Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303


Dear Mr. Kieling:

The purpose of this letter is to transmit the updated copy of the Waste Isolation Pilot Plant Resource Conservation and Recovery Act Contingency Plan, incorporating the updates to the Plan, in accordance with the Permit Part 2, Section 2.12.2. For your convenience a table summarizing the changes is enclosed.

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please contact Mr. Anthony Stone at (575) 234-7475.

Sincerely,

[Signature]
Dana Bryson, Acting Manager
Carlsbad Field Office

[Signature]
Philip J. Breidenbach, Project Manager
Nuclear Waste Partnership LLC

Enclosures (2)

cc: w/enclosures
K. Roberts, NMED
R. Maestas, NMED
C. Smith, NMED
S. Holmes, NMED
CBFO M&RC

*ED denotes electronic distribution
ATTACHMENT 1:

TABLE 1. SUMMARY OF CHANGES

FOR THE MARCH 2015

CONTINGENCY PLAN

(1 PAGE DOCUMENT)
### Table 1. Summary of Changes for the March 2015 Contingency Plan

<table>
<thead>
<tr>
<th>Affected Permit Section</th>
<th>Change Description</th>
<th>Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Attachment D, Section D-4a(1)</td>
<td>This modification to Permit Attachment D, Section D-4a(1) clarifies that the RCRA Emergency Coordinator may notify the Emergency Response Team (ERT) using pagers, the public announcement (PA) system, and/or communication devices (e.g., phone, pager, cellular phone). In addition, the RCRA Emergency Coordinator may instruct the Central Monitoring Room Operator (CMRO) to make a Public Address (PA) announcement and/or use other communication devices (e.g., telephone, pager, cellular phone) to notify the Mine Rescue Team (MRT) to assemble in the Mine Rescue Room when needed.</td>
<td>B.6.b</td>
</tr>
<tr>
<td>Attachment D, Section D-4d(10)</td>
<td>This modification changes a reference in Attachment D, Section D-4d(10) from “Permit Attachment 13” to “Permit Attachment G3.”</td>
<td>A.1</td>
</tr>
<tr>
<td>Attachment D, Table D-8 and Table D-9</td>
<td>This modification updates Attachment D, Table D-8, Hazardous Release Reporting, Federal and Table D-9, Hazardous Release Reporting, State of New Mexico with current contact information.</td>
<td>B.6.d</td>
</tr>
<tr>
<td>Attachment D, Sections D-4a(1) and D-4d</td>
<td>This modification to Permit Attachment D, Sections D-4a(1) and D-4d(3) will clarify language in the Permit regarding the designation of the Incident Commander in the RCRA Contingency Plan. This change will ensure that the duties of the RCRA Emergency Coordinator and the incident Commander are defined consistent with their training.</td>
<td>A.1</td>
</tr>
<tr>
<td>Attachment D, Table D-6</td>
<td>Add new emergency response equipment to address the new equipment added to Attachment D, Table D-6.</td>
<td>B.6.b</td>
</tr>
</tbody>
</table>
ATTACHMENT D

RCRA CONTINGENCY PLAN
# ATTACHMENT D

## RCRA CONTINGENCY PLAN

### TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>D-1</td>
<td>General Information</td>
<td>1</td>
</tr>
<tr>
<td>D-1a</td>
<td>Disposal Phase Overview</td>
<td>3</td>
</tr>
<tr>
<td>D-1b</td>
<td>Waste Description</td>
<td>4</td>
</tr>
<tr>
<td>D-1c</td>
<td>Containers</td>
<td>5</td>
</tr>
<tr>
<td>D-1d</td>
<td>Description of Containers</td>
<td>5</td>
</tr>
<tr>
<td>D-1e</td>
<td>Description of Surface Hazardous Waste Management Units</td>
<td>6</td>
</tr>
<tr>
<td>D-1e(1)</td>
<td>CH Bay Operations</td>
<td>6</td>
</tr>
<tr>
<td>D-1e(2)</td>
<td>RH Complex Operations</td>
<td>6</td>
</tr>
<tr>
<td>D-1e(3)</td>
<td>Parking Area Container Storage Unit (Parking Area Unit)</td>
<td>7</td>
</tr>
<tr>
<td>D-1f</td>
<td>Off-Normal Events</td>
<td>7</td>
</tr>
<tr>
<td>D-1g</td>
<td>Containment</td>
<td>7</td>
</tr>
<tr>
<td>D-2</td>
<td>Response Personnel</td>
<td>8</td>
</tr>
<tr>
<td>D-3</td>
<td>Implementation</td>
<td>10</td>
</tr>
<tr>
<td>D-4</td>
<td>Emergency Response Method</td>
<td>12</td>
</tr>
<tr>
<td>D-4a</td>
<td>Notification</td>
<td>13</td>
</tr>
<tr>
<td>D-4a(1)</td>
<td>Initial Emergency Response and Alerting the RCRA Emergency Coordinator</td>
<td>13</td>
</tr>
<tr>
<td>D-4a(2)</td>
<td>Communication of Emergency Conditions to Facility Employees</td>
<td>15</td>
</tr>
<tr>
<td>D-4a(3)</td>
<td>Notification of Local, State, and Federal Authorities</td>
<td>15</td>
</tr>
<tr>
<td>D-4a(4)</td>
<td>Notification of the General Public</td>
<td>17</td>
</tr>
<tr>
<td>D-4b</td>
<td>Identification of Hazardous Materials</td>
<td>17</td>
</tr>
<tr>
<td>D-4c</td>
<td>Assessment of the Nature and Extent of the Emergency</td>
<td>18</td>
</tr>
<tr>
<td>D-4d</td>
<td>Control, Containment, and Correction of the Emergency</td>
<td>19</td>
</tr>
<tr>
<td>D-4d(1)</td>
<td>All Emergencies</td>
<td>19</td>
</tr>
<tr>
<td>D-4d(2)</td>
<td>Fire</td>
<td>21</td>
</tr>
<tr>
<td>D-4d(3)</td>
<td>Explosion</td>
<td>23</td>
</tr>
<tr>
<td>D-4d(4)</td>
<td>Spills</td>
<td>24</td>
</tr>
<tr>
<td>D-4d(5)</td>
<td>Decontamination of Personnel</td>
<td>25</td>
</tr>
<tr>
<td>D-4d(6)</td>
<td>Control of Spills or Leaking or Punctured Containers of CH and RH TRU Mixed Waste</td>
<td>25</td>
</tr>
<tr>
<td>D-4d(7)</td>
<td>Natural Emergencies</td>
<td>28</td>
</tr>
<tr>
<td>D-4d(8)</td>
<td>Roof Fall</td>
<td>29</td>
</tr>
<tr>
<td>D-4d(9)</td>
<td>Structural Integrity Emergencies</td>
<td>32</td>
</tr>
<tr>
<td>D-4d(10)</td>
<td>Emergency Termination Procedures</td>
<td>32</td>
</tr>
<tr>
<td>D-4e</td>
<td>Prevention of Recurrence or Spread of Fires, Explosions, or Releases</td>
<td>34</td>
</tr>
<tr>
<td>D-4f</td>
<td>Management and Containment of Released Material and Waste</td>
<td>35</td>
</tr>
<tr>
<td>D-4g</td>
<td>Incompatible Waste</td>
<td>37</td>
</tr>
<tr>
<td>D-4h</td>
<td>Post-Emergency Facility and Equipment Maintenance and Reporting</td>
<td>37</td>
</tr>
<tr>
<td>D-4i</td>
<td>Container Spills and Leakage</td>
<td>38</td>
</tr>
<tr>
<td>D-4j</td>
<td>Tank Spills and Leakage</td>
<td>38</td>
</tr>
</tbody>
</table>
LIST OF TABLES

Table                  Title
Table D-1             Hazardous Substances in Large Enough Quantities to Constitute a Level II Incident
Table D-2             Resource Conservation and Recovery Act Emergency Coordinators
Table D-3             Planning Guide for Determining Incident Levels and Response
Table D-4             Physical Methods of Mitigation
Table D-5             Chemical Methods of Mitigation
Table D-6             Emergency Equipment Maintained at the Waste Isolation Pilot Plant
Table D-7             Types of Fire Suppression Systems by Location
Table D-8             Hazardous Release Reporting, Federal
Table D-9             Hazardous Release Reporting, State of New Mexico

LIST OF FIGURES

Figure                Title
Figure D-1            WIPP Surface Structures
Figure D-1a           Legend to Figure D-1
Figure D-2            Spatial View of the WIPP Facility
Figure D-3            WIPP Underground Facilities
Figure D-4            Direction and Control Under Emergency Conditions in Which the Plan Has Been Implemented
Figure D-4a           WIPP Facility Emergency Notifications
Figure D-5            Underground Emergency Equipment Locations and Underground Evacuation Routes
Figure D-6            Fire-Water Distribution System
Figure D-7            Underground Diesel Fuel-Station Area Fire-Protection System
Figure D-8            WIPP On-Site Assembly Areas and WIPP Staging Areas
Figure D-8a           RH Bay Evacuation Routes
Figure D-8b           RH Bay Hot Cell Evacuation Route
Figure D-8c           Evacuation Routes in the Waste Handling Building
Figure D-9            Designated Underground Assembly Areas
Figure D-10           Waste Handling Building Pre-Fire Survey (First Floor)
Figure D-10a          Waste Handling Building Pre-Fire Survey (First Floor - Fire Hydrant/Post Indicator Location)
Figure D-11           Waste Handling Building Pre-Fire Survey (Second Floor)
Figure D-11a          Waste Handling Building Pre-Fire Survey (Second Floor - Fire Hydrant/Post Indicator Location)
Figure D-12           WIPP Hazardous Materials Incident Report, Page 1 of 3

LIST OF DRAWINGS

Drawing               Title
41-F-087-014          Waste Handling Building 411 Fire Water Collection System Flow Diagram
ATTACHMENT D

RCRA CONTINGENCY PLAN

Introduction

The WIPP facility is owned and co-operated by the U.S. Department of Energy (DOE) and co-
operated by its designated Management and Operating Contractor (MOC) (Permit Section
1.5.3).

