

Attachment C

Contingency Plan

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ATTACHMENT C

CONTINGENCY PLAN

1 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. If any of these unplanned events occur, the procedures in this Contingency Plan will be immediately implemented.

This Contingency Plan was specifically developed for the Triassic Park Waste Disposal Facility (Facility). A final Contingency Plan will be provided to the New Mexico Environment Department (NMED) and other response agencies a minimum of 60 days prior to initiation of operations. The plan shall be kept at the Facility, and controlled copies, including all updates to the plan, shall be submitted to 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 Permit Attachment C3, Cooperating Local Authorities. Initial site tours with all local emergency response organizations will be conducted to familiarize them with the facility prior to the start of Facility operations.

The plan specifies the 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 (1) a 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 Emergency Coordinator (EC).

1.1 General Responsibilities of the Emergency Coordinator

The Facility shall train a minimum of five employees to serve as the EC for the Facility. Only one individual at a time shall be designated as the primary (on-duty or on-call) EC. The others will be specified as alternate ECs. An updated list of personnel qualified as ECs (see Permit Attachment C2, Emergency Coordinators) shall be provided to the NMED prior to waste receipt. Individuals shall be listed by name, address, and telephone number. The list also shall indicate the order in which each will assume responsibility as EC. In accordance with 40 CFR § 264.52(d), which states, “[f]or 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 shall be provided to the NMED Hazardous Waste Bureau prior to receipt of waste and shall be kept current both at the Facility and with local emergency response organizations.

An acting EC will be either physically present at the Facility or on call 24 hours a day, 365 days a year. Each EC will have authority to commit resources necessary to carry out the provisions of the Contingency Plan. The EC shall 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. All ECs shall 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 shall 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 shall assume the role of EC until an alternate EC is notified and arrives on the scene.

1.2 Circumstances Dictating Implementation of the Plan

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

- i. a fire or explosion occurs resulting in the release of a hazardous waste or involving an active hazardous waste management unit;
- ii. 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;
- iii. 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
- iv. a hazardous waste incident occurs resulting in an injury requiring more than basic first aid.

The plan shall 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 shall 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 Contingency Plan.

1.3 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, if necessary, initial treatment of released hazardous waste.

1.3.1 Discovery of Incident and Request for Assistance from Emergency Response Personnel

The individual who first discovers an incident or emergency shall 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.

1.3.1.a Life-Threatening Situations

All Facility employees shall be instructed and trained on response to a life-threatening situation or life-threatening release of materials. Employees shall 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 shall 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 shall be trained for initial response to on-site fires. When the alarm is activated, on-site personnel may use fire extinguishers or the application of soil and/or water to

suppress fires, but only as appropriate for the type of fire, if known. 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 shall be located at the administration building and the entrance to the landfill. Other possible locations of fire-pull stations may be established.

Automatic Fire Detection/Sprinkler System—All permanent Facility buildings shall 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.

Public Address (PA) or Paging System—Each of the main buildings shall 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 shall be used to communicate with personnel who are out of range of voice communications, PA, or are working in areas with noise levels that may render the PA system inaudible in emergency situations.

During non-operational hours, the EC shall be notified by pager, radio, cellular telephone, or regular telephone. The EC shall 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 shall contact the appropriate agencies or organizations. A list of these organizations is provided in Permit Attachment C3. During response activities, two-way radios shall be used for communication between responding groups and the EC.

1.3.1.b 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 shall 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.

1.3.2 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 shall immediately obtain the following information by process knowledge (his own or that of another employee): (1) observation; (2) review of Facility records, including safety data sheets (SDSs) 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 did or could move off-site. If it is determined that the release did or 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 must be labeled and tracked. 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 must 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 SDSs for raw materials used at the site shall 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. If the released substance cannot be identified, then the EC shall design and implement a sampling plan to characterize the released substance.

1.3.3 Assessment of Hazard

Concurrent with the waste identification and characterization phase of the emergency response, the EC shall 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 shall 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 runoff 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 Permit Attachment C3 or by utilizing various spill control reference textbooks and SDSs located in the EC's office.

1.3.4 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 either on-site or off-site human health and/or the environment, the findings shall be reported to appropriate response personnel as follows.

