daily inspections will also serve

to ensure that there is no potential for overtopping by wind or wave action. Since all discharges into the pond will be monitored, visual inspections will be adequate.

Other inspection items, such as condition of berms, warning signs, and surrounding area, will be checked weekly and after storms. Weekly visual inspections will also be conducted to verify the integrity of the liners and associated systems. Visible portions of the leachate collection pipes and pump will be visually inspected weekly for deterioration. The concrete pad for tanker discharge will be visually inspected weekly for accumulation of liquids. The area around the pond will be inspected weekly for any signs of deterioration, leaks, erosion, etc. The evaporation pond berms will be inspected for any sign of abnormal deterioration, which may include excessive sloughing or the development of significant cracks. All of the above inspections will be used to assess the integrity of the surface impoundments.

An inspection checklist for the evaporation pond is provided in Appendix I, Volume II.

#### **5.2.4 Container Storage Area Inspection Procedures**

Weekly visual inspections of container storage areas (drum storage area and roll off storage area) will be performed to identify the status of warning signs, condition of containers and labels, availability and accessibility of spill control and PPE, and the adequacy of aisle space and access/egress routes. Containers will be inspected for any signs of excessive corrosion, buckles, dents, holes, other structural defects or deterioration, and over-pressurization. An inspection checklist for container areas is provided in Appendix I in Volume II.

If a container is found to be in poor condition, the inspector's supervisor will be notified, who will either arrange to transfer the hazardous waste to a new container, repair the existing container as specified by the manufacturer, or place the container in an overpack drum.

Containers used for storing liquids will be stored in a secondary containment area described in Section 2.2. These areas will be inspected weekly during the container storage area inspections. The inspections will focus on (1) the condition of sump pits and trenches to ensure that they are free of cracks or gaps and are sufficiently impervious to contain leaks, spills, and accumulated liquids until the collected material is detected and removed; (2) pump operation; and, (3) placement of containers to ensure that designed liquid flow paths are not obstructed. A record of the inspection will be maintained in the operating record, which will be kept in the administration building.

#### **5.2.5 Tank Inspection Procedures**

Tanks containing or treating waste will be inspected daily. Tanks containing waste include the liquid waste storage tanks and the leachate storage tanks for the landfill. These inspections will focus on the status of warning signs, the adequacy and availability of spill control and PPE, the adequacy of access routes, and the condition of the tanks, ancillary equipment, and monitoring and leak detection systems. The inspection will focus on (1) overfill control; (2) equipment condition to detect any signs of corrosion or releases of waste from the tanks or ancillary equipment; (3) data gathered from monitoring and leak detection equipment to ensure that the tank system is being operated in accordance with design specifications; and, (4) the Cathodic Protection Systems, if installed.

Secondary containment areas in which tanks are located will be inspected daily during the tank inspections. These inspections will focus on the condition of the containment surface to ensure that it is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, or accumulated liquids until the collected material is detected and removed. Inspection records will be maintained in

the Facility operating record, which will be kept in the administration building. An inspection checklist for tanks is provided in Appendix I in Volume II.

### **5.2.6 Stabilization Unit Inspection Procedures**

Inspection of the stabilization unit will be conducted according to the procedures specified in Section 5.2.5. The inspections will be conducted on days when the unit is operating and daily when waste is in storage. Additional inspection requirements are described in Section 2.4.6. Inspection records will be maintained in the administration building.

### **5.2.7 Security Equipment Inspection Procedures**

Security inspections will be conducted regularly and will include the following elements:

- visual inspection of the warning signs at all approaches to the Facility to ensure that the signs are present, legible, and securely attached to the fence;
- inspection of the Facility perimeter to ensure the integrity of the fence and gate by looking for signs of erosion of soil at the fence posts and corrosion or vandalism to the fence, fence posts, or locks;
- inspection and replacement, as necessary, of lights for the purpose of illuminating the Facility at night;
- inspection of structures for signs of erosion, tampering, or vandalism; and,
- records of inspections will be maintained in the administration building.

### **5.2.8 Safety and Emergency Response Equipment Inspection Procedures**

Safety and emergency response equipment inspections will occur monthly. This category of equipment includes first aid supplies; respiratory protection equipment (other than personally issued respirators, which will be each employee's responsibility); protective clothing, including hard hats, gloves, and suits; fire extinguishers; eye wash stations; safety showers; empty 55-gallon drums; shovels; and spill cleanup and decontamination kits.

A monthly inventory of safety-related supplies and equipment will be performed to ensure that the items are available, in good condition, and at designated locations. Inadequate or missing items will be replaced or repaired.

Fire protection equipment, including fire extinguishers and fire hoses, will be inspected monthly and after each use to ensure that the equipment is capable of functioning properly and that access to the equipment is not blocked. Each fire extinguisher will be inspected to ensure that the seal around the handle is intact, that the pressure gauge indicates that the unit is adequately charged, and that an Underwriter's Laboratory listing label is attached to each unit. Building sprinkler systems will be inspected according to manufacturer specifications. Chemical fire-suppression systems will be checked to ensure that adequate quantities of the chemical and water exist. The fire-suppression vehicles will also be tuned up at least annually and inspected monthly. Records of inspections will be maintained in the administration building for each unit.

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The public address (PA) system will be tested daily to ensure proper operation. In lieu of daily testing, the Facility may opt to broadcast music 24 hours a day, which ensures proper operation of the unit at all times.

Hand-held radios will be tested prior to use each day and periodically throughout the day. The units will be recharged after each shift to ensure that they are operating properly.

### **5.2.9 Loading and Unloading Area Inspection Procedures**

Waste loading and unloading areas will be inspected daily when in use. The inspections will focus on integrity of the containment structure and safety-related issues that could lead to hazards or waste spills. Signs will be located at each loading and unloading area indicating that equipment or materials should not be left unattended as they could be obstructions for the loading and unloading operation.

Onsite roadways and vehicle traffic areas will be inspected on a preventive maintenance order (PMO) schedule to ensure that potential safety hazards, such as road surface deterioration, are minimized or avoided. Records of inspections will be maintained in the administration building for each unit.

### **5.2.10 Truck Wash Area Inspection Procedures**

The sump and sediment bins will be inspected weekly for the accumulation of sediment and liquids in the sump and will be removed to the wash water storage tank.

## **5.3 PREPAREDNESS AND PREVENTION PROCEDURES**

Preparedness and prevention encompass a wide range of procedures, from communication to equipment to arrangements with local authorities. These procedures are discussed in the following sections.

### **5.3.1 Internal Communications**

Internal communication will be established to meet the needs for each building and area at the Facility. Three forms of internal communication systems will be implemented; (1) a PA system will be used in the main buildings to alert employees of potential or actual emergencies; (2) in noisy, temporary buildings or remote areas of the Facility, hand-held two-way radios will be used to communicate emergencies; (3) an audible fire alarm will be located in the permanent buildings. The alarm will be used to alert employees of fires but may also be used for alerting them to other emergencies in the event that the two other systems described above are malfunctioning. Equipment tests will be conducted to assure that internal communication systems are functioning properly according to manufacturers specifications.

### **5.3.2 External Communications**

A telephone will be available for operations that occur inside the main buildings. For outdoor processing areas without a telephone nearby, hand-held two-way radios capable of summoning emergency assistance from local police departments, fire departments, and state or local emergency response teams will be available.

A map identifying the location of telephones at the Facility will be provided to the NMED prior to acceptance of waste at the Facility.

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### **5.3.3 Emergency Equipment**

Emergency response equipment at the Facility includes fire extinguishers and other fire control equipment, spill cleanup kits, and decontamination kits. Each processing area regulated storage unit will be equipped with fire control and spill response equipment. Equipment in the stabilization unit will be used for the tank storage area and roll-off storage area because of their close proximity. A detailed description of this equipment, including the content and type, is included in Appendix M in Volume II and is discussed in the Contingency Plan contained in Section 6.0.

A complete list of the contents and location of the various types of kits will be maintained in the EC's office at the Facility.

### **5.3.4 Water for Fire Control**

Permanent buildings at the Facility will be equipped with automatic sprinkler systems and fire extinguishers, as required by the National Fire Protection Association (NFPA) code. The sprinkler systems will be designed according to NFPA guidelines. Water to fight fires outside of buildings and the landfill will be available in water truck(s). It is expected that landfill fires, in the unlikely event that they occur, will be extinguished with a dirt cover. A ready supply of dirt will be available at the excavation stockpile and landfill and general facility equipment (dozers, loaders and scrapers) will be available to load, haul and place dirt.

### **5.3.5 Required Aisle Space**

The aisle between double rows of containers in the drum handling unit will be 30 inches wide, and roll-off containers will be placed 4 feet apart and 4 feet from the edge of the berm. Such spacing will allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in the event of an emergency. Drums will only be staked one high.

### **5.3.6 Arrangements with Local Authorities**

The Facility will make arrangements with local authorities as described in the Contingency Plan (see Section 6.0).

## **5.4 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT**

To prevent accidents at the Facility, all individuals responsible for material and waste handling will receive classroom and on-the-job instruction in safety awareness, recognition of potential hazards in the work place, environmental procedures and policies, and fire prevention and control procedures. Individuals who may come in contact with hazardous waste will receive Occupational Safety and Health Administration (OSHA) 40-hour training. These individuals also will be trained in the operation of the equipment and vehicles they will be using to perform their duties.

Safety meetings will be conducted as necessary to discuss safety issues, fire prevention and control, good housekeeping and any problems relating to specific areas of the site.

### **5.4.1 Loading, Unloading, and Waste Transfer Operations**

To prevent accidents during loading, unloading, and waste transfer, hazardous waste will be handled only by those individuals who have been properly trained in correct handling procedures and proper

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spill response procedures. The emergency brakes of transport vehicles will be engaged and the wheels chocked during all loading and unloading operations. Inspection of loading and unloading areas is discussed in Section 5.2.9.

Waste containers will always remain closed during storage, except when it is necessary to add or remove waste (e.g. for sampling). This practice will minimize the potential for accidental releases of waste. Waste containers will only be staked one high which will facilitate inspection, handling and storage.

Wastes will be transferred in approved vehicles over approved routes and the maximum capacity of the truck will not be exceeded. Ramps will be installed where necessary to enable fork lifts, dollies, or hand trucks to move into or out of secondary containment areas surrounded by berms or curbing.

Transferring waste from drums to tanks will be accomplished as expeditiously as possible to avoid having containers remain open for extended periods of time.