This Contingency Plan was prepared in accordance with the Resource Conservation and
Recovery Act (RCRA) requirements codified in 20.4.1.500 NMAC (incorporating 40 CFR
§264.50 to §264.56), "Contingency Plan and Emergency Procedures," and submitted in
compliance with 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(7)). The purpose of this
document is to define responsibilities, to describe coordination of activities, and to minimize
hazards to human health and the environment from fires, explosions, or any sudden or
nonsudden release of hazardous waste, or hazardous waste constituents to air, soil, or surface
water (20.4.1.500 NMAC (incorporating 40 CFR §264.51 [a])). This plan consists of descriptions
of processes and emergency responses specific to hazardous substances, contact-handled
(CH) and remote-handled (RH) transuranic (TRU) mixed waste and other hazardous waste
handled at the WIPP facility.

D-1 General Information

The WIPP facility is located 26 miles (mi) (42 kilometers [km]) east of Carlsbad, in Eddy County
in southeastern New Mexico, and includes an area of 10,240 acres (ac) (4,144 hectares [ha]).
The facility is located in an area of low-population density, with fewer than 30 permanent
residents living within a 10 mi (16 km) radius of the facility. The area surrounding the facility is
used primarily for grazing, potash mining, and mineral exploration. Resource development that
would affect WIPP facility operations or the long-term integrity of the facility is not allowed within
the 10,240 ac (4,144 ha) that have been set aside for the WIPP Project.

The WIPP facility is designed to receive containers of TRU waste, which will be transported to
the WIPP facility from the ten major and other minor DOE TRU mixed waste generator and/or
storage sites. The waste will be emplaced in the bedded salt of the Salado Formation,
2,150 feet (ft) (655 meters [m]) below ground surface.

As a geologic facility for the management of TRU mixed waste, the WIPP repository is regulated
as a "miscellaneous unit," as defined under 20.4.1.500 NMAC (incorporating 40 CFR §264.601
to §264.603). The areas at the WIPP facility subject to this permit include the surface container
storage areas in the Waste Handling Building (WHB) Container Storage Unit (WHB Unit) and
the Parking Area Container Storage Unit (Parking Area Unit), located south of the WHB, and
the areas below ground in which waste will be emplaced.

The WIPP facility includes other surface structures, shafts, and underground areas (Figures D-
1, D-2, and D-3). Surface structures other than the WHB, that support TRU mixed waste
management include:

Exhaust Filter Building - houses the filter banks to which the underground ventilation can
be diverted in the unlikely event of an underground release of radionuclides.

PERMIT ATTACHMENT D
Page D-1 of 95
Guard and Security Building - houses the facility security personnel and communications equipment necessary for them to perform their duties. Section D-4a specifies the duties of the security officers relative to contingency actions.

Safety and Emergency Services Building - houses the surface emergency response vehicles (fire truck, rescue truck, ambulance), Health Services (first aid), Emergency Operations Center, and the Dosimetry Laboratory. The Hazardous Material Response Trailer is staged at the WIPP facility in an area that is readily accessible to Emergency Services. Emergency Services is located in Building 452. Table D-6 describes emergency equipment and associated locations.

Support Building - houses the Central Monitoring Room (see section D-4a).

Transuranic Package Transporter-II (TRUPACT-II) Maintenance Facility - is located west of the CH bay. No TRU mixed waste management activities will occur in this facility.

Surface facilities used for storage of support equipment are identified in Table D-6.

Building 452, Safety and Emergency Services Facility, houses the emergency response vehicles, emergency equipment, the mine rescue room, mine rescue team equipment, and the Emergency Operations Center (EOC). The Hazardous Material Response Trailer is staged at the WIPP facility in an area readily accessible to Emergency Services. Emergency Services is located in Building 452.

The RCRA permit addresses TRU mixed waste management activities in the WHB Unit, the Parking Area Unit, and the disposal units. The provisions of this Contingency Plan apply to hazardous waste disposal units (HWDU) in the underground waste disposal panels, storage in the WHB Unit and the Parking Area Unit, the Waste Shaft, and supporting TRU mixed waste handling areas. The remainder of the facility will not manage TRU mixed waste. This Contingency Plan has also been designed in accordance with 20.4.1.300 NMAC (incorporating 40 CFR § 262.34(a)(4) - Standards for Generators of Hazardous Waste), and will be implemented whenever there is a fire, explosion, or release of hazardous waste which could threaten human health or the environment. Hazardous substances in the remainder of the facility are included as possible triggers of the Contingency Plan but are outside the scope of the regulations promulgated pursuant to RCRA. This allows WIPP to maintain one emergency response plan which is consistent with the National Response Teams Integrated Contingency Plan Guidance (Federal Register, Vol. 61, No. 109, June 5, 1996). Inclusion is based on their National Fire Protection Association (NFPA) ratings in addition to their storage quantities. The majority of hazardous substances on-site are not expected to trigger the Contingency Plan because they are present in the same form and concentration as the product packaged for distribution and use by the general public or are used in a laboratory under the direct supervision of a technically qualified individual. Superfund Amendments and Reauthorization Act (SARA) Title III excludes these from emergency planning reporting. The list of hazardous substances in large enough quantities to constitute a Level II incident (Section D-3) is provided in Table D-1. In addition to TRU mixed waste, these are the only hazardous substances currently on site which, if spilled, may be of sufficient impact to cause this Contingency Plan to be implemented. Magnesium Oxide (MgO) is stored on-site in large quantities. It is used as backfill in the waste emplacement rooms as a pH buffer. The pH buffer will limit the solubility of radionuclides after the underground rooms are filled and closed. MgO is not a hazardous
substance, a release of MgO will not create hazardous waste and poses no threat to human health or the environment, and is therefore not addressed in the Contingency Plan.

Wastes generated as a result of maintenance or response actions will be categorized into one of three groups and disposed of accordingly. These are: 1) nonhazardous wastes to be disposed of in an approved landfill, 2) hazardous nonradioactive wastes to be disposed of at an off-site RCRA permitted facility, and 3) TRU mixed waste to be disposed of in the underground HWDUs. Disposal of TRU mixed waste in the WIPP facility is subject to regulation under 20.4.1.500 NMAC. As required by 20.4.1.500 NMAC (incorporating 40 CFR §264.601), the Permittees will demonstrate that the environmental performance standards for a miscellaneous unit, which are applied to the HWDUs in the underground, will be met. In addition, the technical requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.170 to §264.178) are applied to the operation of the container storage units in the WHB Unit and in the Parking Area Unit south of the WHB. Liquid wastes that may be generated as a result of the fire fighting water or decontamination solutions will be managed as follows:

Non-Mixed - Hazardous waste liquids contaminated only with hazardous constituents will be placed into containers and managed in accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.34) requirements. The waste will be shipped to an approved off-site treatment, storage, or disposal facility.

Mixed - Liquids contaminated with TRU mixed waste (inside the WHB Unit) will be solidified as they are placed into containers with cement, Aquaset, or absorbent material in them. The solidified materials will be disposed of in the underground WIPP repository as derived waste.

This chapter of the permit application describes the HWDUs, the TRU mixed waste management facilities and operations, compliance with the environmental performance standards, and with the applicable technical requirements of 20.4.1.500 NMAC (incorporating 40 CFR §264.170 to §264.178 and §264.601, respectively). The configuration of the WIPP facility consists of completed structures; including all buildings and systems for the operation of the facility.

D-1a Disposal Phase Overview

The Disposal Phase will consist of receiving CH TRU mixed waste shipping containers, unloading and transporting the waste containers to the underground HWDUs, emplacing the waste in the underground HWDUs, and subsequently achieving closure of the underground HWDUs in compliance with applicable State and Federal regulations.

The TRU mixed waste that will be disposed at the WIPP facility results primarily from activities related to the reprocessing of plutonium-bearing reactor fuel and fabrication of plutonium-bearing weapons, as well as from research and development. This TRU mixed waste consists largely of such items as paper, cloth, and other organic material; laboratory glassware and utensils; tools; scrap metal; shielding; and solidified sludges from the treatment of wastewater. Much of this TRU mixed waste is also contaminated with substances that are defined as hazardous under 20.4.1.200 NMAC.
D-1b Waste Description

Waste destined for WIPP are, or were, produced as a byproduct of weapons production and have been identified in terms of waste streams based on the processes that produced them. Each waste stream identified by generators is assigned to a Waste Summary Category to facilitate RCRA waste characterization, and reflect the final waste forms acceptable for WIPP disposal.

These Waste Summary Categories are:

S3000—Homogeneous Solids

Solid process residues defined as solid materials, excluding soil, that do not meet the applicable regulatory criteria for classification as debris (20.4.1.800 NMAC (incorporating 40 CFR §268.2[g] and [h])). Included in solid process residues are inorganic process residues, inorganic sludges, salt waste, and pyrochemical salt waste. Other waste streams are included in this Waste Summary Category based on the specific waste stream types and final waste form. This category includes wastes that are at least 50 percent by volume solid process residues.

S4000—Soils/Gravel

This waste summary category includes waste streams that are at least 50 percent by volume soil. Soils are further categorized by the amount of debris included in the matrix.

S5000—Debris Wastes

This waste summary category includes waste that is at least 50 percent by volume materials that meet the criteria for classification as debris (20.4.1.800 NMAC (incorporating 40 CFR §268.2)). Debris is a material for which a specific treatment is not provided by 20.4.1.800 NMAC (incorporating 40 CFR §268 Subpart D), including process residuals such as smelter slag from the treatment of wastewater, sludges or emission residues.