Local authorities shall be immediately notified, if an emergency incident at the Facility could affect local areas and if evacuation of these areas is necessary. The EC shall be available to assist appropriate officials in deciding whether local areas should be evacuated (evacuation procedures and a site-wide emergency evacuation plan are provided in Permit Attachment C4, Evacuation Plans) and Local authorities shall be provided 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 Permit Attachment C3. The agreements outline the conditions under which the agencies shall 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 shall be located in the EC's office and with each of the participating organizations. The agreements shall be considered controlled documents and shall 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 Permit Attachment C3, if additional assistance is needed at the site to protect community populations.

1.3.5 Response and Control Procedures

Following proper notification of agencies and/or evacuation of the Facility, the EC shall initiate response and control procedures. This effort will involve the use of emergency equipment, as necessary, which is listed in Permit Attachment C1, Emergency Equipment. 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 shall receive safety training to enable them to respond to and handle emergency situations that are not of a serious nature. In addition to this training, employees shall participate in emergency response drills on a periodic basis. These drills shall involve both internal responses and those response actions taken in conjunction with external emergency response personnel. Key personnel shall 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 shall be repaired. If repair is not possible, the equipment shall be replaced. The landfill unit shall 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 1.3.7.

1.3.5.a Fire and/or Explosion Control Procedure

If a fire or explosion occurs at the Facility that may impact the hazardous waste management unit or hazardous material storage area, the Contingency Plan shall be immediately implemented, as outlined in Section 1.3. The EC shall assess the situation and direct the emergency response effort. The EC shall 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 the Evacuation Plan in Attachment C4. A site-wide evacuation plan is presented in Drawing L-1 in the Evacuation Plan.

Facility employees shall 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 shall communicate this via the PA system and by other effective means, as necessary, and all employees will assemble at the administration building. If anyone is unaccounted for, emergency response personnel shall conduct searches.

After the affected areas have been evacuated, re-entry shall 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 shall 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 shall be managed as RCRA-regulated waste.

1.3.5.b Spills, Leaks, or Other Releases Control Procedure

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 shall 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 shall dial 911 for emergency assistance. In a life threatening situation personnel may call 911 without first notifying the EC. The EC shall then be notified of the employee's actions. Upon notification, the EC shall conduct a visual inspection of the release and shall implement immediate containment measures, as necessary.

1.3.5.b.1 Releases to the Environment

The EC shall implement, in addition to the applicable permit conditions of Permit Parts 6 and 7, the following procedures for responding to leaks or spills from units that may affect the environment:

- as previously stated, if uncontrolled releases of ignitable, corrosive, reactive, or toxic materials are involved in the incident, the affected area shall be evacuated;
- response personnel shall 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 may 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 shall immediately contact one of the emergency response organizations listed in Permit Attachment C3 for assistance;
- the EC shall 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 shall coordinate and instruct response personnel to begin cleanup and decontamination operations. These will involve containing and collecting any released material, contaminated sorbent materials, all visibly contaminated soils, and any other waste materials generated during cleanup or decontamination. These items shall 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) shall be pumped into drums. Representative samples of the liquids shall be collected and analyzed to determine the appropriate disposal pathway;
- if soils have come in contact with the spilled substance, the soils will be removed and sampling conducted to confirm that any residual concentrations of contamination in soils are less than the applicable cleanup levels specified in Permit Section 7.4;
- if surface (storm) water is present and has been affected, the water shall be contained and removed, to the extent possible. The water shall be containerized. Samples of the water shall be submitted to a laboratory for chemical analysis and properly disposed based on the results of the analyses.
- the EC shall use whatever means are necessary to determine if the released material is a hazardous substance as defined in 40 CFR § 302. If the amount is a reportable quantity, the following steps will be taken:
 - the EC shall report the release to NMED within 24 hours of detection;
 - the National Response Center shall 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 shall be filed with NMED within 5 days of detection, as described in Section 1.4.2 below 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 as defined by the lower amount specified in 40 CFR § 302.4 and the *Consolidated List of Chemicals Subject to the Emergency Planning and Community Right-To-Know Act, Comprehensive Environmental Response, Compensation and Liability Act and Section 112® of the Clean Air Act* (EPA 550-B-15-001, as updated), a Facility employee will be assigned to report on the situation and determine what, if any, follow-up actions are necessary after cleanup.