If ignitable wastes are handled, special precautions will be instituted, including the use of special non-sparking bung wrenches or other tools for opening drums or otherwise handling the waste containers, grounding waste containers during waste transfer, and other special handling requirements. These precautions, coupled with the procedures for management of ignitable waste contained in Section 2.0, will minimize the hazards associated with ignitable wastes.

#### **5.4.2 Run-Off and Run-On**

Run-off and run-on for the major units are described in the following sections.

##### **5.4.2.1 Tank Storage, Container Storage, and Treatment Areas**

Run-off and run-on will be prevented in container and tank storage areas and the stabilization unit through exterior drainage systems located at the perimeters of these areas, outside of the containment systems. The layout of the perimeter drainage ditches is shown on Drawing 25.

All containment areas associated with tanks or containers will be sloped to remove accumulated liquids caused by spills, leaks, or precipitation (for outdoor units). Liquids that accumulate in any secondary containment area will be sampled to determine if the liquid is hazardous waste. If the liquid is hazardous, the waste will be pumped to a drum or tank and handled accordingly. If the liquid is not contaminated, it will be discharged to the storm drainage system.

Inspection of the run-off and run on ditches for the above facilities will be made during daily and weekly site inspections.

##### **5.4.2.2 The Landfill and Evaporation Pond**

The landfill run-on control system will be capable of preventing flow onto the active portion of the landfill during peak discharge from at least a 24-hour, 25-year storm. The run-on control system will consist of unlined ditches for diverting run-on from off site around the landfill. Water from outside the landfill will be prevented from entering the active portion of the landfill by the waste processing corridor drainage ditch.

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*This submittal supersedes all previous information.*

The run-off management system will be capable of collecting the water volume resulting from at least a 24-hour, 25-year storm. Run-off in the active portion of the landfill will be collected in the LCRS. The run-on and run-off control system for the landfill is described in greater detail in Section 2.5.1.6.

The area surrounding the evaporation pond will be graded to carry stormwater run-off towards the drainage ditch to the south of the evaporation pond area. This ditch will ultimately empty into the site stormwater detention pond. The perimeter of the evaporation pond is elevated to prevent stormwater run-on into the pond from surrounding areas.

Inspection of the run-off and run-on ditches for the landfill and evaporation pond will be made during daily and weekly site inspections.

### 5.4.3 Wind Dispersal Control System

The active portion of the landfill will either be covered or managed to control the wind dispersal. In general, dust control will be accomplished by spraying water on the active portion of the landfill and any road or area subject to wind dispersal. Adding water to prevent wind erosion will be limited so that ponding in the landfill does not occur. Additional detail about wind dispersal procedures can be found in Section 2.5.1.7.

### 5.4.4 Water Supply Protection

The Facility will coordinate intended water use with the State Engineer's Office, Water Rights Division, and other appropriate agencies. The domestic water supply (via underground water line from a spring in the Ogallala formation located approximately one mile east of the Facility) will be protected by the following: (1) natural means because of its location; (2) the design of the landfill; (3) the type of waste that will be accepted at the Facility; and (4) the method of response to releases to soil. Each is discussed in more detail below.

Natural geologic and hydrologic conditions in the area include the following characteristics.

- the Upper Dockum unit is unsaturated beneath the selected site;
- the Lower Dockum consists of a 600-foot thickness of homogeneous, lacustrine mudstone. This sequence of unsaturated, low permeability mudstones represents a geologic barrier to potential downward migration of contaminants from the landfill (see Section 3.0); and,
- the nearest surface water is the Pecos River, approximately 30 miles to the west of the Facility.

The landfill design includes removal of the 10-foot deep layer of alluvial material on the surface of the disposal site prior to construction of the cells, thus eliminating the possibility of hazardous constituents entering the alluvium and migrating away from the Facility.

Free liquid hazardous waste will be placed in the landfill only in accordance with 40 CFR 264.314(d). In addition, no non-hazardous liquid waste will be placed in the landfill. These limitations on the introduction of liquids into the landfill will minimize the generation of leachates and the potential for the migration of any hazardous constituents from the Facility.

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Finally, any releases to the soil will be immediately cleaned up to prevent the spread of contamination. The Contingency Plan in Section 6.0 describes the equipment and personnel available to ensure prompt clean up of any spill.

#### **5.4.5 Mitigation of Effects of Equipment Failure and Power Outages**

The Facility will use a Preventive Maintenance Order (PMO) schedule, based on manufacturer's recommendations for various pieces of equipment, to ensure proper operation of the equipment. In addition to the items replaced or changed as part of the PMO schedule, any item(s) found to be deficient during the PMO inspection will be replaced or repaired as soon as possible.

Spare parts critical to ensuring continuation of equipment and safety systems may be stored onsite to facilitate immediate repairs. Other items that require long ordering periods also may be stored onsite.

In the event of a power failure, at least one backup generator will be used for emergency backup power. The generator will be started within 30 minutes of a power failure.

On-the-job training will provide personnel with appropriate instruction in emergency response procedures so that proper actions will be taken in the event of equipment or power failure.

The emergency power system is described in Section 6.3.5.4 of the Contingency Plan.

#### **5.4.6 Prevention of Undue Exposure of Personnel to Hazardous Waste**

All employees will be trained in the safe operating practices to be used in handling hazardous wastes. All employees will wear steel-toed shoes and safety glasses while in processing or active areas of the landfill. In some cases, additional Personal Protective Equipment (PPE) will be required, such as hearing protection, respiratory protection, and protective clothing. Employees will be trained in, and responsible for, proper inspection and use of their respirator and proper use and care of PPE. If a defect is noted in any of the equipment, the employee will be responsible for replacing or repairing it prior to use, in accordance with the applicable training. As previously stated, PPE, other than respiratory protection, will be located at or near each permitted unit, along with spill response equipment.

Routine tasks will require some PPE, as outlined in the site Health and Safety (HAS) Plan. In many cases, these requirements will include safety glasses, steel-toed shoes, and hard hats. The site HAS plan will be prepared prior to commencement of hazardous waste operations. This plan will be kept at the Facility, but is not considered part of this permit application.

Out-of-the-ordinary hazardous waste activities will be evaluated by the site HAS officer or a member of an emergency response team prior to responding to the incident. After the type of contaminants present has been determined, the HAS officer or the EC will specify the respiratory protection and/or PPE requirements necessary to safely handle the incident. All respiratory protection devices will be maintained in compliance with OSHA requirements and will be issued only to qualified personnel who have received medical approval and training for the proper use of respiratory protection devices.

For emergencies that are beyond the scope of the Facility personnel training program, areas of the Facility or the entire Facility may be evacuated, at the direction of the EC. In such cases,

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professional emergency response personnel will be notified to respond to the emergency (see Section 6.0).

#### **5.4.7 Special Requirements for Bulk and Containerized Liquids Disposed in Landfills**

As previously stated, bulk or non-containerized liquids will not be disposed in the landfill. Containers holding free liquids will be placed in the landfill only if (1) all free-standing liquid has been removed by decanting or other methods, mixed with non-biodegradable sorbent, solidified so that free-standing liquid is no longer observed, or otherwise eliminated; (2) the container is very small; (3) the container is designed to hold free liquids for use other than storage (e.g., a battery); or (4) the container is a lab pack disposed in accordance with 40 CFR 264.316.

In the case of number (1) above, prior to placement in the landfill, the absence of free liquids will be verified using a paint filter test. In addition, this waste will be analyzed for other parameters based upon the characterization of the waste before solidification. These requirements are a part of the Waste Analysis Plan presented in Section 4.0.

#### **5.4.8 Special Requirements to Limit Releases to the Atmosphere**

Operations at the Facility will be conducted to minimize the potential for releases to the atmosphere as required by 40 CFR 270.14(b)(8)(vi). This objective will be achieved by using a wind dispersal control system to limit or eliminate the dispersal of particulate matter from the landfill, roadways, and other areas of the Facility and by providing control equipment for operations that may produce air emission, if necessary. The dispersal of particulate matter from soil surfaces will be reduced by restricting traffic and applying small amounts of water spray to moisten the soil surface. A structural containment building housing the stabilization unit will be equipped with pollution control systems to minimize the release of particulates to the atmosphere. The bins and stabilization building will be equipped with an exhausting ventilation system which will maintain a negative pressure inside the building. Slotted ducts located around the perimeter of each bin will provide supply and return air in a push-pull arrangement to remove dust during the waste receiving, mixing and load-out operations. During reagent delivery operations, the bin cover, which will also be connected to the exhaust system, will control dust. Dust will be removed from the exhaust air at the bag house located on the west side of the building. Collected dust will be processed in the stabilization unit. Procedures will be developed to ensure that the landfill and associated activities are managed to prevent particulate releases. The Contingency Plan will specify the methods to prevent and control spills and emissions related to spills.

### **5.5 PRECAUTIONS TO PREVENT IGNITION OR REACTION OF IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES**

Hazardous wastes will be handled only by properly trained Facility personnel. The Facility training program is outlined in Section 7.0. Individuals will be instructed in identifying incompatible wastes, properly labeling them, and properly handling them. Proper handling includes segregation, avoidance of mixing the wastes, and carefully checking compatibility codes prior to the storage or disposal of any wastes. Personnel also will be specifically trained in the proper handling of ignitable and reactive wastes.

This approach will ensure the proper handling of ignitable and reactive waste and will prevent mixing of incompatible waste. In addition, personnel training and Facility operational procedures will be developed to (1) ensure that wastes are properly identified; (2) ensure that general Facility requirements for the management of ignitable, reactive, and incompatible wastes are adequate; and

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*This submittal supersedes all previous information.*

(3) ensure that unit-specific requirements for the management of these wastes are compatible with operations. The procedures for identifying these wastes are provided in Section 4.3.

The local fire department or a qualified organization will inspect all of the permitted units on an annual basis to assure continued compliance with all applicable NFPA codes.

Ignitable and reactive waste handling are generally described in Section 5.5.1. More specific requirements for the landfill and stabilization unit are described in Section 5.5.2. Handling of incompatible waste is described in Section 5.5.3.

### **5.5.1 General Requirements**

Precautions will be taken to avoid (1) accidental ignition or reaction of ignitable or reactive wastes; (2) reactions that generate extreme heat or pressure, fire or explosions, or violent reactions; (3) reactions that produce uncontrolled toxic or flammable fumes, dusts or gases, in quantities large enough to threaten human health and the environment; (4) reactions that cause damage to the structural integrity of the container or the unit; and (5) any other reactions that threaten human health or the environment.

Ignitable or reactive wastes accepted at the Facility will be separated and protected from any sources of ignition or reaction, including open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks, spontaneous ignition, and radiant heat. All smoking will be confined to specifically designated areas when ignitable or reactive wastes are being handled. "No Smoking" signs will be conspicuously posted wherever there is a hazard from ignitable or reactive waste. Ignitable or reactive wastes will be located in the active portion of the Facility, which is more than 50 feet from the Facility property line.