Debris means solid material exceeding a 2.36 inch (60 millimeter) particle size that is intended for disposal and that is: 1) a manufactured object, 2) plant or animal matter, or 3) natural geologic material.

Included in the S5000 Waste Summary Category are metal debris, lead containing metal debris, inorganic nonmetal debris, asbestos debris, combustible debris, graphite debris, heterogeneous debris, and composite filters, as well as other minor waste streams. Particles smaller than 2.36 inches in size may be considered debris if the debris is a manufactured object and if it is not a particle of S3000 or S4000 material.

Examples of waste that might be included in the S5000 Waste Summary Category are asbestos-containing gloves, fire hoses, aprons, flooring tiles, pipe insulation, boiler jackets, and laboratory tabletops. Also included are combustible debris constructed of plastic, rubber, wood, paper, cloth, graphite, and biological materials. Examples of graphite waste that would be included are crucibles, graphite components, and pure graphite.
Wastes may be generated at the WIPP facility as a direct result of managing the TRU and TRU mixed wastes received from the off-site generators. Such generated waste may occur in either the WHB Unit or the Underground. For example, when TRU mixed wastes are received at the WHB Unit, the CH or RH Package shipping containers and the TRU mixed waste containers are checked for surface contamination. Under some circumstances, if contamination is detected, the shipping container and/or the TRU mixed waste containers will be decontaminated. In the underground, waste may be generated as a result of radiation control procedures used during monitoring activities. The waste generated from radiation control procedures will be assumed to be TRU and/or TRU mixed waste. Throughout the remainder of this plan, this waste is referred to as "derived waste." All such derived waste will be placed in the rooms in HWDUs along with the TRU mixed waste for disposal.

D-1c Containers

The waste containers that will be used at the WIPP facility qualify as "containers," in accordance with 20.4.1.101 NMAC (incorporating 40 CFR §260.10). That is, they are "portable devices in which a material is stored, transported, treated, disposed of, or otherwise handled."

TRU mixed waste containers, containing off-site waste, will not be opened at the WIPP facility. Derived waste containers are kept closed at all times unless waste is being added or removed.

Waste, including "derived waste," containing liquid in excess of TSDF-WAC limits shall not be emplaced in the WIPP (See Permit Attachment C, Section C-1c).

Special requirements for ignitable, reactive, and incompatible waste are addressed in 20.4.1.500 NMAC (incorporating 40 CFR §§264.176 and 177). The RCRA Permit Treatment, Storage, and Disposal Facility Waste Acceptance Criteria (TSDF-WAC) precludes ignitable, reactive, or incompatible TRU mixed waste from being placed into storage or disposed of at WIPP.

D-1d Description of Containers

CH TRU mixed waste containers will be either 55-gallon (gal) (208-liter (L)) drums singly or arranged into seven (7)-packs, 85-gal (322-L) drums (used as singly or arranged into four (4)-packs, 100-gal (379 L) drums singly or arranged into three (3)-packs, ten-drum overpacks (TDOP), 66.3 ft³ (1.88 m³) SWBs, or standard large box 2s (SLB2).

RH TRU mixed waste containers are either canisters or drums. Canisters will be loaded singly in an RH-TRU 72-B cask and drums will be loaded in a CNS 10-160B cask. Drums in the CNS 10-160B cask will be arranged singly or in drum carriage units containing up to five drums each. Canisters and drums are described in Permit Attachment M1.

Remote-Handled TRU mixed waste may arrive in shielded containers with an internal capacity of 4.0 ft³ (0.11 m³). Shielded containers will be arranged as three-packs.

1 Typically contamination that is less than six square feet in area and less than 2000 disintegrations per minute (dpm) alpha or 20,000 dpm beta/gamma, may be decontaminated. Containers that exceed these thresholds will be returned to the point of origin for decontamination.
D-1e  Description of Surface Hazardous Waste Management Units

The WHB is the surface facility where waste handling activities will take place. The WHB has a total area of approximately 84,000 square feet (ft²) (7,804 square meters [m²]) of which 49,710 ft² (4,618 m²) are designated as the WHB Unit for TRU mixed waste management. Within the WHB Unit, 32,307 ft² (3,001 m²) are designated for the waste handling and container storage of CH TRU mixed waste and 17,403 ft² (1,617 m²) are designated for the handling and storage of RH TRU mixed waste. These areas are being permitted as container storage units. The concrete floors within the WHB Unit are sealed with an impermeable coating that has excellent resistance to the chemicals in TRU mixed waste and, consequently, provide secondary containment for TRU mixed waste. In addition, a Parking Area Unit south of the WHB will be used for storage of waste in sealed shipping containers awaiting unloading. This area is also being permitted as a container storage unit. The sealed shipping containers provide secondary containment in this hazardous waste management unit (HWMU).

D-1e(1)  CH Bay Operations

Once unloaded from the Contact-Handled Package, CH TRU mixed waste containers (3-pack of shielded containers, 7-packs of 55-gal drums, 3-packs of 100-gal drums, 4-packs of 85-gal drums, SWBs, TDOPs, or one SLB2) are placed on the facility pallet. The waste containers are stacked on the facility pallets (one- or two-high, depending on weight considerations). The use of facility pallets will elevate the waste at least 6 inches (in.) (15 centimeters [cm]) from the floor surface. Pallets of waste will then be stored in the CH bay. This storage area will be clearly marked to indicate the lateral limits of the storage area. This storage area will have a maximum capacity of thirteen facility pallets of waste during normal operations. These pallets will typically be in the CH Bay storage area for a period of up to five days.

In addition, four Contact-Handled Packages, containing up to 640 ft³ of CH TRU waste in containers, may occupy positions at the TRUPACT-II Unloading Docks (TRUDOCK).

Aisle space shall be maintained in all CH Bay waste storage areas. The aisle space shall be adequate to allow unobstructed movement of fire response personnel, spill-control equipment, and decontamination equipment that would be used in the event of an off-normal event. An aisle space between facility and containment pallets will be maintained in all CH TRU mixed waste storage areas.

D-1e(2)  RH Complex Operations

Loaded RH TRU casks are received in the RH Bay of the WHB. The RH Bay is served by an overhead bridge crane used for cask handling and maintenance operations. Storage in the RH Bay occurs in the RH-TRU 72-B or CNS 10-160B casks. A maximum of two loaded casks may be stored in the RH Bay and a maximum of one cask in the Cask Unloading Room may be stored at one time. A minimum of 44 inches (1.1 m) will be maintained between loaded casks in the RH Bay. The cask serves as secondary containment in the RH Bay for the RH TRU mixed waste payload container. In addition, the RH Bay has a concrete floor.

Single RH TRU mixed waste canisters are unloaded from the RH-TRU 72-B casks in the Transfer Cell of the RH Complex where they are transferred to facility casks. Drums of RH TRU mixed waste will be transferred remotely from the CNS 10-160B cask, into the Hot Cell, and loaded into a canister. Storage in the Hot Cell occurs in either drums or canisters. A maximum
of 12 55-gallon drums of RH TRU mixed waste and one 55-gallon drum of derived waste (94.9 ft³ (2.7 m³)) may be stored in the Hot Cell. Except for the derived waste drum, individual 55-gallon drums may not be stored in the Hot Cell for more than 25 days. The Transfer Cell houses the Transfer Cell Shuttle Car, which is used to facilitate transferring the canister to the facility cask. Storage in this area typically occurs at the end of a shift or in an off-normal event that results in the suspension of waste handling. A maximum of one canister (31.4 ft³ (0.89 m³)) may be stored in the Transfer Cell in a shielded insert in the Transfer Cell Shuttle Car or in a RH-TRU 72-B cask.

The Facility Cask Loading Room provides for transfer of a canister to the facility cask for subsequent transfer to the waste shaft conveyance and to the Underground Hazardous Waste Disposal Unit. The Facility Cask Loading Room also functions as an air lock between the waste shaft and the Transfer Cell. Storage in this area typically occurs at the end of a shift or in an off-normal event that results in the suspension of waste handling. A maximum of one canister (31.4 ft³ (0.89 m³)) may be stored in the Facility Cask in the Facility Cask Loading Room.

Derived waste will be stored in the RH Bay and in the Hot Cell.

D-1e(3) Parking Area Container Storage Unit (Parking Area Unit)

The area extending south from the WHB within the fenced enclosure identified as the Controlled Area on Figure A1-2 is defined as the Parking Area Container Storage Unit. This area provides storage for up to 6,734 ft³ (191 m³) of CH and/or RH TRU mixed waste contained in up to 40 loaded Contact-Handled Packages and 8 Remote-Handled Packages. Secondary containment and protection of the waste containers from standing rainwater are provided by the transportation containers. Up to 12 additional Contact-Handled Packages and four additional Remote-Handled Packages may be stored in the Parking Area Surge Area so long as the requirements of Permit Sections 3.1.2.3 and 3.1.2.4 are met. No more than 50 Contact-Handled and 12 Remote-Handled Packages may be stored in the Parking Area Storage Unit.

The safety criteria for Contact-Handled and Remote-Handled Packages require that they be opened and vented at a frequency of at least once every 60 days. During normal operations, Contact-Handled and Remote-Handled Packages will not require venting while located in the Parking Area Unit. Any off-normal event which results in the need to store a waste container in the Parking Area Unit for a period of time approaching fifty-nine (59) days shall be mitigated by returning the shipment to the generator prior to the expiration of the 60 day NRC venting period or by moving the Contact-Handled or Remote-Handled Package inside the WHB Unit where the waste will be removed and placed in one of the permitted storage areas or in the underground hazardous waste disposal unit.

D-1f Off-Normal Events

Off-normal events could interrupt normal operations in the waste management process line. Shipments of waste from the generator sites will be stopped in any event which results in an interruption to normal waste handling operations that exceeds three days.

