



MONTGOMERY WATSON

RED TPDF 12001



January 17, 2001

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

Re: Insertion Instructions for revisions to the *December 1997 (Revised October 2000) Part A and Part B Permit Application for the Triassic Park Waste Disposal Facility*

Dear Ms. Kruse:

Pursuant to your request, we are submitting revised portions of the *Triassic Park Part B Permit Application* that was originally submitted in December 1997 (revised October 2000). We have included two hard copy versions along with a CD containing the electronic files.

These were revised based on comments received from NMED in December 2000 and January 2001. Please follow the instructions listed below for inserting these sections into the Permit.

- **Section 6 - Contingency Plan** (December 2000): Replace in Vol. I, Section 6, (pgs. 6.1 - 6.14)
- **Appendix K - List of Emergency Coordinators** (December 2000): Replace in Vol. II, Appendix K, (pg. K1)
- **Appendix L - Evacuation Plan** (December 2000): Replace in Vol. II, Appendix L, (pgs. L-1 through L-3)
- **Appendix M - Location, Description, and Capabilities of Emergency Equipment** (December 2000): Replace in Vol. II, Appendix M (pgs. M-1 through M-2)

If you have any questions, please contact us. We look forward to continuing to work with NMED to permit the Triassic Park Facility in 2001.

Sincerely,

Montgomery Watson

Patrick Corser, P.E.
Principal

cc: Dale Gandy
Ken Schultz
Trey Greenwood

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.

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.

This submittal supersedes all previous information.

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, storage and treatment of released hazardous waste.

This submittal supersedes all previous information.

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.

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.

This submittal supersedes all previous information.

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.

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.

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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 procedures are provided in Appendix L, Volume II and a site wide evacuation plan is provided in Drawing L-1, Appendix L, Volume II).
- 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.

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

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.

This submittal supersedes all previous information.

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.

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. A site wide evacuation plan is presented in Drawing L-1 in Appendix L, 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.

This submittal supersedes all previous information.

After the affected 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: 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,

This submittal supersedes all previous information.

- 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 NMED Secretary.

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;
- 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;

This submittal supersedes all previous information.

- ◇ 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; 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.

This submittal supersedes all previous information.

- 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.

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,

This submittal supersedes all previous information.

- 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.

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

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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) 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.

This submittal supersedes all previous information.

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.

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.

This submittal supersedes all previous information.

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.

This submittal supersedes all previous information.

APPENDIX K LIST OF EMERGENCY COORDINATORS

Since the Triassic Park Facility is not operational at this time only one Emergency Coordinator (EC) is proposed. Details of the EC are listed below:

Mr. Larry Gandy
Vice President
1109 E. Broadway
Tatum, NM 88267
(505) 398-4960

The names, addresses, and telephone numbers (office and home) of the additional Triassic Park Waste Disposal facility personnel who are qualified to act as emergency coordinators (EC) will be provided in this appendix prior to receipt of hazardous waste at the facility. The list will specify the primary EC and alternates in the order they will assume responsibility. This list will be provided to the Director at the time of certification. Copies of this list will also be distributed for inclusion in all controlled copies of the Contingency Plan.

This submittal supersedes all previous information

APPENDIX L EVACUATION PLAN

Evacuation plans are pre-established procedures designed to direct employees to safe assembly areas to ensure their personal safety. Evacuation plans are also designed to enhance the response effort in the event of an emergency. Emergencies that could threaten human health or the environment may require the evacuation of areas, buildings, the entire facility, or local areas surrounding the facility. A site wide evacuation plan is presented on Drawing L-1. This indicates primary assembly areas that are located upwind of the prevailing wind direction for the site. Specific building and area evacuation plans and maps will be prepared as appropriate. These specific plans and maps will be maintained and updated as necessary. The evacuation plans and routes will be addressed in area-specific training courses. A master copy of all evacuation plans for the facility will be maintained and updated by the Emergency Coordinator (EC).

Upon notification of an incident the EC will determine if the incident poses a potential threat to human health or the environment and will evacuate area(s) based upon his/her determination. Employees will assemble in pre-determined areas, outside buildings and away from processing areas as indicated in the evacuation plan.

The evacuation plans will describe the signals to be used to begin evacuations, evacuation routes, and alternate routes for various scenarios. Some of the scenarios included are:

- fires and/or explosions
- spills, leaks, or other releases
- power or equipment failures

Four types of evacuation plans, outlined below, will be prepared prior to acceptance of waste at the facility. In each case, the plans will address the proper response of employees for (1) public address (PA) announcements; (2) various types of alarms and their associated sounds; (3) the evacuation routes available to them from a specific area; (4) assembly areas; and (5) other safety-related issues. The four types of plans are:

1. *Process Area Shutdowns and Evacuations*

Emergency shutdown procedures will be prepared for each area and maintained at the specific processing location. These procedures will be used during on-the-job training to instruct and inform operations employees of the evacuation procedures for their specific area.