### **5.5.2 Requirements for the Landfill**

Ignitable or reactive wastes will not be placed in the landfill unless the waste has been treated and no longer meets the definition of ignitable or reactive waste under 40 CFR 261.2 or 261.23, or unless the general requirements outlined above for ignitable, reactive, or incompatible wastes are complied with. Additional information for the management of these wastes in the landfill is contained in Section 2.5.3.6.

### **5.5.3 Incompatible Waste Handling**

Generator waste profile forms (see Appendix H, Volume II) will provide Facility waste handlers with the necessary information to avoid mixing containers of incompatible wastes. Facility employees will be trained to recognize incompatible wastes and to prevent the mixing of such wastes. Incompatible wastes will not be placed in the same area of the landfill, but separated adequately to avoid all possibility of commingling in the landfill.

By the time any leachate generated from the landfill reaches the LCRS it will be sufficiently diluted, therefore, problems associated with incompatibles in the LCRS sump are not anticipated. Wastes will be solidified and stabilized prior to their placement into the landfill. These processes are performed to bind liquids and prevent leaching of any of the wastes' constituents. Therefore, any leachate generated within the landfill is not expected to contain significant levels of hazardous constituents. Due to the anticipated low concentrations of hazardous constituents in the leachate and the geographic separation of incompatible waste types, incompatibility problems within the landfill will be negligible.

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*This submittal supersedes all previous information.*

Containers of incompatible wastes will be stored in separate containment areas to prevent the potential for mixing. Incompatible wastes will be separated by the walkways and sloping floors towards the sumps that separate each cell. The drum handling unit will utilize seven separate cells for waste placement. Each cell is separated by a concrete berm/walkway and each bay has a separate sump. All incompatible wastes in drums will be stored in separate cells. These physical barriers along with defined operational procedures, will ensure that incompatible wastes will remain segregated. In addition, the design and operational procedures will ensure that incompatible materials will not be placed in the same container, nor will hazardous waste be placed in an unwashed container that previously held an incompatible waste (see Section 2.2.12).

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*This submittal supersedes all previous information.*

<b>TABLE 5-1 TRIASSIC PARK WASTE DISPOSAL FACILITY INSPECTION SCHEDULE</b>	
<b>INSPECTION ITEM - PROBLEM OR PROBLEM AREA</b>	<b>INSPECTION TIME</b>
<b>General Facility Perimeter</b>	
Facility guards will make rounds of the facility to detect any unauthorized entry to the facility or any other abnormalities	Daily
<b>Landfill</b>	
Liner and cover systems - uniformity, damage and imperfections in accordance with CQA plan	During construction and installation
Landfill and associated equipment	Weekly and after storms
Landfill spills, leaks, odors, windblown particulate	Weekly and after storms
Run-on/run-off control system – accumulation of liquids	Weekly and after storms
LCRS/LDRS presence of liquid and volume of liquid pumped	Daily and after storms
Leachate collection tank (while holding waste) for condition and proper function	Daily
Hazardous and organic gases	Quarterly
<b>Evaporation Pond</b>	
Liners and cover systems - uniformity, damage, and imperfections in accordance with CQA plan	During construction and installation
Pond freeboard for level for changes	Daily and after storms
Evaporation pond berms and area surrounding pond	Weekly
LCRS/LDRS for presence of liquid and volume of liquid pumped	Daily and after storms
Visible portions of the LCRS and LDRS pipes for deterioration	Weekly
Integrity of liners and associated systems	Weekly
<b>Container Storage Areas CD rom handling unit and roll-off unit</b>	
Condition of containers, warning signs, labels, other safety equipment aisle space	Weekly
Secondary containment condition, presence of liquid, and volume of liquid removed	Weekly
<b>Tanks</b>	
Condition of tanks, signs, other safety equipment, access routes, overfill control	Daily (when storing)
Secondary containment condition, presence of liquid, and volume of liquid removed	Daily
Leak test on ancillary equipment	Annually
<b>Stabilization Unit</b>	
Condition of unit when in operation	Daily
Condition of unit when empty	Monthly
Secondary containment condition, presence of liquid, and volume of liquid removed	Daily
<b>Security Equipment</b>	
Warning signs, perimeter fence and gates, lights and structures	Regular
<b>Safety and Emergency Response Equipment</b>	
Safety and emergency response equipment	Monthly

*This submittal supersedes all previous information.*

## 6.0 CONTINGENCY PLAN

The purpose of the Contingency Plan is to minimize potential hazards to human health and/or the environment in the event of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or water. Should any of these unplanned events occur, the procedures in this Contingency Plan will be immediately implemented. When these procedures are followed, the possibility of additional occurrences, recurrences, or spread of the initial emergency in such a way as to require additional emergency response measures will be minimized.

This Contingency Plan was specifically developed for the Facility. A final contingency plan will be provided to NMED and other response agencies 60 days prior to initiation of operations. The plan will be kept at the Facility, and controlled copies will be submitted to and updated at all police and fire departments, hospitals, and state and local emergency response organizations that may be called upon to provide emergency services. A list of these organizations is provided in Appendix J of Volume II. Initial site tours with all local emergency response organizations will be conducted to familiarize them with the facility prior to the start of operations.

The plan specifies Facility personnel who will be responsible for implementation of the plan. The plan also specifies the actions these individuals will take in the event of an emergency at the Facility. The plan includes a (1) description of the Facility layout; (2) the location of possible hazards; (3) the location of emergency and decontamination equipment; (4) evacuation plans and routes; (5) agreements with local emergency personnel; and, (6) an up-to-date list of names, addresses, and telephone numbers of Facility personnel qualified to act as EC.

### 6.1 GENERAL RESPONSIBILITIES OF THE EMERGENCY COORDINATOR

The Facility will train a minimum of five employees to serve as the EC for the Facility. Only one individual at a time will be designated as the primary (on-duty or on-call) EC. Others will be specified as alternate ECs. A list of personnel qualified as ECs will be provided in Appendix K in Volume II prior to waste receipt. Individuals will be listed by name, address, and telephone number. The list will also indicate the order in which each will assume responsibility as ECs. In accordance with 40 CFR 264.52(d), which states, "For new facilities, this information must be supplied to the Regional Administrator at the time of certification, rather than at the time of permit application", the list will be provided to the director of the NMED or designee (NMED Director) prior to receipt of waste and will be kept current both at the Facility and with emergency response organizations.

An acting EC will be either physically at the Facility or on call 24 hours a day, 365 days a year. Each EC will have authority to commit resources needed to carry out the provisions of the Contingency Plan.

The EC will be responsible for implementing the Contingency Plan, coordinating all emergency response efforts, determining the extent of the emergency, assessing hazards to human health and the environment, and completing necessary reports associated with the incident. Each EC will be thoroughly familiar with (1) the Facility layout and operations; (2) all aspects of the Facility's Contingency Plan; (3) the location and characteristics of hazardous materials, hazardous waste, and waste handling activities at the Facility; (4) the location and operation of emergency response equipment; (5) evacuation plans and routes; and (6) the location of all Facility records.

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After an emergency has been brought under control, the EC will assume responsibility for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that is generated as a result of the release, fire, or explosion at the Facility.

If the EC becomes injured or is otherwise unable to serve as EC during an emergency, a designated operations manager will assume the role of EC until an alternate EC is notified and arrives on the scene.

## **6.2 CIRCUMSTANCES DICTATING IMPLEMENTATION OF THE PLAN**

The Contingency Plan must be immediately implemented under any of the following circumstances:

- a fire or explosion occurs resulting in the release of a hazardous waste or involving an active hazardous waste management unit;
- a spill, leak, or other release of hazardous waste or hazardous waste constituents to the air, soil, or surface water occurs that could threaten human health or the environment;
- an indoor spill, leak, or other release of hazardous waste occurs to a secondary containment area that is not removed within 24 hours; and/or,
- a hazardous waste incident occurs resulting in an injury requiring more than basic first aid.

The plan will be implemented any time the EC believes that an event occurring at the Facility has the potential to adversely affect human health or the environment. The plan may also be implemented for other reasons at the discretion of the EC.

During the initial discovery and assessment phase of an incident, the EC will obtain information, including the type and quantity of released material and/or injuries that have occurred. At this time, the EC may consult with environmental specialists and other appropriate personnel to determine whether the incident warrants implementation of the RCRA Contingency Plan.

## **6.3 IMPLEMENTATION PROCEDURES**

Response procedures for emergencies often vary significantly, depending on the specific details of the incident. However, several response procedures are common to all incidents and include the following elements, which are further detailed in this section:

- discovery of incident and request for assistance from emergency response personnel;
- identification and characterization of released or suspected released material;
- assessment of hazard;
- off site notification and evacuation criteria;
- response and control procedures;
- measures to prevent recurrence or spread; and,

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- storage and treatment of released hazardous waste.

### **6.3.1 Discovery of Incident and Request for Assistance from Emergency Response Personnel**

The individual who first discovers an incident or emergency will quickly determine whether the situation is immediately life threatening or non-life threatening. The steps taken in each of these scenarios are briefly described below, although they are likely to vary based on occurrence.

#### **6.3.1.1 Life-Threatening Situations**

All Facility employees will be instructed and trained on response to a life-threatening situation or life-threatening release of materials. Employees will first relocate to a safe area, if necessary, then immediately notify the EC and/or emergency response personnel as the situation warrants, using the methods described below.

*Verbal*—In some cases, verbal communication within a building or between buildings will be the fastest way to disseminate emergency information and/or evacuate the area of an emergency.

*Telephone*—Employees will be instructed to immediately relocate to a safe area, if necessary; appropriate emergency response personnel can be notified by dialing 911 (without first notifying the EC if a particular situation appears to be immediately life-threatening or serious); the EC must be immediately notified of the actions taken.

*Fire-Pull Station*—The fire-pull station may also be used to alert the fire department and Facility personnel of an emergency. Although this type of alarm does not allow verbal communication with the fire department, it does activate a local fire alarm bell at the Facility and a remote alarm signal at the fire department.

Facility personnel will be trained for initial response to onsite fires. When the alarm is activated, onsite personnel may use fire extinguishers or the application of soil and/or water to suppress fires, when appropriate. The Roswell Fire Department will respond to fires beyond the control of site personnel. Response time for the Roswell Fire Department is approximately 30-45 minutes.

Fire-pull stations will be located at the administration building, the entrance to the landfill, the drum handling unit, and the stabilization unit. Other possible locations of fire-pull stations may be established.