D-1g Containment

The WHB Unit has concrete floors, which are sealed with a coating designed to resist all but the strongest oxidizing agents. Such oxidizing agents do not meet the TSDF-WAC and will not be
accepted in TRU mixed waste at the WIPP facility. Therefore, TRU mixed wastes pose no compatibility problems with respect to the WHB Unit floor.

During normal operations, the floor of the normal storage areas within the CH Bay and RH Complex shall be visually inspected on a weekly basis to verify that it is in good condition and free of obvious cracks and gaps. When a RH TRU mixed waste container is present in the RH Complex, inspections will be conducted visually and/or using closed-circuit television cameras in order to manage worker dose and minimize radiation exposures. Manual inspections of the areas are performed at least annually during routine maintenance periods when waste is not present.

Floor areas of the WHB used during off-normal events will be inspected prior to use and weekly while in use. Containers located in the permitted storage areas shall be elevated from the surface of the floor. Facility pallets provide at least 6 in. (15 centimeters [cm]) of elevation from the surface of the floor. TRU mixed waste containers that have been removed from Contact-Handled or Remote-Handled Packages shall be stored at a designated storage area inside the WHB so as to preclude exposure to the elements.

Secondary containment at permitted storage areas inside the WHB Unit shall be provided by the floor. The Parking Area Unit and TRU/DOCK storage area of the WHB Unit do not require engineered secondary containment, since waste is not stored there unless it is protected by the Contact-Handled or Remote-Handled Packaging. Floor drains, the fire suppression water collection sump, and portable dikes, if needed, will provide containment for liquids that may be generated by fire fighting. Sump capacities and locations are shown in Drawing 41-F-087-014. Residual fire fighting liquids will be placed in containers and managed as described above.

Secondary containment at storage locations inside the RH Bay, Cask Unloading Room, Transfer Cell, and Facility Cask Loading Room is provided by the cask or canisters that contain drums of RH TRU mixed waste. In the Hot Cell, secondary containment is provided by the Hot Cell subfloor. In addition, the RH Complex contains a 220-gallon (833-L) sump in the Hot Cell, a 11,400-gallon (43,152-L) sump in the RH Bay, and a 220-gallon (833-L) sump in the Transfer Cell to collect any liquids.

D-2 Response Personnel

Persons qualified to act as the RCRA Emergency Coordinator, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.55), are listed in Table D-2.

A RCRA Emergency Coordinator will be on-site at the WIPP facility 24 hours a day, seven days a week, with the responsibility for coordinating emergency response measures. RCRA Emergency Coordinators are listed in Table D-2, where four individuals have been designated primary RCRA Emergency Coordinators. This is because the on-duty Facility Shift Manager (FSM) is designated as the RCRA Emergency Coordinator. The four individuals shown serve as FSM on a rotating shift basis.

Persons qualified to act as the RCRA Emergency Coordinator are thoroughly familiar with this Contingency Plan, the TRU mixed waste and hazardous waste operations and activities at the WIPP facility, the locations of TRU mixed waste and hazardous waste activities, the locations on the site where hazardous materials are stored and used, and the locations of waste staging and accumulation areas. They are familiar with the characteristics of hazardous substances, TRU mixed waste and hazardous waste handled at the WIPP facility, the location of TRU mixed...
waste and hazardous waste records within the WIPP facility, and the facility layout. In addition, persons qualified to act as the RCRA Emergency Coordinator have the authority to commit the necessary resources to implement this Contingency Plan. Figure D-4 outlines the RCRA Emergency Coordinator's position relative to other organizations that provide support.

In addition to the RCRA Emergency Coordinator, the following individuals or groups have specified responsibilities during any WIPP facility emergency:

- **Assistant Chief Office Warden (ACOW)**—Persons assigned to take accountability for sections of the site, and then reporting the accountability to the Chief Office Warden.

- **Central Monitoring Room Operator (CMRO)**—The on-shift operator responsible for Central Monitoring Room (CMR) operations, including coordination of facility communications. The facility log is maintained by the CMRO.

- **Chief Office Warden (COW)**—A predesignated individual with responsibilities for complete surface accountability at staging areas in the event of an evacuation. The Chief Office Warden receives reports from the ACOWs.

- **Emergency Response Team (ERT)**—Supplemental group trained to respond to surface emergencies, to provide emergency first aid, and to respond to releases of hazardous waste or hazardous material. ERT members are part of the WIPP Supplemental Emergency Response Program.

- **Emergency Services Technician (EST)/Fire Protection Technician (FPT)**—Regular employee whose job is that of full-time emergency responder. During non-emergency conditions, the EST/FPT inspects facility fire suppression systems and emergency equipment. The EST/FPT completes specific sections of the “WIPP Hazardous Material Incident Report.” Additional technical personnel complete identified sections of the report.

- **Fire Brigade**—The fire brigade is a team of five personnel who respond to site emergencies. The team consists of an Incident Commander and four fire fighters. The fire fighters are trained in accordance with NFPA Standards for Industrial Fire Brigades (Fire Brigades that perform both advanced exterior and interior structural fire fighting).

- **First Line Initial Response Team (FLIRT)**—Supplemental primary responders in the event of a general underground emergency for medical and hazardous material response. The FLIRT also provides backup support for the ERT in the event of a general surface-facility emergency. FLIRT members are part of the WIPP Supplemental Emergency Response Program.

- **Mine Rescue Team (MRT)**—Supplemental group responsible for underground reentry and rescue after an emergency evacuation. The MRT responds in accordance with 30 CFR Part 49 requirements. MRT members are part of the WIPP Supplemental Emergency Response Program.

- **Office Warden**—An individual assigned responsibility for assuring that personnel are evacuated from his/her assigned area or building during evacuations. Office Wardens
maintain a list of all personnel in their specific area. This list is compared with the
current physical presence of personnel who assemble at the staging areas. The Office
Wardens report area accountability to the ACOWs.

- **EOC Staff**-The EOC consists of a minimum staff of three MOC management positions
  (the Crisis Manager, a Safety Representative and an Operations Representative) to
activate the EOC. The full EOC Staff includes the Crisis Manager, the Deputy Crisis
Manager, a Safety Representative, an Operations Representative and the EOC
Coordinator. Additional technical and logistics personnel will provide support as
necessary. The EOC is activated by the FSM. Since EOC staff are performing duties
similar to their normal job functions and providing support related to their area of
expertise, no specific RCRA training is required.

**D-3 Implementation**

The provisions of this Contingency Plan will be implemented immediately whenever there is an
emergency event (e.g., a fire, an explosion, or a natural occurrence that involves or threatens
hazardous or TRU mixed wastes or a release of hazardous substances, hazardous materials, or
hazardous wastes) that could threaten human health or the environment, or whenever the
potential for such an event exists as determined by the RCRA Emergency Coordinator, as
required under 20.4.1.500 NMAC (incorporating 40 CFR §264.51(b)). The following information
is utilized for categorization of events to determine implementation of the Contingency Plan:

1. Medical Emergencies (does not implement the Contingency Plan)

2. Non-emergency (does not implement the Contingency Plan)
   a. Fire already out, did not involve any hazardous materials.
   b. Spill or release involved materials excluded according to the SARA Title III,
      Statute 42 U.S.C. 11021 (e). Such as:
      1) Any substance present in the same form and concentration as product
         packaged for distribution and use by the general public. (Example: Cleaning
         solutions)
      2) Any substance to the extent it is used in a laboratory under the direct
         supervision of a technically qualified individual.
      3) Petroleum, including crude oil or any fraction thereof, which is not otherwise
         specifically listed or designated as a hazardous substance by Comprehensive
         Environmental Response, Compensation and Liability Act (CERCLA).
3. Incident Level I: According to the NFPA 471, Responding to Hazardous Materials Incidents (See Table D-3). If the product(s) involved in the fire, explosion, spill or leakage meets the following criteria, it will be classified as a Level I incident and does not implement the Contingency Plan.

a. The product does not require a U.S. Department of Transportation (DOT) placard, is a NFPA listed 0 or 1 for all categories, or is Other Regulated Materials A, B, C, or D.

b. The fire is under control and the reactivity rating of the material is less than a rating 2, indicating a low potential for subsequent explosion as the hazardous material can be considered normally stable.

c. There was no release or the release can be confined with readily available resources.

d. There is no life-threatening situation.

e. There is no potential environmental impact.

4. Incident Level II: According to NFPA 471, Responding to Hazardous Materials Incidents, (See Table D-3). If the product(s) involved in the fire, explosion, spill or leakage meets the following criteria, it will be classified as a Level II incident and the Contingency Plan will be implemented by the RCRA Emergency Coordinator.

a. The product requires a DOT placard, is an NFPA 2 for any categories, or is Environmental Protection Agency (EPA) regulated waste (Site-specific: Table D-1 and TRU mixed waste) AND

b. The incident involves multiple packages.

c. There is potential for the fire to spread since the hazardous material’s flammability level (rating 2) is below 200 degrees Fahrenheit, or the reactivity (rating 2) indicates that violent chemical changes are possible and thus may be explosive.

d. The release may not be controllable without special resources.

e. The incident requires evacuation of a limited area for life safety.

f. The potential for environmental impact is limited to soil and air within incident boundaries.

g. The container is damaged but able to contain the contents to allow handling or transfer of product.
5. Incident Level III: According to NFPA 471, Responding to Hazardous Materials

   Incidents (See Table D–3). If the product(s) involved in the fire, explosion, spill or
   leakage meet the following criteria, it will be classified as a Level III incident and the
   Contingency Plan will be implemented by the RCRA Emergency Coordinator.

   a. The product is a poison A (gas), an explosive A/B, organic peroxide, flammable
   solid, material that is dangerous when wet, chlorine, fluorine, anhydrous
   ammonia, NFPA 3 and 4 for any categories including special hazards, EPA
   extremely hazardous substances, and cryogenics.

   b. The site-specific container size for this incident level will be a tank truck.

   c. There is potential for the fire to spread since the hazardous material's flammability
   level (rating 3 or 4) is below 100 degrees Fahrenheit, or the reactivity (rating 3 or
   4) indicates that the material may explode.

   d. The release may not be controlled even with special resources.

   e. The incident requires mass evacuation of a large area for life safety.

   f. Even though the NFPA guidelines for this incident level indicate that the potential
   for environmental impact is severe, due to the site engineering controls, the
   impact is contained within the HWMUs.

   g. The container is damaged to such an extent that catastrophic rupture is possible.