1.3.5.c Power or Equipment Failure Control Procedure

The Facility shall be equipped with one or more backup generators capable of providing sufficient emergency power generation to critical equipment. The generators shall also be capable of providing to power safety equipment, such as smoke detectors and tank emergency cut-off or bypass mechanisms. The as-built details of this system shall be submitted to NMED no less than 30 days prior to the acceptance of waste at the Facility. This emergency system shall be activated within 30 minutes of a power failure.

Equipment that fails, but does not result in an emergency incident such as a fire or explosion, shall be repaired or replaced within 24 hours or as soon as practicable. If emergencies arise as a result of the equipment failure, they shall be handled as described in previous sections.

1.3.6 Measures to Prevent Recurrence or Spread

During an emergency, the EC shall 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 shall 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 shall be maintained in the administration building as well as at specific operating locations;
- collecting and containing released waste as described in Section 1.3.5.b; and
- removing or isolating containers from the emergency at hand, as described in Section 1.3.5.a; 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 shall monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, as necessary.

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

1.3.7 Storage and Treatment of Released Hazardous Waste

Concurrently or immediately after the emergency has been addressed and cleanup procedures have been completed, the EC shall make arrangements for the containerization and storage, treatment, or disposal of any waste generated during the incident. The waste shall 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 shall be accomplished in accordance with

the Permit Attachment F, Waste Analysis Plan. The material shall be placed in DOT-approved containers and stored as RCRA-regulated waste until a determination is made. If the waste is determined to be RCRA-regulated, it shall be labeled and stored accordingly until it is 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 shall 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 shall not be disposed until cleanup activities are completed and the cleanup waste is safely containerized and segregated from the existing waste.

1.3.8 Equipment and Personnel Decontamination

A personnel decontamination zone (PDZ) shall be set up a safe distance away from the material release area by a team designated by the EC. The PDZ's location relative to the release area shall be determined by the EC. The PDZ shall be comprised of a support zone, contamination reduction zone, and exclusion zone.

The PDZ will be set up to sequentially decontaminate equipment and personnel. The first level of decontamination will involve decontamination of equipment or personnel containing the highest level of contamination. The decontamination procedure within the PDZ will generally comprise progressing through the contamination reduction zone and corridor followed by redress of personnel. The Contamination Reduction Corridor shall be designed to control access into and out of the exclusion zone and shall confine responding personnel to a limited area.

Also included in the Contamination Reduction Corridor shall be the decontamination of monitoring devices and waste sample containers. Non-reusable items such as latex gloves, Tyvek suits and duct tape, and respirators shall be properly collected and disposed of at an approved facility. Decontamination efforts regarding personnel shall be recorded including personnel identification, emergency response function, and date and time of day entering and leaving the PDZ. The PDZ shall be decontaminated, as necessary, and decommissioned when the emergency has been addressed and cleanup measures have been completed.

Sampling equipment including waste sample collection hardware, personal protective equipment, and monitoring devices shall be decontaminated in the Contamination Reduction Corridor prior to returning these items to their respective storage locations at the Facility. Decontamination shall involve scrubbing each item with a biodegradable detergent or other solution appropriate for the known or suspected contaminants followed by thorough rinsing with deionized water. This process shall be repeated at least one time. Additional scrubbing/rinsing shall be performed depending on the extent of contamination. Disposable personal protective equipment shall be containerized for disposal in the landfill. The PDZ supervisor shall conduct all recordkeeping with regard to decontamination efforts and shall note equipment, waste sample containers, and

monitoring devices that were decontaminated. The PDZ supervisor shall also note the number of detergent scrubbing/rinsing steps that were conducted. The PDZ supervisor shall verify that all equipment, sample containers, and monitoring devices have been properly decontaminated prior to these items being returned to their respective storage areas for reuse. All wastewater that was generated and collected during operation of the PDZ and disposable equipment shall be properly treated and/or disposed of as directed by the EC.

1.4 Post-Implementation Procedures

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

1.4.1 Post-Emergency Equipment Maintenance

All emergency equipment listed in Permit Attachment C1 shall be cleaned, repaired, or replaced so that it is fit for use before plant operations in the affected area are resumed. If the equipment cannot be adequately cleaned, it shall be disposed of as hazardous waste. If it cannot be repaired but is not contaminated, it will be disposed of as non-hazardous waste.