*Automatic Fire Detection/Sprinkler System*—All permanent Facility buildings will be equipped with automatic fire detection/sprinkler systems, which, when activated, will transmit an alarm directly to the security gate guard shack and the Roswell Fire Department. The fire department will immediately respond to any alarms.

*Public Address (PA) Or Paging System*—Each of the main buildings will be equipped with a PA or paging system, which will be used to inform employees of adverse conditions at the site and emergency response instructions.

*Hand-Held Radios*—Hand-held radios will be used to communicate with personnel who are out of range of voice communications, PA, or are working in areas with noise levels such that render the PA system inaudible in emergency situations.

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During non-operational hours, the EC will be notified by pager, radio, cellular telephone, or regular telephone. The EC will be at the scene as soon as possible to direct and coordinate emergency response activities.

If the EC determines that additional assistance from an off site agency or emergency response organization is needed or if immediate action is required to protect a local community population or to protect any visitors using the Mescalero Sands recreation complex and travelers at the rest stop on Highway 380 north of the Facility, the EC will contact the appropriate agencies or organizations. A list of these organizations is provided in Appendix J in Volume II. During response activities, two-way radios will be used for communication between responding groups and the EC.

### **6.3.1.2 Non-Life Threatening Situations**

Upon discovery of a non-life-threatening release of materials or other non-life-threatening but potentially serious emergency situation, all Facility employees will be instructed and trained to immediately notify the EC or their supervisor. The EC will evaluate the situation, notify appropriate personnel, and if necessary implement the Contingency Plan.

### **6.3.2 Identification and Characterization of Released or Suspected Released Material**

After the emergency situation has been discovered and appropriate response personnel have been contacted for assistance, the EC will immediately obtain the following information by process knowledge (his own or that of another employee): (1) observation; (2) review of Facility records, including material safety data sheets (MSDSs) and manifests; and/or, (3) chemical analysis of the material, if this becomes necessary. This information will determine the following:

- the character and amount of released waste;
- the exact source and extent of any released material;
- whether the release could move off site; if it is determined that the release could move off site, the EC must determine if any containment procedures have been implemented or whether such procedures should be implemented; and,
- any injuries or potential injuries resulting from the incident.

All containers of waste and material at the Facility will be labeled. Therefore, the identification and characterization work generally will be accomplished through visual inspection and process knowledge. Manifests and lists of the waste and locations of waste being stored at the Facility prior to disposal or treatment will be maintained at the Facility. This information will be used in lieu of the visual inspection noted above in cases where the danger of entering the incident area is high or the container labels have been obscured as a result of the incident.

Copies of the MSDSs for raw materials used at the site will be located in the administration building, in the EC's office, and at appropriate operations locations throughout the site. The information in these documents will be used to prepare a course of action.

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### 6.3.3 Assessment of Hazard

Concurrent with the waste identification and characterization phase of the emergency response, the EC will assess possible hazards to human health or the environment that may result from the emergency situation. Indirect and direct effects of the release, fire, or explosion will be considered during this assessment. Examples of direct and indirect effects include the impacts of any toxic, irritating, or asphyxiating gases that are generated or the effects of any hazardous surface water run-off from water or chemical agents used to control a fire.

During this phase of the emergency response, the EC will consider the following information to determine potential risk to human health or the environment:

- the location from which the material or waste is emanating;
- the weather patterns and wind direction at the time of the release; and,
- the characteristics of the released material, including physical, reactive, and human or animal toxicity.

The EC may choose to obtain emergency response guidance by contacting one or more of the emergency response organizations listed in Appendix J (Volume II) or by utilizing various spill control reference textbooks and MSDSs located in the EC's office.

### 6.3.4 Off Site Notification and Evacuation Criteria

If the EC determines that a release, fire, or explosion has occurred at the Facility that poses an immediate threat to onsite or off site human health and/or the environment, the findings will be reported to appropriate response personnel as follows:

- local authorities will be immediately notified if an emergency incident at the Facility could affect local areas and if evacuation of these areas is necessary. The EC will be available to assist appropriate officials in deciding whether local areas should be evacuated (evacuation plans are provided in Appendix L, Volume II); and,
- the local authorities will be notified with the following information:
  - ◇ the name and telephone number of the reporter;
  - ◇ the name and address of the Facility;
  - ◇ the time and type of incident that occurred;
  - ◇ the name and quantity of material(s) involved, to the extent that this is known;
  - ◇ the extent of injuries, if any; and,
  - ◇ the possible hazards to human health or the environment outside the Facility.

Coordinating agreements will be signed with federal, state, and local emergency response organizations. The agencies with which the Facility will enter these agreements are listed in

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Appendix J presented in Volume II. The agreements outline the conditions under which the agencies will be contacted and the roles they will assume during various emergency scenarios at the Facility. The agreements establish the EC as the lead coordinator of all emergency response activities at the Facility. The details of these agreements will be located in the EC's office and with each of the participating organizations. The agreements will be considered controlled documents and will be kept current by updating all copies each time a change is made. This ensures a coordinated response to all emergency situations.

The EC may contact one or more of the agencies, such as police, fire departments, or hospitals, as listed in Appendix J (Volume II), if additional assistance is needed at the site to protect community populations.

### **6.3.5 Response and Control Procedures**

Following proper notification of agencies and/or evacuation of the Facility, the EC will initiate response and control procedures. This effort will involve the use of emergency equipment, which is listed in Appendix M in Volume II. This list also includes equipment descriptions and locations.

Potential incidents for which response and control procedures are necessary will be grouped into three broad categories: (1) fires and/or explosions; (2) spills, leaks, or other releases; and (3) power failures. A brief discussion of emergency training requirements and the general procedures for handling each of these situations are described in the following sections.

Facility personnel and supervisors will receive safety training to enable them to respond to and handle various emergency situations that are not of a serious nature. In addition to this training, employees will participate in emergency response drills on a periodic basis. These drills will involve both internal responses and those response actions taken in conjunction with external emergency response personnel. Key personnel will be familiar with the use of emergency equipment and fire control structures available to prevent the spread of fires in their areas. To prevent recurrence of an incident, any faulty or defective monitoring equipment, valves, pumps, alarms, or other equipment will be repaired. If repair is not possible, the equipment will be replaced. The unit will not receive hazardous waste until the minimum required equipment for safe operation is fully functional.

Procedures for ensuring that incompatible wastes are not treated, stored, or located in areas where a spill has occurred are addressed in Section 6.3.7.

#### **6.3.5.1 Fire and/or Explosion Control Procedure**

If a fire or explosion occurs at the Facility that may impact an active hazardous waste management unit or hazardous material storage area, the Contingency Plan will be immediately implemented, as outlined in Section 6.3. The EC will assess the situation and direct the emergency response effort. The EC will also be responsible for advising emergency response personnel of the hazards associated with released materials and other areas that should be protected from the effects of the incident.

In the event that a fire cannot be brought immediately under control and hazardous waste or material are located in the path of the fire or in an otherwise dangerous place, the waste or materials will be relocated to a safer area, if possible. If this is not possible, the material may be sprayed with an appropriate fire suppressant, at the direction of the EC or under the advisement of fire department personnel.

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If an explosion is likely to occur, for example because a fire threatens to envelop ignitable waste, the EC may choose to evacuate the area, as described in Appendix L presented in Volume II.

Facility employees will be trained and advised to stay in their work areas during emergency situations, unless they are in immediate danger, until they receive further direction via the PA system or other method of communication. If evacuation is necessary, the EC will communicate this via the PA system and by other means, as necessary, and all employees will assemble at the administration building. If anyone is unaccounted for, emergency response personnel will conduct searches.

After the effected areas have been evacuated, re-entry will be authorized by the EC only after the fire has been extinguished and when the emergency has been resolved.

Any equipment used during the incident will be checked for contamination and cleaned and/or replaced prior to resumption of plant operations in the affected area. Any solutions or materials used to decontaminate the equipment will be managed as RCRA-regulated waste.

### **6.3.5.2 Spills, Leaks, or Other Releases Control Procedure**

All areas in which liquids are stored, managed, or potentially encountered (including tanks, containers, or secondary containment areas) will be inspected regularly for leaks, spills, deterioration, or damage in order to reduce the likelihood of an incident. However, on occasion, such incidents may still occur. This section describes the procedures for responding to spills, leaks, or other releases to containment areas or to the environment.

If Facility employees observe a spill, leak, or other release, whether during a formal inspection or during routine work, they will be instructed to contact the EC immediately and describe the situation in as much detail as possible, giving the following information, at a minimum:

- the location;
- material composition;
- approximate quantity; and,
- estimated extent of the release.

Based on this information (and additional investigation by the EC as necessary), the EC will determine whether to evacuate the area and/or implement the Contingency Plan.

As previously stated, if the EC is not available and if the situation is serious or life-threatening, employees will be instructed to dial 911 for emergency assistance. In a life threatening situation personnel may call 911 without first notifying the EC. The EC will then be notified of the employee's actions. Upon notification, the EC will conduct a visual inspection of the release and will then implement immediate containment measures.

### **Releases Within Containment**

The EC will implement the following procedures for responding to leaks or spills from tank systems or containers into secondary containment areas that are not likely to reach the environment:

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- the tank system or secondary containment area will be removed from service and the flow of waste stopped;
- the unit will be inspected to determine the apparent cause of the leak or spill;
- all waste released to a secondary containment area will be removed from the secondary containment systems within 24 hours after detection of the leak, or as timely as possible, to prevent harm to human health and the environment;
- leaking containers will be placed in an overpack drum or will have the contents transferred to another container; and,
- affected tank systems will be repaired or replaced (if replaced, the old systems will be closed) prior to returning them to service. All released materials will be removed prior to returning the unit(s) to service. Extrusion repairs to geomembrane liners or metal welds to steel containers will be certified by a qualified registered professional engineer. This certification will be submitted to the regional administrator.