The above categories include fire situations, weather conditions, natural phenomena, and
explosions which will have to be evaluated to make an incident level determination. A Level II
(potential threat to human health in localized area, potential for moderate on-site environmental
impact) or Level III (potential threat to human health in a larger area, potential for severe
environmental impact) incident by definition is considered to be a potential threat to human
health or the environment and, therefore, is considered to be an emergency requiring activation
of the Contingency Plan.

D-4. Emergency Response Method

Methods that describe how and when the WIPP Contingency Plan will be implemented cover
the following 11 implementation areas:

1. Notification (Section D-4a)
2. Identification of hazardous materials (Section D-4b)
3. Assessment of the nature and extent of the emergency (Section D-4c)
4. Control, containment, and correction of the emergency (Section D-4d)
5. Prevention of recurrence or spread of fires, explosions, or releases (Section D-4e)
6. Management and containment of released material and waste (Section D-4f)
7. Incompatible waste (Section D-4g)
8. Post-emergency facility and equipment maintenance and reporting (Section D-4h)
9. Container spills and leakage (Section D-4i)
10. Tank spills and leakage (Section D-4j)
11. Surface impoundment spills and leakage (Section D-4k)
D-4a Notification

Notification requirements in the event of an emergency at a RCRA hazardous waste management facility are defined by 20.4.1.500 NMAC (incorporating 40 CFR §§264.56(a) and (d)). Necessary notifications in case of an emergency at the WIPP facility are described in this section (Figure D-4a). Personnel at the WIPP facility are trained to respond to emergency notifications.

D-4a(1) Initial Emergency Response and Alerting the RCRA Emergency Coordinator

The first person to become aware of an incident shall immediately report the situation to the CMRO, and provide the following information, as appropriate:

- Name and telephone number of the caller
- Location of the incident and the caller
- Time and type of incident
- Severity of the incident
- Magnitude of the incident
- Cause of the incident
- Assistance needed to deal with or control the incident
- Areas or personnel affected by the incident

In addition to receiving incident reports, the CMRO continuously monitors (24 hours a day) the status of mechanical, electrical, and/or radiological conditions at selected points on the site, both above and below ground. Alarms to indicate abnormal conditions are located throughout the WIPP facility. The alarm(s) (e.g., fire, radiation) may be the first notification of an emergency situation received by the CMRO. The CMRO monitors alarms, takes telephone calls and radio messages, and initiates outgoing calls to emergency staff and outside agencies.

Once the CMRO is notified of a fire, explosion, or a release anywhere in the facility (either by eyewitness or an alarm), the RCRA Emergency Coordinator is immediately notified. Once notified, the RCRA Emergency Coordinator assumes responsibility for the management of activities related to the assessment, abatement, and/or cleanup of the incident.

A RCRA Emergency Coordinator is on-site at all times and, therefore, can be reached at any time via a two-way radio or over the public address (PA) and pagers on-site. If the RCRA Emergency Coordinator is unavailable or unable to perform these duties, a qualified alternate RCRA Emergency Coordinator is available.

The EST/FPT is also notified in case of fire, explosion, or release. The RCRA Emergency Coordinator determines if supplemental emergency responders are necessary. Notification of the ERT (surface) is made by using the ERT pagers and/or the public announcement system and/or other equivalent communication devices (e.g., phone, pager, cellular phone). Notification of the FLIRT is by using the Mine Page Phone System. If the MRT is needed the RCRA Emergency Coordinator will instruct the CMRO to use the PA system or other communication devices (e.g., phone, pager, cellular phone) to make an announcement for the MRT to assemble in the Mine Rescue Room, located in a predetermined location.
Off-shift personnel may be notified using the on-call list, which is updated weekly by the Permittees. The FSM/CMRO, each individual on the on-call list, and WIPP Security receive copies of the on-call list. The CMRO may direct Security to make the notifications.

The response to an unplanned event will be performed in accordance with procedures based on the applicable Federal, State, or local regulations and/or guidelines for that response. These include the U.S. Mine Safety and Health Administration (MSHA); NMAC; CERCLA; Chapter 74, Article 4B, New Mexico Statutes Annotated 1978, New Mexico Emergency Management Act; and agreements between the Permittees and local authorities (Section D-6) for emergencies throughout the WIPP facility.

After notification by the CMRO, the EST/FPT shall immediately investigate to determine pertinent information relevant to the actual or potential threat posed to human health or the environment. The information will include the location of release, type, and quantity of spilled or released material (or potential for release due to fire, explosion, weather conditions, or other naturally occurring phenomena), source, areal extent, and date and time of release. The EST/FPT shall provide information for classification of the incident, according to the emergency response guidelines, to the RCRA Emergency Coordinator. The RCRA Emergency Coordinator then classifies the incident after evaluation of all pertinent information. This classification will consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects 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 fire and heat-induced explosions).

When the RCRA Emergency Coordinator determines that an Incident Level II or III has occurred, the Contingency Plan is implemented. The RCRA Emergency Coordinator then may choose to activate the EOC for additional support (Figure D-4). If the RCRA Emergency Coordinator determines that due to extenuating circumstances the potential to upgrade to an incident Level II or III exists, the RCRA Emergency Coordinator also may activate the EOC. The EOC will assist the RCRA Emergency Coordinator in mitigation of the incident with use of communications equipment and technical expertise from any WIPP organization (see Section D-4c).

The EOC staff will assess opportunities for coordination and the use of mutual-aid agreements with local outside agencies making additional emergency personnel and equipment available (Section D-6), as well as the use of specialized response teams available through various State and Federal agencies. As a DOE-owned facility, the WIPP facility may use the resources available from the Federal Response Plan, signed by 27 Federal departments and agencies in April 1987, and developed under the authorities of the Earthquake Hazards Reduction Act of 1977 (42 U.S.C. 7701 et seq.) and amended by the Stafford Disaster Relief Act of 1988. Most resources are available within 24 hours. The WIPP facility maintains its own emergency response capabilities on-site. In addition to the supplemental emergency responders, radiological control technicians, environmental sampling technicians, wildlife biologists, and various other technical experts are available for use on an as-needed basis.
D-4a(2) Communication of Emergency Conditions to Facility Employees

Procedures for notifying facility personnel of emergencies depend upon the type of emergency. Methods of notification are:

- Local Fire Alarms

  The local fire alarms sound a bell tone and may be activated automatically or manually in the event of a fire.

- Surface Evacuation Signal

  The evacuation signal is a yelp tone and is manually activated by the CMRO when needed. The CMRO shall follow the evacuation signal with verbal instructions and ensure the Site Notification System (i.e., the plectron) has been activated.

- Underground Evacuation Warning System

  The evacuation signal is a yelp tone and flashing strobe light. In the event of an evacuation signal, underground personnel will proceed to the nearest egress hoist station (Section D-7b) to be apprised of the nature of the emergency and the evacuation route to take. Underground personnel are trained to report to the underground assembly areas and await further instruction if all power fails or if ventilation stops. If evacuation of underground personnel is required, this will be done using the backup electric generators and in accordance with the applicable requirements of MSHA.

- Contingency Evacuation Notification

  If the primary warning system consisting of alarms and signals fails to operate when activated (as in a total power outage and failure of the back-up power systems), WIPP Security will be notified by the CMRO to initiate the contingency evacuation plan. In this event Security officers will alert personnel to evacuate the area and will check trailers, if possible, to ensure that personnel have been alerted/evacuated.

WIPP facility personnel are trained and given instruction during General Employee Training to recognize the various alarm signals and the significance of each alarm. WIPP facility employees and site visitors are required to comply with directions from emergency personnel and alarm system notifications and to follow instructions concerning emergency equipment, shutdown procedures, and emergency evacuation routes and exits.

D-4a(3) Notification of Local, State, and Federal Authorities

If it is determined that the facility has had a fire, an explosion, a spill, or a release of hazardous waste or hazardous waste constituents (included in 20.4.1.200 NMAC (incorporating 40 CFR § 261)) in the miscellaneous unit or TRU mixed waste handling areas, or an emergency resulting in a release of a hazardous substance (included in 40 CFR §302.4 and §302.6 or the New

---

2 The yelp tone increases from 500 to 1,000 hertz and drops to 500 hertz.
Mexico Emergency Management Act, §74-4B-3 and §74-4B-5) that could threaten human health or the environment outside the facility, the RCRA Emergency Coordinator, after consultation with the DOE as the owner of the facility, will assure that local authorities are notified by telephone and/or radio, including:

- Carlsbad Police Department (telephone number: [575] 885-2111) (or 911)
- Carlsbad Fire Department (telephone number: [575] 885-2111) (or 911)
- Eddy County Sheriff (telephone number: [575] 887-7551)
- Hobbs Fire Department (telephone number: [575] 397-9265)

After local authorities are notified, the RCRA Emergency Coordinator will ensure notification of the following:

- New Mexico Environment Department (NMED)
  Department of Public Safety
  24-Hour Emergency Reporting Telephone Number: (505) 827-9329
  FAX number: (505) 827-9368

- Department of Public Safety WIPP Coordinator
  Telephone Number: (505) 827-9221
  FAX number: (505) 829-3434

- Hazardous Materials Emergency Response, Chemical Safety Office, Department of Public Safety, State Emergency Response Commission
  Telephone number: (505) 476-9681
  FAX number: (505) 476-9695

- National Response Center
  Telephone number: 1-800-424-8802
  FAX number: (202) 479-7181

- Local Emergency Planning Committee
  Telephone number: (575) 885-3581
  Fax number: (575) 628-3973

The first notification of public safety and regulatory agencies will include the following:

- The name and address of the facility and the name and phone number of the reporter
- The type of incident (fire, explosion, or release)
- The date and time of the incident
- The type and quantity of material(s) involved, to the extent known
- The exact location of the incident
- The source of the incident
• The extent of injuries, if any

• Possible hazards to human health and the environment (air, soil, water, wildlife, etc.) outside the facility

• The name, address, and telephone number of the party in charge of or responsible for the facility or activity associated with the incident

• The name and the phone number of the RCRA Emergency Coordinator

• The identity of any surface and/or groundwater involved or threatened and the extent of actual and potential water pollution

• The steps being taken or proposed to contain and clean up the material involved in the incident

The RCRA Emergency Coordinator will also be available to advise the appropriate local, State, or Federal officials on whether or not local areas should be evacuated.