2. *Building Evacuation*

Building specific procedures will be developed prior to the receipt of waste at the facility. These procedures will be maintained in the building for which they are prepared and in the EC's office. The procedures will be used during on-the-job training to instruct employees on the proper response to a building evacuation.

This submittal supersedes all previous information.

The evacuation of a building will be initiated in one or more of the following ways:

- PA announcement from the EC, an emergency responder, or other operations personnel;
- an evacuation or emergency alarm; and,
- the employee's decision to evacuate for personal protection.

When an evacuation is announced all employees will immediately leave their work area and assemble at the designated assembly areas. Supervisors will account for all facility personnel and the sign in log will be used to account for non-facility personnel.

3. Facility Evacuation

Evacuation of the entire facility will proceed in a fashion similar to that of a building evacuation. If necessary additional means of communication will be used to ensure all personnel are aware of the site evacuation. Means of communication other than PA announcements might include:

- hand-held radio for personnel in areas of high noise or areas without PA capability;
- telephone;
- area alarms; and/or,
- messengers

If the incident site is upwind of the current building location employees and visitors will evacuate in a direction perpendicular to the wind direction. If the incident is downwind from the current location visitors and employees will evacuate in an upwind direction. Windssocks will be placed at strategic locations throughout the facility to ensure their visibility.

If possible employees and visitors will relocate to the entrance gate of the facility and await further instructions. If this is not possible, or if routes leading to the facility entrance are unsafe, then personnel will be instructed to assemble in a safe location so that all personnel and visitors may be accounted for.

4. Evacuation of Local Areas

If the EC's assessment indicates that evacuation of local areas may be necessary, the appropriate local authorities will be notified immediately. The EC will provide assistance, as necessary, to the appropriate officials in making area evacuation decisions and notifications. Notifications by the EC might include the government official designated as the on-scene coordinator for the geographical area or the National Response Center (1-800-424-8802).

This submittal supersedes all previous information

APPENDIX M LOCATION, DESCRIPTION, AND CAPABILITIES OF EMERGENCY EQUIPMENT

Details pertaining to the specific locations, physical descriptions, and capabilities of the emergency response equipment listed in this appendix will be provided to the New Mexico Environment Department (NMED) and other response agencies with the final Contingency Plan.

This preliminary list provides the types and possible locations for emergency response equipment for the facility. Once the Contingency Plan is finalized and submitted, equipment changes that occur at the facility will be provided to each agency and organization on controlled distribution for the Contingency Plan.

Diagrams will be posted at various locations throughout the facility with "You Are Here" references at each location. These diagrams will show the locations of safety equipment, alarms, and primary and alternative execution routes.

Emergency equipment that is anticipated for the facility includes:

Fire Control Equipment

- sprinkler systems
buildings
- fire extinguishers
buildings - 20 lbs. dry chemical
landfill emergency station - 20 lbs. dry
chemical
equipment - 10 lbs. dry chemical
trucks - 10 lbs. dry chemical
- building fire hoses
- landfill bulldozer
landfill (Caterpillar D5 to D8 or equal)
- mobile fire suppression
water/foam truck all areas
(approximately 1,000 gal tank)

Personal Protective Equipment-All buildings except administration and landfill emergency station

- tyvek suits and hoods
- saranex suits and hoods
- boot covers
- duct tape
- plastic tape
- respiratory protection
SCBAs (as necessary)
respirators with assorted cartridges
- rubber gloves

Spill Control/Decontamination Equipment-All buildings except administration and landfill emergency station

- site heavy equipment
- industrial absorbents (55 gal drums)
- sorbent dam
- 55-gallon recovery drums
- 85 gallon overpack drums
- Portland cement (pallet)
- bung wrench to remove 55 gal drum plugs (2)
- shovels (6 min)
- rakes (6 min)
- decontamination equipment personnel and
areas
wash basins
soap
scrub brushes
plastic sheeting
trash bags

Communications Equipment

- public address or paging system
all buildings
- telephones
all buildings
- hand-held radios (as needed)
- fire-pull stations (to be determined)

This submittal supersedes all previous information

Personal Protective Equipment-All buildings except administration and landfill emergency station (Continued)

- splash shields
- hard hats
- various type of gloves
- goggles
- safety glasses

Safety Equipment-All buildings except administration and landfill emergency station

- eyewashes
- safety showers
- first aid kit

Alarm Systems-All alarms will be indicated in guard shack and have local audible alarms

- onsite fire bell system
buildings
landfill area
- treatment or tank alarms
- spill alarms
accident or emergency alarm (non-fire alarm)

Truck Equipment

- 10 lbs. dry chemical fire extinguisher
- chock block
- spare tire/jack/wrench
- emergency triangle
- flashlight
- first aid kit
- towing strap

This submittal supersedes all previous information