### Releases to the Environment

The EC will implement the following procedures for responding to leaks or spills from units that are likely to reach the environment:

- as previously stated, if uncontrolled releases of ignitable, corrosive, reactive, or toxic materials are involved in the incident, the affected area will be evacuated;
- response personnel will be directed to the incident location to aid in preventing further migration of the leak or spill to soils or surface water, provided that this can be accomplished safely. This effort will involve the use of industrial absorbents, sorbent dams, or other similar materials. If the release is determined to be beyond the capabilities of Facility personnel, the EC will contact one of the emergency response organizations listed in Appendix J (Volume II ) for assistance;
- the EC will monitor the status of the incident and direct emergency response personnel until the emergency condition no longer exists;
- when the incident has been brought under control, the EC will coordinate and instruct response personnel to begin cleanup and decontamination operations. These will involve containing and collecting any released material, including liquid releases, contaminated sorbent materials, visibly contaminated soils, and any other waste materials generated during cleanup or decontamination. These items will be removed and properly disposed of, generally by placing the wastes into DOT-approved containers (such as 55-gallon drums), sampling the waste or otherwise determining its constituents, and handling the waste accordingly. All liquids, including the originally released material and any liquids generated during cleanup (unless other circumstances or knowledge preclude this effort) will be pumped into drums and samples taken and analyzed to determine an appropriate course of action;

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- if soils or surface water are visibly affected, they will be removed until the contaminant concentration in the remaining soil or water is at or below appropriate levels for the contaminants of concern;
- the EC will then use whatever means are necessary to determine if the released material is a hazardous substance as defined in 40 CFR 302. The EC will then determine whether the amount of released material is a reportable quantity. If the amount is a reportable quantity, the following steps will be taken:
  - ◇ waste that could be released to the environment because of a leak in a tank system will be removed from the tank within 24 hours of the detection of the leak, or, if this is not possible (impracticability must be demonstrated to the NMED), it will be removed at the earliest practicable time. In such a case, as much waste as is necessary to prevent further releases to the environment will be removed from the tank system, enabling inspection and repair of the system;
  - ◇ the EC will report the release to the NMED Director within 24 hours of detection;
  - ◇ the National Response Center will be advised of the situation within 24 hours of the incident;
  - ◇ an internal report describing the situation and corrective measures necessary to prevent a recurrence will be prepared; and,
  - ◇ a written report will be filed with the NMED Director within 30 days of detection, as described in Section 6.4.2 and
- if the quantity of the spill or leak is less than or equal to 1 pound and is immediately contained and cleaned up or is less than a reportable quantity of material, a Facility employee will be assigned to report on the situation and determine what, if any, follow-up actions are necessary after cleanup.

#### **6.3.5.3 Evaporation Pond Failure Control Procedure**

The evaporation pond will be removed from service if the level of liquids in the pond suddenly drops and the drop cannot be attributed to known flowrate changes into or out of the pond or if they are exceeded. The major source of volume reduction from the pond is anticipated to result from evaporation. Liquid may also be pumped out of the pond, for example if a heavy rainfall event causes the water level to rise above the required freeboard elevation. Liquid levels in the evaporation pond will be monitored using a measuring staff gauged either in inches or in tenths of a foot. Daily evaporation losses will be compared to daily evaporation rates obtained from the nearest NOAA weather station. Currently this is the Bitter Lakes Wildlife Refuge station, as evaporation rates are not measured at the Roswell and Tatum stations. If liquid losses exceed daily evaporation losses and no other reasonable explanation is found, then the evaporation pond will be shut down and the authorities at NMED will be notified immediately.

When a pond must be removed from service, the following steps will be taken:

- the flow of waste into the pond will be immediately shut off;

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- any surface leakage that has occurred will be contained;
- the leak will be stopped as soon as possible;
- any other necessary steps will be taken to stop or prevent a catastrophic failure of the unit; and,
- in the event that the leak cannot be stopped by any other means, the pond will be emptied.

Several options are available to empty an evaporation pond. Due to the two-sided nature of the single evaporation pond, if a leak occurs in one side, liquid can be transferred to the other side while repairs are being made. Other options, if the leak is on both sides of the pond, include setting up temporary double-lined ponds, temporary double-lined bladders, temporary portable double-lined tanks, or using tanker trucks. These short-term storage measures are intended only to allow storage capacity during a major pond repair effort. The wastes would be transferred into and out of the tanks using existing or temporary pumps.

- Notification will be made to the Chief of the Hazardous and Radioactive Materials Bureau. An oral report will be made within 24 hours. A written report will be submitted within 7 days. An unexplained drop in the level of the evaporation pond would qualify as a noncompliance that may endanger human health or the environment, and 40 CFR 270.30 (l)(6) requires 24-hour notification for such events.

A written procedure for complying with use of temporary double-lined ponds, double-lined bladders, portable double-lined tanks or tanker trucks will be included in the final contingency plan that will be prepared prior to the acceptance of waste at the Facility. This procedure will be written to ensure that all repairs will be made in accordance with approved designs, specifications, and CQA Plan for the pond. All repairs will be done under the supervision of a New Mexico registered professional engineer.

If the evaporation pond is removed from service, it will not be put back into service until it is repaired. If the unit was removed from service as a result of a sudden drop in the liquid level, and the drop in the liquid level was caused by failure of the liner, then either a new liner (in compliance with 264.221[a]) must be installed, or the old liner must be repaired and certified by a qualified engineer that it meets the design specifications approved in the permit. If the pond is not to be repaired, or is not repairable, it will be closed in accordance with the provisions of 264.228 and the approved closure plan.

In the event that the evaporation pond is removed from service due to actual or imminent failure of any portion of the pond dike system, the evaporation pond will not be placed back in service until necessary repairs are completed and inspected, and the structural integrity of the dike is recertified by a New Mexico registered professional engineer. This recertification process will be done in accordance with 40 CFR 264 .226(c) and 40 CFR 264 .227(d)(1).

#### **6.3.5.4 Power or Equipment Failure Control Procedure**

The Facility will be equipped with at least one backup generator for emergency power generation to critical equipment only, which may include laboratory and administrative equipment. The generators may also be used to power safety equipment, such as smoke detectors and tank emergency cut-off or bypass mechanisms. The details of this system will be made available as the Facility design is completed. This emergency system will be started within 30 minutes of a power failure.

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In the event of a power failure, all waste processing equipment will be shut down and all waste transfer and management activities will cease until power is restored.

Equipment that fails but does not result in an emergency incident, such as a fire or explosion, will be promptly repaired or replaced. If emergencies arise as a result of the equipment failure, they will be handled as described in previous sections.

### **6.3.6 Measures to Prevent Recurrence or Spread**

During an emergency, the EC will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste areas at the Facility. These measures will include the following, where applicable:

- stopping processes and operations in specific areas of the plant or the entire plant itself; shut-down procedures for processing operations will be maintained in the administration building as well as at specific operating locations;
- collecting and containing released waste as described in Section 6.3.5.2; and,
- removing or isolating containers from the emergency at hand, as described in Section 6.3.5.1; if a material cannot be moved because of danger associated with a fire, the material may be sprayed with an appropriate fire suppressant, as directed by the EC or authorized fire official.

If the Facility ceases operations because of an emergency, the EC or a designated individual will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

A preventive maintenance order schedule will be prepared to ensure that monitoring equipment, valves, pumps, alarms, and other equipment will be maintained in good working order. If any of the equipment is found to be faulty or defective, it will be repaired or replaced.

### **6.3.7 Storage and Treatment of Released Hazardous Waste**

Concurrently or immediately after the emergency has been addressed and cleanup procedures have been completed, the EC will make arrangements for the containerization and storage, treatment, or disposal of any waste generated during the incident. The waste will be assumed to be RCRA-regulated until process knowledge or sampling and analysis can be used to determine the actual nature of the waste. Sampling and analysis will be accomplished in accordance with the Waste Analysis Plan in Section 4.0. The material will be placed in DOT-approved containers and stored as RCRA-regulated waste in the drum-handling unit or roll-off container area until a determination is made. If the waste is determined to be RCRA-regulated, it will be labeled and stored accordingly until it is treated or disposed of in accordance with applicable RCRA regulations and permit conditions.

If the waste generated during the cleanup is determined to be incompatible with other wastes stored or treated at the Facility, the incompatible waste will be labeled as such and physically separated from other incompatible waste. In addition, existing waste at the Facility that may be incompatible with the waste generated during cleanup will not be treated, stored, or disposed of until cleanup activities are completed and the cleanup waste is safely containerized and segregated from the existing waste.

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## 6.4 POST-IMPLEMENTATION PROCEDURES

Following implementation of the Contingency Plan and resolution of the incident, all emergency equipment used during the effort will be made ready for future use. Necessary reports will be prepared and filed at the Facility and with regulatory agencies. These post-implementation procedures are detailed in the following sections.

### 6.4.1 Post-Emergency Equipment Maintenance

All emergency equipment listed in Appendix M (Volume II ) of this Contingency Plan will be cleaned, repaired, or replaced so that it is fit to use before plant operations in the affected area are resumed. If the equipment cannot be adequately cleaned, it will be disposed of as hazardous waste. If it cannot be repaired and is not contaminated, it will be disposed of as non-hazardous waste.

Documentation of post-emergency equipment maintenance will be provided to NMED prior to resumption of operations in the affected area of the plant.

### 6.4.2 Required Reports and Notification

During and after certain emergency situations, as described in previous sections of this plan, specific types of reports or notification will be required. The EC will determine when, or if, off site notification and reporting are required for certain scenarios. The various reporting and notification requirements are mentioned in the appropriate sections of the Contingency Plan but are detailed here for purposes of clarity.

After the plan has been implemented, if the EC determines that the Facility has had a release, fire, or explosion that could threaten human health or the environment outside the Facility, the EC must immediately notify either the government official designated as the on-scene coordinator for the geographical area or the National Response Center. The report must include the following information: (1) the name and telephone number of the reporter; (2) the time and type of incident; (3) the name and quantity of material(s) involved, to the extent that this information is known; (4) the extent of injuries, if any; and (5) the possible hazards to human health, or the environment, outside the Facility.

If the EC determines that evacuation of local areas may be advisable, appropriate local authorities will be immediately notified. The EC must be available to help appropriate officials decide whether local areas should be evacuated.

Any release to the environment which threatens human health or the environment must be reported to the NMED Director within 24 hours of detection. If the release is reported pursuant to 40 CFR Part 302, that report will satisfy this requirement. Any release involving a reportable quantity of a hazardous waste as defined in 40 CFR 302.4 will be reported to the National Response Center within 24 hours.

Within 24 hours of implementing the Contingency Plan, the EC must notify NMED. The owner or operator must note in the operating record the time, date, and details of any incident that requires implementation of the Contingency Plan.

As required by 40 CFR 264.56(j), within 15 days of the incident, the EC must submit to the NMED Director a written report on the incident. The report must include the following information: (1)

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the name, address, and telephone number of the owner or operator; (2) the name, address, and telephone number of the Facility; (3) the date, time, and type of incident; (4) the source and cause of any release to the environment; (5) the name and quantity of material(s) involved; (6) actions taken to mitigate damage due to the release; (7) the extent of injuries, if any; (8) an assessment of actual or potential hazards to human health or the environment, where this is applicable; and (9) the estimated quantity and disposition of recovered material that resulted from the incident.