D-4a(4) Notification of the General Public

Immediate notification of the general public through the public safety and emergency agencies listed above will be made by, or under the direction of, the RCRA Emergency Coordinator following an evaluation to determine if local adjacent areas need to be evacuated. This evaluation will be made in consultation with the DOE who, as the owner of the facility, has management responsibility for the land withdrawal area. DOE policy is to provide accurate and timely information to the public by the most expeditious means possible concerning emergency situations at the WIPP site that may affect off-site personnel, public health and safety, and/or the environment. A DOE (DOE) Management representative is always on-call. This person is available by pager or telephone 24 hours a day.

A Hazards Assessment was conducted, which indicated no need for protective actions or emergency action levels, as defined by the Permittees, for the facility. Therefore, no procedures are in place for evacuation of the public. Procedures are in place for notification of the public by radio, television, and newspapers for news items which might include notification of on-site emergency situations. These procedures include a Public Affairs Coordinator in the EOC who writes and transmits press releases to the DOE office, where formal press conferences are conducted.

D-4b Identification of Hazardous Materials

The identification of hazardous wastes, hazardous waste constituents, or hazardous materials involved in a fire, an explosion, or a release to the environment is a necessary part of the assessment of an incident, as described in 20.4.1.500 NMAC (incorporating 40 CFR §264.56(b)). RCRA hazardous waste and hazardous substances and materials listed in 40 CFR §302.4 and §302.6 or New Mexico Emergency Management Act, §74-4B-3 and §74-4B-5 and, involved in any release at the WIPP facility will be identified. The identification of likely hazardous materials at any location is enhanced because hazardous materials and hazardous waste are only stored or managed in specified locations throughout the WIPP facility. An attempt will be made to identify products involved by occupancy/location, container shape,
markings/color, placards/labels, United Nations/North America/Product Identification Number, on-site technical experts, or field sampling. Further, the ES&H department maintains an updated inventory of hazardous materials/substances that are brought on site, and a master MSDS listing in the Safety and Emergency Services Facility, Building 452.

Sources of information available to identify the hazardous wastes, substances, or materials involved in a fire, an explosion, or a release at the WIPP facility include operator/supervisor knowledge of their work areas, materials used, and work activities underway; the WIPP Waste Information System (WWIS), which identifies the location within the facility of emplaced TRU mixed waste, including emplaced derived waste; and waste manifests and other waste characterization information in the operating record. The WWIS also includes information on wastes that are in the waste handling process. Also available are MSDSs for hazardous material in the various user areas throughout the facility, waste acceptance records, and materials inventories for buildings and operating groups at the WIPP facility. Information or data from the derived waste accumulation areas, the hazardous waste staging area, satellite staging areas, and nonregulated waste accumulation areas are included.

TRU mixed waste received by the WIPP facility during the Disposal Phase will be characterized for hazardous constituents prior to receipt, and acceptable knowledge will be used to characterize derived waste prior to emplacement.

Information required for identifying TRU mixed hazardous constituents in case of an incident is readily available through the WWIS and the waste acceptance records. Waste accepted at WIPP is already known to be compatible with all materials used to respond to an emergency. All non-TRU mixed waste materials received on site, other than those listed in Table D-1, are in such small quantities that no reaction could develop which would trigger an Incident Level II or III response.

The RCRA Emergency Coordinator will have access to the WWIS through Operations, or through the Facility Shift Manager’s Office.

The RCRA Emergency Coordinator has access to the inventory lists and MSDSs in the Safety and Emergency Services Facility at all times.

D-4c  Assessment of the Nature and Extent of the Emergency

Once the required notifications have been made, the RCRA Emergency Coordinator will ensure that the identity, exact source, amount, and areal extent of any released materials are determined, as required under 20.4.1.500 NMAC (incorporating 40 CFR §264.56(b)). The RCRA Emergency Coordinator will determine whether the occurrence constitutes an emergency based on knowledge of the area and access to the waste identification/characterization information described in Section D-4b. An emergency will require response by only trained emergency response personnel. The RCRA Emergency Coordinator will be responsible for responding to immediate and potential hazards, using the services of trained personnel to determine: 1) the identity of hazardous wastes, hazardous waste constituents, and other hazardous materials involved in a release, as described in Section D-4b; 2) whether or not a release involved a reportable quantity of a hazardous substance; 3) the areal extent of a release; 4) the exact source of a release; and 5) the potential hazards to human health or to the environment.
After the materials involved in an emergency are identified, the specific information on the
associated hazards, appropriate personal protective equipment (PPE), decontamination, etc.,
will be obtained from MSDSs and from appropriate chemical reference materials at the same
location. These information sources may be accessed by the RCRA Emergency Coordinator or
through several WIPP facility organizations.

The emergency assessment requires determination of hazards involving evaluation of several
criteria, including:

- Exposure: magnitude of actual or potential exposure to employees, the general public,
  and the environment; duration of human and environmental exposure; pathways of
  exposure

- Toxicity: types of adverse health or environmental effects associated with exposures;
  the relationship between the magnitude of exposure and adverse effects

- Reactivity: hazardous materials or hazardous wastes, which are not TRU mixed
  wastes, involved in an incident will be assessed for reactivity through accessing the
  MSDSs for the affected material and the recommended method(s) for managing such
  waste

- Uncertainties: considerations for undeterminable or future exposures; uncertain or
  unknown health effects, including future health effects

D-4d Control, Containment, and Correction of the Emergency

The WIPP facility is required to control an emergency and to minimize the potential for the
occurrence, recurrence, or spread of releases due to the emergency situation, as described in
20.4.1.500 NMAC (incorporating 40 CFR §264.56 (e)). The WIPP Emergency Response
procedures utilize the incident mitigation guidelines in NFPA 471, Responding to Hazardous
Materials Incidents, with initial response priority being on control, and those actions necessary
to ensure confinement and containment (the first line of defense) in the early, critical stages of a
spill or leak. The RCRA Emergency Coordinator is responsible for stopping processes and
operations when necessary, and removing or isolating containers. TRU mixed waste will remain
within the WHB Unit, the Parking Area Unit, and the underground HWDU.

D-4d(1) All Emergencies

The WIPP Emergency Response procedures include, but are not limited to, the following
actions appropriate for control:

1. Isolate the area from unauthorized person by fences, barricades, warning signs, or
   other security and site control precautions. Isolation and evacuation distances vary,
   depending upon the chemical/product, fire, and weather situations.

2. Identify the chemical/product according to Section D-4b.

3. Drainage controls.

4. Stabilization of physical controls (such as dikes or impoundment[s]).
5. Capping of contaminated soils to reduce migration.

6. Using chemicals and other materials to retard the spread of the release or to mitigate its effects.

7. Excavation, consolidation, removal, or disposal of contaminated soils.

8. Removal of drums, barrels, or tanks where it will reduce exposure risk during situations such as fires.

If the facility stops operations in response to a fire, explosion, or release, the RCRA Emergency Coordinator shall ensure continued monitoring for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever appropriate. If operations continue, personnel normally assigned to these tasks will continue.

Both natural and synthetic methods will be employed to limit the releases of hazardous materials so that effective recovery and treatment can be accomplished with minimum additional risk to human health or the environment. A combination of the above methods to achieve protection of human health and the environment, with emphasis on two basic methods for mitigation of hazardous materials incidents - Physical and Chemical (Tables D-4, D-5) mitigation, will be used.

1. Physical methods of control involve any of several processes to reduce the area of the spill/leak, or other release mechanism (such as fire suppression).

   A. Absorption is the process in which materials hold liquids through the process of wetting. Absorption is accompanied by an increase in the volume of the sorbate/sorbent system through the process of swelling. Some of the materials utilized in response to Level I incidents or Level II incidents involving liquids will be absorbent sheets of polyolefin-type fibers, spill control bucket materials (specifically for solvents, neutralization, or for acids/caustics), and absorbent socks for general liquids or oils.

   B. Covering refers to a temporary form of mitigation for radioactive incidents that will be utilized in response to Level II or Level III incidents involving CH TRU mixed waste. These could include absorbent sheets, plastic, or actual ambulance blankets.

   C. Dikes or Diversions refer to the use of physical barriers to prevent or reduce the quantity of liquid flowing into the environment. Dikes may be soil or other barriers temporarily utilized to hold back the spill or leak. Diversions refer to the methods used to physically change the direction of the flow of the liquid. Absorbent socks or earth may be utilized as dikes or diversions for all levels of incidents.

   D. Overpackaging is accomplished by the use of an oversized container. Overpack containers will be compatible with the hazards of the materials involved.

   E. Plug and Patch refers to the use of compatible plugs and patches to reduce or temporarily stop the flow of materials from small holes, rips, tears, or gashes in containers. A Series “A” hazardous response kit containing nonsparking
equipment to control and plug leaks may be utilized for response to all levels of
incidents.