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

1.4.2 Required Reports and Notification

During and after certain emergency situations, as described in previous sections of this plan, specific types of reports or notification are 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 referenced in the appropriate sections of the Contingency Plan and also are described below.

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 shall 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 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 shall 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(i), within 15 days of the incident, the EC must submit to the NMED 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: (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 ; (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 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 of until cleanup procedures are completed, and all equipment must be cleaned and fit for its intended use prior to resuming operations.

1.5 Documents to be Maintained On-Site as Part of the Permit

Following the resolution of emergencies, various documents must be prepared and maintained on-site 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 shall be maintained in the administration building and at each location for which evacuation plans will be prepared. These documents shall 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, shall 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 shall be provided with a description and location map.

A list of authorized ECs and their home telephone numbers shall 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 shall be maintained in the administration building and in all controlled copies of the Contingency Plan. This list shall include the role of each emergency response authority in an emergency.

Coordinating Agreements shall be put in place with local, state, and federal agencies for responding to emergency incidents that may occur at the Facility. The Facility shall formalize Coordinating Agreements with those organizations listed in Permit Attachment C3 no later than 60 days prior to receipt of first waste.

A current evacuation plan shall be maintained in the EC's office. Permit Attachment C4 provides a general Evacuation Plan for the Facility. The Facility shall finalize this Evacuation Plan with details of building-specific evacuations after the Facility design has received final approval from NMED. The Facility shall submit the criteria for determining when site evacuations are necessary within 30 days of the effective date of the permit. Final evacuation plans and procedures shall be submitted within 60 days following final NMED approval of the Facility design.

A current version of the emergency and spill response equipment list presented in Permit Attachment C1 shall be maintained in the EC's office and in each of the controlled copies of the Contingency Plan.