Within 30 days of detection of a release to the environment, a report containing the following information will be submitted to the NMED Director: (1) the likely route of migration of the release; (2) the characteristics of the surrounding soil (soil composition, geology, hydrogeology, climate); (3) the results of any monitoring or sampling conducted in connection with the release, if available (if sampling or monitoring data relating to the release are not available within 30 days, these data must be submitted to the NMED Director as soon as they become available); (4) the proximity of the incident to downgradient drinking water, surface water, and populated areas; and (5) a description of response actions that were taken or are planned.

The NMED Director and state and local authorities will be notified when the Facility is in compliance with 40 CFR 264.56(h), which states that no waste that is incompatible with the released material can be treated, stored, or disposed until cleanup procedures are completed, and all equipment must be fit for its intended use prior to resuming operations.

## **6.5 DOCUMENTS TO BE MAINTAINED ONSITE AS PART OF THE PERMIT**

Following the resolution of emergencies, various documents must be prepared and maintained onsite as part of the operating record. These documents are discussed in previous sections of this plan and are summarized below.

Copies of the Facility- and building-specific evacuation plans will be maintained in the administration building and at each location for which evacuation plans will be prepared. These documents will be submitted to the NMED within 30 days of the effective date of this permit.

An up-to-date list of all satellite and 90-day accumulation areas, if any are utilized at the Facility, will be maintained at the Facility and provided to the NMED inspectors upon request. Prior to accepting waste at a satellite or 90-day accumulation area for the first time, NMED will be provided with a description and location map.

A list of authorized ECs and their home telephone numbers will be maintained in the administration building, in all other buildings and emergency stations at the site, and in all controlled copies of the Contingency Plan.

A list of coordinating agreements that outline the situations and criteria under which outside help is needed will be maintained in the administration building and in all controlled copies of the Contingency Plan. This list will include the role of each emergency response authority in an emergency.

Coordinating Agreements will be put in place with local, state, and federal agencies for responding to emergency incidents that may occur at the Facility. The Facility will formalize Coordinating Agreements with those organizations listed in Appendix J (see Volume II) no later than 60 days prior to receipt of first waste.

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A current evacuation plan will be maintained in the EC's office. Appendix L presented in Volume II provides a general Evacuation Plan for the Facility. The Facility will finalize this Evacuation Plan with details of building-specific evacuations after the Facility design has received final approval from NMED. It is proposed that the Facility will submit the criteria for determining when site evacuations are necessary within 30 days of the effective date of the permit and that final evacuation plans and procedures be submitted following final NMED approval of the Facility design.

A current version of the emergency and spill response equipment list presented in Appendix M (Volume II) will be maintained in the EC's office and in each of the controlled copies of the Contingency Plan.

The operating record for the facility will be updated with the time, date and details of any incidents that require implementation of the Contingency Plan.

## 6.6 AMENDMENT OF CONTINGENCY PLAN

If the Contingency Plan is implemented, the circumstances under which it was implemented will be thoroughly reviewed to investigate the following:

- why the incident occurred and the cause for the occurrence;
- what measures were taken to prevent a recurrence; and,
- what measures will be taken to reduce the risk of having a similar occurrence in the future.

The Contingency Plan itself will be reviewed by the EC and/or the Facility owner and immediately amended, if necessary, whenever any of the following events occur:

- the Facility permit is revised;
- the plan fails in an emergency;
- changes occur to the Facility design, construction, operation, maintenance, or other circumstance that materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or that change the response necessary in an emergency;
- the list of ECs changes; or,
- the list of emergency equipment changes.

Because the Contingency Plan is a controlled document, any changes will be made in the following manner: (1) inaccurate or out-of-date pages will be directly replaced with new pages containing the modified or additional information; (2) the corrected pages will be issued to all agencies and organizations that have controlled copies of the plan; and, (3) old pages will be removed from copies of the plan and discarded. These steps will ensure that each organization has a current version of the plan.

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## 7.0 PERSONNEL TRAINING

The personnel training program for the Facility will be developed in accordance with 40 CFR 264.16 as adopted by the State of New Mexico in the New Mexico Hazardous Waste Management Regulations, Part V. This plan documents training procedures to be used by the Facility for all new employees and refresher training for experienced workers to ensure that all employees perform their work in full compliance with 40 CFR 264.16.

As illustrated in Figure 7-1, personnel will be divided into three categories for the purposes of the RCRA training: Facility personnel, visitors, and off site emergency response personnel. Facility personnel will be further categorized based on whether or not they will handle hazardous waste. Personnel will receive training appropriate to their specific job responsibilities. All Facility personnel will be required to complete classroom training within six months of employment and annually according to the requirements of the CFR 264.16. Employees who will handle hazardous waste and supervisors of employees who will handle hazardous waste will be required to complete on-the-job training (OJT) and OSHA 40-hour training and annual refreshers. Employees assigned to the Facility will not be allowed to work without direct supervision until completing the training program relevant to the positions in which they are employed. New personnel will be required to complete their training program as soon as practicable, but no later than six months, following their effective date of employment at the Facility.

Section 7.1 describes job titles, qualifications, and duties; Section 7.2 describes training content and frequency; and Section 7.3 describes record keeping procedures.

### 7.1 JOB TITLES AND DUTIES

To facilitate safe and effective Facility operation, the training program is designed to provide training commensurate with job responsibilities. A list of qualifications, duties, and special training required for appropriate personnel will be developed and maintained onsite prior to commencement of operations. This section includes a description of the qualifications and responsibilities of the RCRA training officer, the EC, waste handlers, the site security officer, laboratory specialists, and maintenance personnel. Although other categories of personnel may work at the site, these six categories include key personnel with respect to ensuring safety and compliance and therefore are included in this section. It is important to note that one person may fulfill the responsibilities of more than one of the job categories outlined below.

#### 7.1.1 RCRA Training Officer

The RCRA training officer will be responsible for developing and implementing a RCRA training program that is in compliance with 40 CFR 264.16, Personnel Training.

**The RCRA training officer will possess the following qualifications:**

- a four-year science or engineering degree or sufficient experience in hazardous waste management to oversee the training program;
- working knowledge of the New Mexico Hazardous Waste Act and the New Mexico Hazardous Waste Management Regulations;
- knowledge of site-specific hazardous waste management procedures;

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- a thorough understanding of the purpose of the Contingency Plan and emergency procedures and the ability to implement them; and,
- 40-hour OSHA and annual refresher training.

**The RCRA training officer will have the following responsibilities:**

- developing and implementing the RCRA training program, including classroom training development and revision;
- establishing course curricula;
- conducting training;
- maintaining and updating, as needed, a list of all employees requiring training; this list will provide a personalized training history for each employee, which includes job title, training schedule, course attendance, and test results;
- reviewing any new job classifications to determine if on-the-job-training (OJT) is required (supervisors may also request that employees receive OJT);
- scheduling training;
- ensuring that all personnel with RCRA responsibilities are trained as soon as practicable following the effective date in a position and are annually updated; and,
- conducting an annual review to determine which personnel require OJT.

### **7.1.2 Emergency Coordinator**

The EC will coordinate all emergency response activities and will have the authority to commit the resources necessary to implement the Contingency Plan contained in Section 6.0. The Facility will appoint a primary EC as well as secondary ECs to ensure that someone is always available to serve as the EC. The secondary ECs must meet the same qualifications and responsibilities, outlined below, as the primary coordinator.

**The EC will possess the following qualifications:**

- a four-year science or engineering degree or sufficient experience in hazardous waste management and emergency response to coordinate all aspects of emergency response;
- working knowledge of the New Mexico Hazardous Waste Act and the New Mexico Hazardous Waste Regulations;
- familiarity with all aspects of the Contingency Plan and emergency procedures, all operations and activities at the Facility, the location and characteristics of waste handled, the location of records within the Facility, and the Facility layout prior to acting as EC; and,
- 40-hour OSHA training, annual refreshers, and OSHA supervisor training.

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**The EC will have the following responsibilities:**

- either being on the Facility premises or being available to respond to an emergency by reaching the Facility within a short period of time;
- notifying all appropriate Facility personnel upon awareness of an emergency situation;
- notifying all appropriate state or local agencies with designated response roles;
- identifying the character, exact source, amount, and extent of any released materials;
- assessing possible hazards to human health and the environment that may result from a release, fire, or explosion;
- notifying local authorities if a release, fire, or explosion has occurred that could threaten human health or the environment;
- notifying the National Response Center if a release, fire, or explosion occurs that could threaten human health or the environment;
- taking all reasonable measures during an emergency to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the Facility;
- if appropriate, when the Facility ceases operations in response to a release, fire, or explosion, monitoring for leaks, pressure build-up, gas generation, or ruptures in equipment;
- providing for the treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the Facility;
- ensuring that no waste that may be incompatible with the released material is treated, stored, or disposed until cleanup procedures are completed and that emergency equipment is cleaned and fit for its intended use prior to resumption of operations;
- notifying NMED and appropriate local authorities before operations are resumed;
- noting in the operating record the time, date, and details of any incident that requires implementing the Contingency Plan; and,
- submitting a written report to the NMED within 15 days of implementing the Contingency Plan.

**7.1.3 Waste Handlers**

Waste handlers will perform sampling, screening, unloading, transfer, storage, and loading of material.

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**The waste handlers will possess the following qualifications:**

- high school diploma or equivalent; and,
- two years of experience in hazardous waste operations.

**The waste handlers will have the following responsibilities:**

- verifying waste received;
- testing emergency equipment;
- inspecting Facility and emergency equipment;
- managing containers in such a way as to prevent leaks, spills, and ruptures;
- inspecting container storage areas, tanks, the evaporation pond, and the landfill;
- inspecting roll-off containers and drums for cracks or holes.
- repair of defects on roll-off containers and drums.
- inspection of non-regulated but potential SWMU units;
- maintaining run-off management system, control wind dispersal, and ensure compliance with other operational requirements specific to the RCRA permit;
- assisting in maintaining the operating record; and,
- preparing biennial reports, unmanifested waste reports, and other reports as necessary.

**7.1.4 Site Security Officers**

The site security officers will control access to the Facility, ensure site security, and possess high school diplomas or equivalent.

**The site security officers will have the following responsibilities:**

- controlling entry, at all times, through gates or other entrances to the active portion of the Facility;
- ensuring site security;
- inspecting the perimeter fence to prevent unknowing entry and prevent the unauthorized entry of persons or livestock onto the active portion of the Facility; and,
- initially locating and then maintaining warning signs that indicate “Danger - Unauthorized Personnel Keep Out” in both English and Spanish, which will be posted on the perimeter fence and will be legible from a distance of 25 feet.