F. Transfer refers to the process of moving a liquid, gas, or some forms of solids,
either manually or by pump, from a leaking or damaged container. Scoops,
shovels, jugs, and pails as well as drum transfer pumps for chemical and
petroleum transfer are utilized as needed in response to all levels of incidents.

G. Vapor Suppression refers to the reduction or elimination of vapors emanating from
a spilled or released material through the most efficient method or application of
specially designed agents such as an aqueous foam blanket.

2. Chemical Methods of Mitigation

A. Neutralization is the process of applying acids or bases to a spill to form a neutral
salt. The application of solids for neutralizing can often result in confinement of the
spilled material. This would include using the neutralizing adsorbents.

B. Solidification is the process whereby a hazardous liquid is added to material such
as an absorbent so that a solid material results.

The established procedures are based upon the incident level and a graded approach for
nonradioactive or CH TRU waste emergencies and initiated to:

1. Minimize contamination or contact (through PPE, etc.)
2. Limit migration of contaminants
3. Properly dispose of contaminated materials

For RH TRU mixed waste that is not managed in shielded containers, the detection of
contamination on or damage to a RH TRU mixed waste canister or a facility canister may occur
outside the Hot Cell during cask to cask transfer of the canister or during loading of the Shielded
Insert in the Transfer Cell. When such contamination or damage is found, the Permittees have
the option to decontaminate or return the canister to the generator/storage site or another site
for remediation. In the case of a damaged facility canister, the Shielded Insert may be used as
an overpack to facilitate further management. Contamination may also be detected within the
Hot Cell during the unloading of the CNS 10-160B shipping cask. In this case, the Permittees
may decontaminate the 55-gallon drums or return them to the generator/storage site or another
site for remediation. Spills or releases that occur within the RH Complex or the underground as
the result of RH TRU mixed waste handling will be mitigated by using appropriate measures
which may include the items above.

D-4d(2) Fire

The incident level emergency response identified in Section D-3 includes fire/explosion
potential. WIPP fire response includes incipient, exterior structure fires, and internal structure
fires. The RCRA Emergency Coordinator can implement the Memoranda of Understanding
(MOU) for additional support.

The first option in mine fire response will be to apply mechanical methods to stop fires (e.g., cut
electrical power). The last option in mine fire response will be to reconfigure ventilation using
control doors associated with the underground ventilation system. The following actions are
implemented in the event of a fire:

1. All emergency response personnel at an incident will wear appropriate PPE.

2. Only fire extinguishing materials that are compatible with the materials involved in the
fire will be used to extinguish fires. Compatibility with materials involved in a fire are
determined by pre-fire plans, Emergency Response Guide Book (DOT, 1993), DOT
labeling, and site-specific knowledge of the emergency response personnel. Water
and dry chemical materials have been determined to be compatible with all
components of the TRU mixed waste. Pre-fire plans for the WHB are included in
Figures D-10 and D-11.

Fires in areas of the WHB Unit should not propagate, due to limited amount of
combustibles, and the concrete and steel construction of the structures. Administrative
controls, such as landlord inspections and EST/FPT inspections, help to insure good
housekeeping is maintained. Combustible material and TRU mixed waste will be
isolated, if possible. Firewater drain trenches collect the water and channel it into a
sump. In areas not adjacent to the trenches, portable absorbent dikes (pigs) will be
used to retain as much as possible, until it can be transferred to containers or sampled
and analyzed for hazardous constituents.

3. If the fire spreads or increases in intensity, personnel will be directed to evacuate.

4. The RCRA Emergency Coordinator will remain in contact with responding personnel to
advise them of the known hazards.

5. In order to ensure that storm drains and/or sewers do not receive potentially
hazardous runoff, dikes will be built around storm drains to control discharge as
needed. Collected waste will be sampled and analyzed for hazardous constituents,
before being discharged to evaporation ponds. There are two ponds south of the
security fence, opposite the WHB Unit, that will collect drainage from the parking area.
The rest of the site, inside the security fence, drains to the large pond to the west.
Samples will be taken from these ponds, after the emergency has been abated, to
determine any cleanup requirements. NMED will approve any procedures associated
with the sampling and analysis of the ponds.

6. The RCRA Emergency Coordinator maintains overall control of the emergency and
may accept and evaluate the advice of WIPP facility personnel and emergency
response organization members, but retains overall responsibility.

7. The RCRA Emergency Coordinator will be in overall control of WIPP facility
emergency response efforts until the emergency is terminated.

8. Materials involved in a fire can be identified in the following ways:

   • According to Section D-4b.

   • If the contents of the waste container cannot be determined based on its
     location and the label is destroyed by fire, the material will be treated as an
unknown, evaluated for radiological contamination, and analyzed according to methods in the EPA’s “Test Methods for Evaluating Solid Waste Physical/Chemical Methods” (SW-846), Third Edition, after the fire has been extinguished.

- Airborne radioactivity samples may be obtained during a fire involving radioactive materials, using portable and fixed air samplers. Response personnel will be adequately protected from airborne radioactivity by their PPE required for fire response.

9. Only materials compatible with the waste may be used for fire response.

10. When cleanup has proceeded to the point of finding no radionuclide activity, then the “swipe” can be sent for analysis for hazardous constituents. The use of these confirmation analyses is as follows:

- For waste containers, once radiologically clean and free of any visible evidence of hazardous waste spills on the container, it will be placed in the underground without further action.

- For area contamination, once the area is cleaned up and is shown to be radiologically clean, it will be sampled for the presence of hazardous waste residues (for further information see Section D-4d, Emergency Termination Procedures).

11. Fire suppression materials used in response to incidents will be retained on-scene, where an evaluation will be performed to determine appropriate recovery and disposal methods.

D-4d(3) Explosion

The following actions will be implemented in the event that an explosion that involves or threatens hazardous or TRU mixed waste or hazardous materials has occurred:

1. The area will be evacuated immediately.

2. The CMRO will immediately notify the appropriate emergency response personnel and the RCRA Emergency Coordinator about the explosion.

3. Injured personnel will be treated and transported as necessary.

4. The RCRA Emergency Coordinator will remain in contact with responding personnel to advise them of the known hazards involved and the degree and location of the explosion and associated fires.

5. As required by Permit Part 2, Section 2.12.4 and Attachment D, Section D-2, the RCRA Emergency Coordinator has the authority to commit the necessary resources to implement the RCRA Contingency Plan. The RCRA Emergency Coordinator may accept and evaluate the advice of WIPP facility personnel and emergency response organization members with regard to the selection of methods and tactics of response,
but retains the overall responsibility to commit the resources necessary to implement
the RCRA Contingency Plan.

6. The RCRA Emergency Coordinator will be in overall control of WIPP facility
emergency response efforts until the emergency is terminated.

7. When cleanup has proceeded to the point of finding no radionuclide activity, then
samples may be taken for chemical analysis if there is visible evidence to suspect
additional hazardous waste residues. Chemical residues on floor surfaces resulting
from a hazardous waste explosion will be evaluated, sampled, analyzed (if required),
isolated, and returned to appropriate containers, and surfaces will be cleaned using
appropriate cleaners.

8. The RCRA Emergency Coordinator may shut down operational units (e.g., process
equipment and ventilation equipment) that have been affected directly or indirectly by
the explosion. Once the areas have been determined safe for reentry, processes may
be reactivated.

D-4d(4) Spills

Protection of response personnel at a hazardous material incident is paramount. The primary
methods to protect personnel are time, distance, and shielding. If a Level II or III incident exists,
the RCRA Emergency Coordinator will implement the following actions:

1. The immediate area will be evacuated.

2. The RCRA Emergency Coordinator will review facility records to determine the identity
and chemical nature of released material.

3. Entry team procedures will be utilized, with special attention to the following:
   • Buddy system
   • Appropriate PPE
   • Backup rescue team
   • Supplemental communication signals (hand signals and hand-light signals)
   • Monitoring equipment
   • Exposure time limitations

4. If possible, the source of the release will be secured.

5. A dike to contain runoff may be built.

6. Emergency responders will ensure that storm drains and/or sewers do not receive
potentially hazardous runoff or spilled material. They may build dikes around storm
drains to control discharge.

7. Released wastes may be collected and contained by stabilizing or neutralizing the
spilled material, as appropriate, pouring an absorbent over the spilled material, and
sweeping or shoveling the absorbed material into drums or other appropriate
containers. The absorbents have been determined to be compatible with all
components of the TRU mixed waste.

8. No TRU mixed waste that may be incompatible with the released material will be
managed in the affected area until cleanup procedures are complete.

9. The RCRA Emergency Coordinator will direct spill control, decontamination, and
termination procedures described below.

D-4d(5) Decontamination of Personnel

Decontamination of personnel with radioactive contamination is the responsibility of the
Radiological Control (RC) section. If a person is contaminated with radioactivity during a site
evacuation to the staging areas, the contaminated area will be covered before the person can
be moved (under escort by RC personnel) to the staging area. The RC personnel will ensure the
contaminated person remains segregated from other site personnel while under RC supervision.

In the event of an emergency that requires immediate evacuation of the area, the contamination
can be covered by any method warranted, given the circumstance (e.g., clean clothing wrapped
around the area). If the size of the radioactive contamination on the body is small and localized,
it can be covered with clothing (e.g., glove, shoe cover, coveralls). If the size of the radioactive
contamination on the body is large, it may be covered by dressing the individual in a full set of
Anti-Contamination clothing (coveralls, hood, gloves, shoe covers, etc.).

If time and location permit and the contamination is on the face, it will be decontaminated
immediately using a cloth moistened with tepid water (and a mild detergent, if necessary). If the
size of the radioactive contamination on the individual’s body is small and localized, it will be
decontaminated using the same method as for the face, but after the individual has been
transferred to an area appropriate for conducting decontamination.

If the individual is transferred to the staging area prior to decontamination, he/she will be
decontaminated at the staging area using site procedures for personnel decontamination and
using decontamination supplies and equipment as appropriate for the extent and magnitude of
the contamination.