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

1.6 Amendment of Contingency Plan

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

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

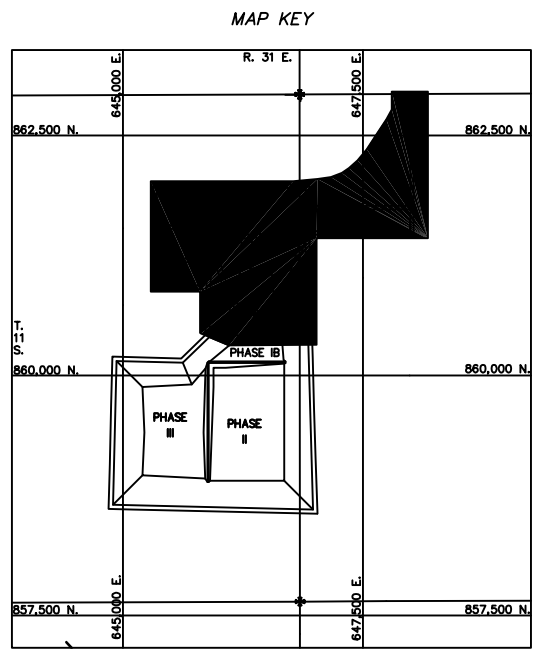
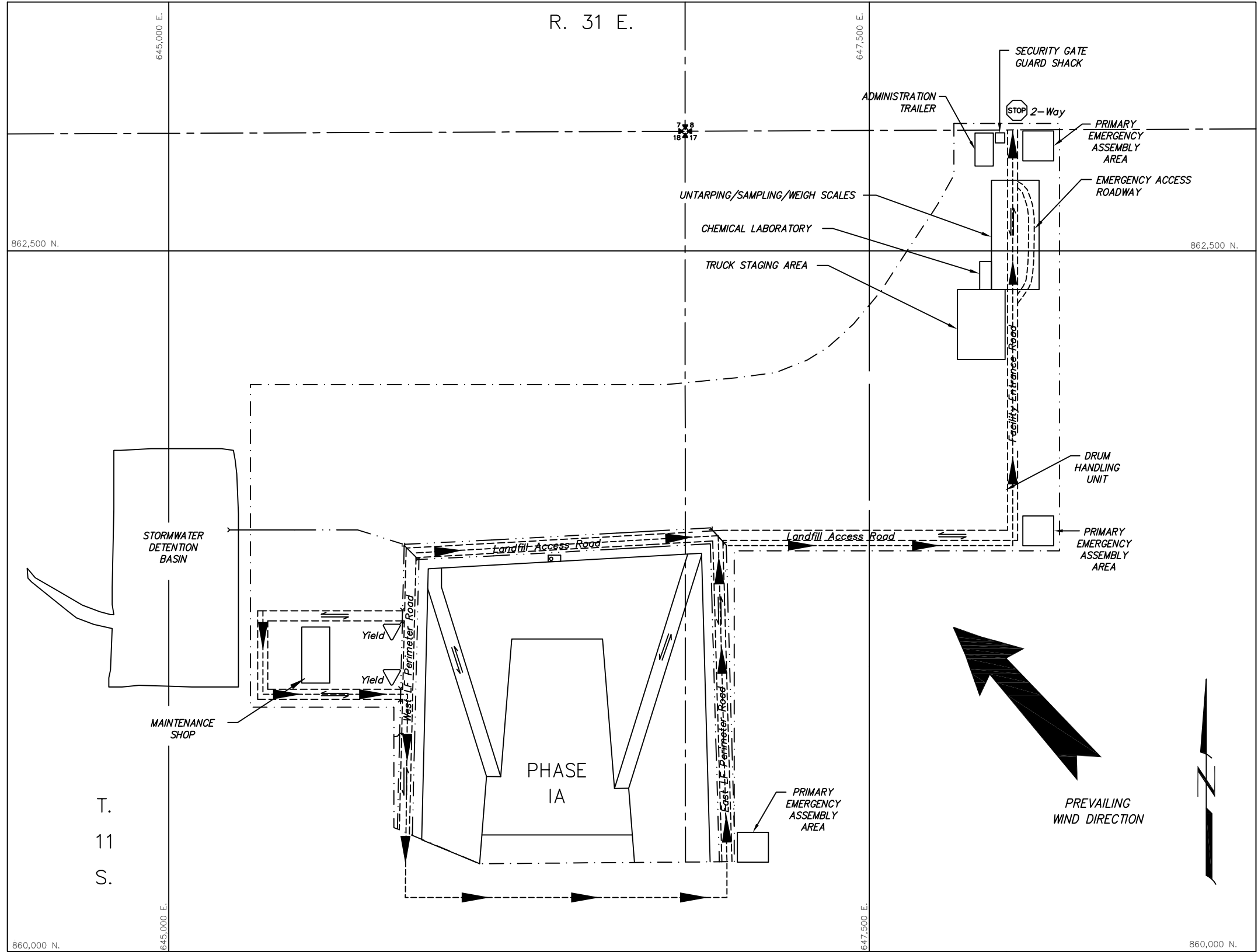
The Contingency Plan itself shall be reviewed by the EC and/or the Facility owner and immediately amended, if necessary, whenever any of the following events occur:

- the Facility permit is revised;

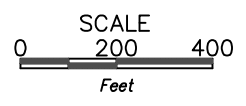
- the plan fails in an emergency;
- changes occur to the Facility design, construction, operation, maintenance, or other circumstance that materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or that change the response necessary in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

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

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NOTES:
 1. FOR GENERAL NOTES AND LEGEND INFORMATION SEE DRAWING No. 2, "INDEX, LEGEND AND GENERAL NOTES". 2. UNIMPROVED ROADS AND CONSTRUCTION HAUL ROADS NOT SHOWN. GRAVEL LINED ACCESS ROADS ARE 2 WAY TRAFFIC. ALL SITE ACCESS ROADS SPEED LIMIT IS 15 MPH, CONSTRUCTION HAUL ROAD SPEED LIMIT IS 35 MPH.



NO	DATE	BY	REVISION MADE
0	10/18/11	GDP	PART B PERMIT APPLICATION RENEWAL

FILE NAME: ES11.0141_TRIASSIC_PARK_PERMIT_RENEWAL\VR_DRAWINGS\TITLEBLOCK\TB_22634

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DESIGNED BY:	TO:
DRAWN BY:	KUB
CHECKED BY:	GDP
DATE:	7/02/2013

TRIASSIC PARK WASTE DISPOSAL FACILITY
 CHAVEZ COUNTY, NEW MEXICO
EMERGENCY EVACUATION PLAN



JOB NO.
ES11.0141

DRAWING NO.
L-1

PRELIMINARY - NOT FOR CONSTRUCTION