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### **7.1.5 Laboratory Specialist**

The laboratory specialist will help to assure that wastes received at the Facility are consistent with waste profiles supplied by generators.

**The laboratory specialist will possess the following qualifications:**

- a four-year science degree or sufficient experience to adequately perform acceptance testing;
- working knowledge of the New Mexico Hazardous Waste Act and the New Mexico Hazardous Waste Regulations; and,
- familiarity with the Waste Analysis Plan and waste analysis practices and procedures.

**The laboratory specialist will have the following responsibilities:**

- developing sampling, characterization, and testing procedures for waste received and generated at the Facility;
- directing or performing sampling, characterization, and testing for the Facility;
- determining if waste is acceptable for treatment, storage, and disposal according to waste profile information submitted by the generator;
- determining if fingerprint testing confirms generator information provided on the waste profile and manifest; and,
- implementing the laboratory QA/QC program.

### **7.1.6 Maintenance Personnel**

Maintenance personnel will maintain all equipment, buildings, and roads.

**Maintenance personnel will possess the following qualifications:**

- high school diploma or equivalent; and,
- two years experience in an industrial setting.

**Maintenance personnel will have the following responsibilities:**

- developing maintenance procedures; and,
- performing maintenance-type activities, including repairs, preventive maintenance, and corrective actions associated with RCRA inspections.

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## 7.2 TRAINING CONTENT AND FREQUENCY

Section 7.2.1 describes the training program for Facility personnel, Section 7.2.2 describes training for visitors, and Section 7.2.3 describes training for off site emergency response organizations.

### 7.2.1 Training Program for Facility Personnel

All new employees will be required to successfully complete the training program related to their position. Training programs will include RCRA classroom training, OJT, OSHA 40-hour training, and annual refresher training for all three programs. The OJT and OSHA 40-hour training sessions will be required only for those personnel who will handle hazardous waste and the supervisors of personnel who will handle hazardous waste. Employees will not be permitted to assume unsupervised job duties until successful completion of all the required elements of their training program. As soon as practicable following a new employee's hire date, successful completion of the training program specific to his or her position must be accomplished, and certification of the completion will be recorded and kept on file by the RCRA training officer.

#### 7.2.1.1 Classroom Training

The initial classroom training will consist of at least one 8-hour session. Annual refresher training will consist of at least one 4-hour session. The outline of the annual refresher is the same as the outline for the initial classroom training; however, the refresher training will be an abbreviated version of the initial training at an accelerated pace. The RCRA classroom training will include the following goals:

- developing a basic understanding of the regulatory requirements for a treatment, storage, and disposal facility;
- promoting understanding of policies and procedures necessary to protect human health and the environment;
- ensuring proper management of hazardous waste; and,
- educating employees regarding response to emergencies.

The outline for the RCRA training class will consist of the following elements:

- an introduction to RCRA, including a general description of RCRA and Hazardous and Solid Waste Amendments (HSWA); the definition of hazardous waste; waste generator requirements; treatment, storage, and disposal requirements; and labeling, inspection, record keeping, and reporting requirements;
- requirements associated with the RCRA permit for the Facility;
- Facility-specific waste management, including general procedures for receipt and handling of waste from off site as well as management of waste generated onsite;
- decontamination procedures;

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- emergency procedures, including response to fires, explosions, and releases, and shutdown of operations;
- emergency equipment location and use;
- emergency systems- such as- the- communication and alarm systems and the fire suppression system;
- Contingency Plan;
- evacuation plan;
- waste minimization;
- occupational health and safety, including items such as personal protective clothing and equipment, general industrial safety, and employee Right-to-Know (the Hazard Communication Standard);
- transportation of hazardous waste, including marking, labeling, placarding, loading, use of shipping papers, record keeping, and other DOT requirements; and,
- maintenance of documentation.

Facility tours and audio-visual aids in conjunction with lectures and procedure manuals will be utilized in the classroom training. A written test will be administered at the completion of classroom training. A grade of 80 percent or better will be required to demonstrate mastery of the course material. The course curriculum will be reviewed at least annually by the RCRA training officer to ensure that it is current and appropriate.

#### **7.2.1.2 Job-Specific Training**

The RCRA classroom training will be supplemented with OJT tailored to each employee's actual job responsibilities. All employees who handle hazardous waste and supervisors of personnel who handle hazardous waste will be required to complete OJT; employees who will not handle hazardous waste and will not directly supervise personnel who will handle hazardous waste will not receive OJT. The purpose of OJT is not to demonstrate to personnel how to perform their duties, but rather to demonstrate how to perform their duties safely and in compliance with RCRA.

OJT will be conducted in the work area by the line supervisor or foreman subsequent to classroom training. The length and complexity of the OJT will vary according to the employee's responsibilities; however, it is anticipated that OJT will take approximately 1 to 2 hours.

A checklist developed by the work area supervisor will be used for OJT. Prior to initial use of the checklist, it must be reviewed and approved by the RCRA training officer. All employees performing similar duties will have consistent OJT. The OJT checklist will be reviewed at least annually to ensure that it is current and appropriate for the subject job classification.

The OJT checklist will include the following elements:

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- information about procedures relevant to the individual's position, where these procedures are located, and which personnel have the authority to implement the procedures; key operating parameters and waste feed cut-off systems;
- location and use of communications or alarm systems;
- response to releases;
- emergency and routine shutdown of operations;
- Facility Contingency Plan and emergency procedures;
- evacuation procedures and location of emergency exits;
- response to leaks, spills, and overflows;
- Waste Analysis Plan procedures; and,
- inspection and maintenance procedures.

After the OJT checklist has been completed, it will be signed by both the employee and the supervisor. The checklist will be provided to the RCRA training officer, who will be responsible for maintaining training records.

#### **7.2.1.3 OSHA 40-Hour Training**

All personnel who handle hazardous waste and the supervisors of personnel who handle hazardous waste will complete OSHA 40-hour training as required by 29 CFR 1910.120. It is anticipated that, at least initially, the OSHA 40-hour training will be provided by an outside vendor. Personnel who have documentation of course completion for the 40-hour and refresher training will not be required to retake the 40-hour training.

#### **7.2.2 Training for Visitors**

Visitors who are expected to be in the Facility for only a short period of time and who will not be handling hazardous waste will be provided a short briefing on basic emergency procedures such as decontamination, emergency signals and alarms, and evacuation routes. Visitors will not be allowed onsite unless they are escorted by Facility personnel or unless other arrangements have been made with Facility personnel. The briefing will include the following information:

- what hazards that may be encountered at the Facility;
- how emergencies are signaled or announced, how help is summoned, what information is to be given, and to whom the information is given;
- where to report during an emergency;
- how to safely evacuate from the Facility;
- what standard operating procedures for visitors are;

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- where check-in/check out locations are; and,
- what safety equipment is required.

### **7.2.3 Training for Off Site Emergency Response Organizations**

Training will be established for off site emergency response organizations through agreements with local agencies and contracts with vendors. This training will include, as appropriate, the following:

- site layout and site-specific hazards;
- the Contingency Plan;
- Facility emergency procedures;
- Facility decontamination procedures; and,
- appropriate response techniques.

## **7.3 RECORD KEEPING**

In accordance with 40 CFR 264.16, records regarding job title, job description, training, and other appropriate documentation will be kept by the RCRA training officer.

### **7.3.1 Job Titles, Descriptions, and Duties**

Job titles will be designated for each position at the Facility related to hazardous waste management and the name of each employee filling each job. Job descriptions will detail job duties and responsibilities for that position. The description will include the skills, education, and qualifications required for each position. A written description for each position will be maintained to determine the types and amounts of both introductory and continuing training to be given to each employee at the Facility.

### **7.3.2 Training Documentation**

Records that document RCRA classroom training and OJT given to and completed by Facility personnel will be kept by the RCRA training officer. Training records on current employees will be kept until closure of the Facility. Training records on former employees will be kept for at least three years from the date the employee last worked at the Facility.

### **7.3.3 Other Documentation**

Other documentation to be maintained at the Facility, includes the following:

- documentation of the annual review of the curriculum for RCRA classroom training;
- documentation of the annual review of the OJT checklists; and,
- RCRA classroom training test results.

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Insert Figure 7-1, Facility RCRA Training Program

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## 9.0 WASTE MANAGEMENT

The purpose of this section is to describe the Facility Waste Minimization (WM)/ Pollution Prevention (P2) Program, which will be an organized, comprehensive, and continuous effort to systematically reduce waste generation during the life of the Facility. As such, the program will be ever-changing and expanding to incorporate new or more effective WM/P2 opportunities as they are developed. The level of detail in this description of the WM/P2 Program is commensurate with the level of detail currently available with respect to day-to-day operation of the Facility.

The Facility is committed to the prevention of all forms of pollution and the minimization of all wastes generated at its hazardous waste landfill. Source reduction of waste is the company's highest waste minimization priority, followed by recycling and reuse.

For an industrial facility, such as the Facility, a Waste Minimization Program is an important link to providing increased protection of public health, employee health, and the environment. As part of its WM/P2 Program, the Facility will develop a detailed WM/P2 Program Plan as soon as the intricate details of Facility operation are more clearly defined.

It is anticipated that only insignificant amounts of waste will be generated from site operations. Leachate and wastewater may be generated from the wastes placed in the landfill and from precipitation events. Other wastes that may be generated include waste oils and other maintenance wastes, office wastes, soil and debris from spills, personal protective equipment, excess chemicals, and freon. Not all of these wastes are expected to be hazardous. All site-generated waste will be stored, treated, recycled, reused, and/or disposed in accordance with applicable regulations. Waste minimization/pollution prevention efforts will be focused on all forms of waste, not just those wastes defined as hazardous in the New Mexico Hazardous Waste Management Regulations.

Waste minimization focuses on reducing the amounts and toxicity of waste materials generated from any process or other plant activity and on reusing, recycling, or reclaiming waste materials for future use and benefit. It should be noted that the terms waste minimization and pollution prevention will be used somewhat interchangeably throughout this section. However, the terms have distinctly different meanings, as defined below:

### Waste Minimization

Waste minimization is the reduction, to the extent feasible, of the amounts and toxicity of waste materials after they are generated from any process or other activity. Primary waste minimization techniques include reuse, recycling, or reclamation of waste materials for future use and benefit.

### Pollution Prevention

Pollution prevention is the use of any process, practice, or procedure to prevent the generation of waste. Examples of primary pollution prevention techniques include material substitutions (e.g., nonhazardous materials used in place of hazardous materials), process changes, and procedural improvements.

## 9.1 BRIEF HISTORY OF WM/P2 IN THE UNITED STATES

Current trends in environmental policy and regulation indicate a move from pollution control to pollution prevention and waste minimization in the private sector. Throughout the 1980s, the United States became increasingly aware of the environmental damage and restoration costs associated with

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past improper disposal of hazardous wastes. In the 1984 HSWA to RCRA, Congress declared that it is:

*. . . the national policy of the United States that, wherever feasible, the generation of hazardous waste is to be reduced or eliminated as expeditiously as possible. Waste that is nevertheless generated, should be treated, stored, or disposed of so as to minimize present and future threat to human health and the environment. From HSWA, Congress clearly intended a hierarchy of actions for managing the nation's waste problems, with priority given to reduction or elimination of waste over treatment, storage, and disposal of waste after it has been generated.*

The Pollution Prevention Act of 1990 expanded this concept to include all forms of environmental pollution. This statute calls pollution prevention a "National Objective" and establishes a hierarchy of environmental protection priorities as national policy. The order of priority is summarized as follows:

1. Reduction or elimination of waste prior to generation (source reduction) is the best option.
2. Recycling and reuse of waste that is generated is the second best option in cases when pollution cannot be prevented.
3. Treatment (reclamation or toxicity reduction) of waste that is generated is the next best option in cases where feasible prevention and recycling opportunities are not available or possible.
4. Disposal of generated waste is the least desirable option.

## **9.2 PURPOSE AND OBJECTIVES OF THE FACILITY WASTE MINIMIZATION/POLLUTION PREVENTION PROGRAM**

The purpose of this section is to describe the Facility WM/P2 Program. This Program will establish the strategic framework for integrating waste minimization and pollution prevention into all Facility activities. The objectives of the Program are the following:

- raising employee awareness about the reasons for and benefits of a WM/P2 Program and instilling a desire to minimize waste at the lowest organizational levels possible;
- describing planned initiatives that support and promote WM/P2 through various training opportunities, including recycling, reuse, and recovery programs, and good housekeeping practices;
- adapting and implementing existing technologies as rapidly as possible to reduce waste generation at the source and to recycle waste products; and,
- reducing all forms and categories of waste to the lowest extent practical.

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### 9.3 BENEFITS OF THE FACILITY WASTE MINIMIZATION/POLLUTION

The Facility WM/P2 Program, like all effective waste minimization programs, will yield numerous benefits and advantages, which are either tangible or intangible. Some of these benefits are listed below:

- reduced waste management costs, including labor and disposal costs;
- reduced regulatory compliance costs, including inspection costs and possible fines;
- reduced raw material costs;
- reduced potential for releases of hazardous chemicals and wastes;
- increased worker safety; and,
- reduced civil and criminal liabilities under environmental laws.

### 9.4 ELEMENTS AND GOALS OF THE FACILITY WM/P2 PROGRAM

As previously mentioned, the Facility will continue to expand and refine its WM/P2 Program during the life of the Facility. The elements of the Program include those methods commonly used to form the baseline, or starting point, for effective WM/P2 Programs. The elements and goals of the Program are listed below as action-items to be completed during the initial phases of Facility operations. Such listings are standard practice in the industry since many of the elements, waste generation levels for example, cannot be determined until after the Facility begins operation. The personnel tasked with oversight of this program will also oversee the planning, development, and implementation of the WM/P2 reduction methods and activities outlined below.

- develop and establish a written policy statement that describes why the WM/P2 Program is being implemented, how it will be implemented, and who will implement it. The policy statement will be issued from the highest level of management. The policy will be provided to each employee at the start of employment and will be reviewed during RCRA training and annual refresher training;
- assign Facility personnel to oversee, plan, develop, and implement the elements of the WM/P2 Program;
- establish support for the program at all levels in the company;
- determine a waste generation baseline at the site and establish a tracking method and waste minimization goals;
- establish a procurement control program to ensure the purchase of environmentally friendly materials and products while preventing the procurement of prohibited items from the site; the Facility will endeavor to reduce or eliminate the use of hazardous materials from its operations;

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- minimize the quantities of virgin products and raw materials allowed such as sorbents and other materials used in the stabilization process into the landfill. The Facility will endeavor to utilize other wastes (e.g., fly ash) in the stabilization process rather than virgin materials;
- establish reuse, recycling, recovery, and conservation programs to minimize the volume of generated waste requiring disposal or treatment; examples of such programs include paper, aluminum cans, cardboard, scrap metals, oil, batteries, and surplus materials and chemicals;
- establish good-housekeeping practices that promote WM/P2; an example of this type of practice is the requirement to remove packaging materials from chemicals, products, and equipment before they are introduced into the disposal area or contamination-control areas to avoid cross contamination;
- establish a WM/P2 awareness program and train employees, as appropriate;
- prepare a WM/P2 plan and update it annually or as appropriate;
- perform an assessment of waste minimization/pollution prevention opportunities; an example of this type of opportunity is: installation of air conditioning refrigerant reclamation systems; and,
- determine the feasibility of implementing the WM/P2 projects and proceed as appropriate with project implementation.

## 9.5 PROPOSED ELEMENTS OF THE FACILITY WM/P2 PROGRAM PLAN

The Facility will establish a WM/P2 Program Plan when operational details of the Facility, such as the chemical and equipment procurement processes and the actual level of waste generation, are determined. The WM/P2 plan will include the following elements, as appropriate:

- the written policy statement for WM/P2;
- a description of the roles and responsibilities of Facility personnel with respect to WM/P2 and a brief description of how Facility groups will work together to reduce waste generation and energy consumption;
- a plan or method for publicizing and gaining support for the program and communicating the successes and failures of waste minimization efforts (i.e., employee awareness program);
- a description of how employees will be informed about WM/P2 requirements and expectations (possibly within the context of other Facility training courses);
- a description of waste-generating processes, including a clear definition of the types and quantities of materials generated from each process;
- a description of recycling, reclamation, treatment, and disposal programs used by the Facility and the types of wastes and materials that are included in these programs;
- descriptions of other WM/P2 programs and initiatives;

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*This submittal supersedes all previous information*

- reporting requirements;
- a description of WM/P2 goals for the Facility;
- a description of the Facility's chemical and material procurement process;
- a review of the costs of waste management and disposal, both onsite and at other facilities;
- criteria for prioritizing candidate WM/P2 processes, activities, and waste streams for future implementation; and,
- an evaluation of the effectiveness of the WM/P2 Program and activities.

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*This submittal supersedes all previous information*

## 10.0 CORRECTIVE ACTION

It is unlikely that releases of hazardous waste or hazardous waste constituents have occurred on the site of the proposed Facility. This is based on an evaluation of (1) the site history; (2) reconnaissance of the site conducted as part of site characterization activities; and (3) a records review, which are described in the following paragraphs.

The current property owner is Marley Ranches Inc. Marley Ranches has owned the property since 1967 and has used it primarily for grazing of livestock. The previous owner, owned the property for two generations. Under the previous owner the property was used primarily for grazing of livestock.

The primary site characterization activities included drilling programs conducted in July 1993, September 1993, and July 1994. Supplemental investigations were also carried out in July 1995 and August 1999. Reconnaissance of the site was conducted as part of the site characterization activities and no evidence found of hazardous waste releases or hazardous constituents.

New Mexico Oil Control Division records were reviewed. An intermittent land use in the area is exploratory drilling for oil and gas wells. The record review indicated that there are no abandoned wells within the proposed Facility boundary, and the nearest production well is approximately 3 miles from the proposed site. In addition, aerial photographs of the site were reviewed. The review did not provide any indication of releases or structures or activities that could be a source of releases.

The New Mexico Environment Department conducted a RCRA Facility Assessment (RFA) in 1995. An RFA Report was prepared in September 1995. The RFA report identified several potential future SWMUs, including:

- the drum handling unit;
- roll-off storage area;
- the liquid waste receiving and storage unit;
- the stabilization unit;
- the evaporation pond;
- the landfill;
- the truck wash unit;
- the maintenance shop;
- the chemical laboratory;
- the stormwater retention basin;
- the untopping, sampling, and weigh scales area;
- the truck staging area;

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*This submittal supersedes all previous information*

- the future debris encapsulation unit;
- the future waste processing area;
- all roads, including those leading to the Facility;
- the clay processing area; and,
- the dust control/clay processing water basin.

No releases have occurred at these areas of concern because the structures do not exist and no Facility activities have occurred. An RCRA Facility Investigation (RFI) will not be conducted unless evidence of a release from a waste management unit is identified in the course of future groundwater or vadose zone monitoring, field investigation, environmental audits, or other means. The Facility will respond to any emergency in accordance with the Contingency Plan provided in Section 6.0, including notification and reporting. Specifically, any release which threatens human health or the environment must be reported to NMED within 24 hours of its detection, and any time the Contingency Plan is implemented. However, in some cases, such as small amounts of materials being released from SWMUs into contained buildings or onto impervious surfaces that are immediately cleaned up, a release from a SWMU will not trigger reporting under the Contingency Plan. All releases and response actions will be documented in the Facility operating record. The following information will be provided:

- the location of the release to the environment relative to the SWMU;
- the type and function of the unit;
- the general dimensions, capacities, and structural description of the unit;
- the period during which the unit was operated;
- information on the wastes that have been or are being managed at the SWMU; and,
- results of any sampling and analysis to determine whether releases of hazardous waste or hazardous waste constituents have occurred or may occur.

The Facility will also notify the administrative authority verbally, within 24 hours of discovery, of any release of hazardous waste or hazardous waste constituents that has the potential to migrate off site. The Facility will take immediate action to protect human health and the environment unless the Facility is unable to obtain access to a release that has migrated off site.

Additionally, when a release has occurred, an RFI will be conducted. The purpose of the RFI is to determine the extent and nature of releases of hazardous waste and hazardous waste constituents. The RFI consists of the following four tasks:

- review of pertinent literature and documentation;
- preparing of the RFI Work Plan;
- conducting the investigation; and,

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*This submittal supersedes all previous information*

- preparing the Final Report and Summary.

The results of the RFI may indicate that no further action is required. At this point, the Facility will write NMED requesting a Class III permit modification to remove the subject SWMU from further investigation. However, if the RFI indicates that a SWMU has released hazardous waste or hazardous waste constituents that pose a concern to human health or the environment, a Corrective Measures Study (CMS) will be required. A CMS consists of three tasks:

- preparing a CMS Plan;
- conducting the CMS; and,
- preparing a CMS Final Report and Summary, which includes a preferred alternative and a schedule for implementation.

The RCRA permit will be modified to include appropriate corrective action requirements.

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*This submittal supersedes all previous information*