D-4d(6) Control of Spills or Leaking or Punctured Containers of CH and RH TRU Mixed Waste

In the event of spills or leaking or punctured containers of CH and RH TRU mixed waste, the
WIPP responds to three distinct phases: 1) the event, 2) the re-entry, and 3) the recovery.

During the event, the following immediate actions are completed: 1) stop work, 2) warn others
(notify CMR), 3) isolate the area, 4) minimize exposure, and 5) close off unfiltered ventilation.
These actions can take place simultaneously, as long as they are completed before proceeding
to the re-entry phase.

CH TRU Mixed Waste

Prior to the re-entry following an event involving containers that are managed as CH TRU mixed
waste, a Radiological Work Permit (RWP) is written for personnel to enter with protective
clothing to assess the conditions, take surveys and samples, and mitigate problems that could
compound the hazards in the area (cover up spilled material with plastic material sheeting and
or any approved fixatives such as paint, place equipment in a safe configuration, etc.). During
the re-entry phase, smears and air sample filters are taken and counted. This information is
used by cognizant managers, RC personnel, and As Low As Reasonably Achievable (ALARA)
Committee representatives to determine an appropriate course of action to recover the area. A
plan to decontaminate and recover affected areas and equipment will be approved with a
separate RWP written to establish the radiological controls required for the recovery.

During the recovery phase, the plan will be executed to utilize the necessary resources to
conduct decontamination and/or overpacking operations as needed. The completion of this
phase will occur prior to returning the affected area and/or equipment to normal activities. The
recovery phase will include activities to minimize the spread of contamination to other areas.
These activities will involve placing the waste material in another container; vacuuming the
waste material; overpacking or plugging/patching the spilled, leaking, or punctured waste
container; and/or decontaminating the affected area(s). If an affected surface cannot be
decontaminated to releasable levels, it may be covered with a fixative coating and established
as a Fixed Contamination Area to prevent spread of contamination, or it may be removed using
heavy machinery and tools, packaged in approved waste containers, and emplaced in the
underground. Every reasonable effort to minimize the amount of derived waste, while providing
for the health and safety of personnel, will be made.

Should a breach of a CH TRU mixed waste container occur at the WIPP that results in
removable contamination exceeding the small area “spot” decontamination levels, the affected
container(s) (e.g., breached and contaminated) will be placed into an available overpack
container (e.g., 85-gal drum, SWB, TDOP), except that TDOPs and SLB2s will be
decontaminated, repaired/patched in accordance with 49 CFR §173 and §178 (e.g., 49 CFR
§173.28), or returned to the generator. The decontamination of equipment and the overpacking
of contaminated/damaged waste containers will be performed in the vicinity of the incident. For
example, under normal operations CH TRU mixed waste will be handled only in the areas of the
WHB Unit. Therefore, it is within these same areas that decontamination and/or overpacking
operations would occur. By eliminating the transport of contaminated equipment to other areas
for decontamination or overpacking, the risk of spreading contamination is reduced.

Equipment used during a spill cleanup or CH TRU mixed waste overpacking operation could
include: cloths, brushes, scoops, absorbents, squeegees, tape, bags, pails, slings, hand tools,
and others as needed for a given incident.

At the underground emplacement room, salt contaminated by a spill of CH TRU mixed waste
would be either covered or cleaned up, depending on location, extent, and spilled material, due
to potential radioactive contamination spread via the salt dust. The contaminated salt would be
covered to isolate it from the workers, and the stacking of waste containers would resume or
would be removed and packaged as site-derived waste using applicable site procedures for
decontaminating surfaces.

The decontamination methods will initially involve wiping down structures, equipment, and other
containers in the area with absorbent cloths moistened with tepid water. Surveys of these
structures will take place and the need to continue decontamination activities will be
established. If further decontamination is required, nonhazardous decontaminating agents, such
as Liquinox®, Simple Green®, Windex®, citric acid, Bartlett Strip Coat®, and high pressure CO₂
will be used to prevent generating CH TRU mixed waste.
RWP's and other administrative controls provide protective measures to help ensure that new hazardous constituents will not be added during decontamination activities.

Certain structures and/or equipment may be disassembled to facilitate decontamination or may be placed directly into a derived waste container. Items used in the spill cleanup and decontamination operations (e.g., swipes, tools, PPE, etc.) may also be placed into a derived waste container.

When decontamination is deemed by the recovery team to be complete, RC personnel will conduct one final, intensive radon survey of the area and components in the area to release it for uncontrolled use. The free release criteria for items, equipment, and areas is < 20 dpm/100 cm² for alpha radioactivity and < 200 dpm/100 cm² for beta-gamma radioactivity. Personnel will then perform hazardous material sampling after decontamination efforts are complete to verify the removal of hazardous waste substances. After cleanup is complete, facility personnel will complete an inspection and include the details of the spill and cleanup in the log.

RH TRU Mixed Waste

For RH TRU mixed waste, the detection of contamination on or damage to a RH TRU mixed waste canister or a facility canister may occur outside the Hot Cell during cask to cask transfer of the canister or during loading of the Shielded Insert in the Transfer Cell. When such contamination or damage is found, the Permittees have the option to decontaminate or return the canister to the generator/storage site or another site for remediation. In the case of a damaged facility canister, the Shielded Insert may be used as an overpack to facilitate further management. Contamination may also be detected within the Hot Cell during the unloading of the CNS 10-160B shipping cask. In this case, the Permittees may decontaminate the 55-gallon drums or return them to the generator/storage site or another site for remediation. Spills or releases that occur within the RH Complex or the underground as the result of RH TRU mixed waste handling will be mitigated by using the following measures, as appropriate:

During the re-entry phase, an evaluation of the incident, including the nature of the release, amount, location, and other appropriate factors, will be performed. A RWP will be written and approved prior to personnel entering the Hot Cell with the appropriate PPE to further assess the situation, perform surveys and take samples, and, if possible, mitigate problems that could compound the hazards in the area. Based on the results of the evaluation, a determination will be made by the RCRA Emergency Coordinator, with input from the cognizant managers, radiological control personnel, and ALARA Committee representatives whether to implement the Contingency Plan and to determine the appropriate course of action to recover from the event. An action response plan to decontaminate and recover affected areas and equipment, together with an RWP establishing the radiological controls required for the recovery will be developed and approved.

Should a breach of a RH TRU mixed waste container occur in the Hot Cell that results in removable contamination exceeding the small area “spot” decontamination levels, the affected container(s) (e.g., breached and contaminated) will be placed into a canister and processed for disposal. The decontamination of equipment, cleanup of spilled material and the overpacking of contaminated/damaged waste containers will be performed in the vicinity of the incident. For example, under normal operations RH TRU mixed waste in 55-gallon drums will be handled only in the Hot Cell. Therefore, it is within this area that decontamination and/or overpacking operations would occur. By eliminating the transport of contaminated equipment to other areas
for decontamination or overpacking, the risk of spreading contamination is reduced. Contaminated materials for the cleanup and overpacking of a breached RH TRU mixed waste container may be managed as CH TRU mixed waste, depending on the surface dose rate.

Equipment used during a spill cleanup or RH TRU mixed waste overpacking operation could include: cloths, brushes, scoops, absorbents, squeegees, tape, bags, pails, slings, hand tools, and other equipment as needed for a given incident.

The decontamination methods may initially involve wiping down structures, equipment, and other containers in the area with absorbent cloths moistened with tepid water. Surveys of these structures will take place and the need to continue decontamination activities will be established. If further decontamination is required, nonhazardous decontaminating agents, such as Liquinox®, Simple Green®, Windex®, citric acid, Bartlett Strip Coat®, and high pressure CO₂ will be used to prevent generating CH TRU mixed waste.

RWP's and other administrative controls provide protective measures to help ensure that new hazardous constituents will not be added during decontamination activities.

Certain structures and/or equipment within the Hot Cell may be disassembled to facilitate decontamination or may be placed directly into a derived waste container. Items used in the spill cleanup and decontamination operations (e.g., swipes, tools, PPE, etc.) may also be placed into a derived waste container.

When decontamination of the Hot Cell is deemed by the recovery team to be complete, RC personnel will conduct one final, intensive radon survey of the area and components in the area to release it for continued use. The free release criteria for items and equipment that will be released for uncontrolled use are < 20 dpm/100 cm² for alpha radioactivity and < 200 dpm/100 cm² for beta-gamma radioactivity. Personnel will then perform hazardous material sampling after decontamination efforts are complete to confirm the removal of hazardous waste substances. After cleanup is complete, facility personnel will complete an inspection and include the details of the spill and cleanup in the log. The recovery phase must be completed before the affected area and/or equipment are returned to service.

D-4d(7) Natural Emergencies

After a natural emergency (earthquake, flood, lightning strike, etc.) that involves hazardous waste or hazardous materials, the FSM will ensure the following actions are taken:

1. Inspect containers which have not been disposed and containment for signs of leakage or damage. Inspect areas where containers are stored looking for leaking containers and for deterioration of containers and the containment system.

2. Inspect affected equipment or areas associated with hazardous waste management activities for proper operating mode in accordance with site procedures and manually check to ensure automatic and alarmed features on the units are working.

3. Inspect affected equipment or areas within the HWMUs in accordance with site procedures for damage.

4. Inspect electrical boards and overhead electrical lines for damage.
5. Check container areas for signs of leakage or damage to drums and containers.

6. Check affected buildings and fencing directly related to hazardous waste management activities for damage.

7. Conduct a general survey of the site looking for signs of land movement, etc.

8. Take any necessary corrective measures, however temporary, to rectify potential or real problems.

9. Record inspection results.

D-4d(8) Roof Fall

Roof fall is not expected to affect RH TRU mixed waste because it is emplaced in the rib of the disposal room and not subject to impact from a roof fall. The following incident description and mitigation apply to CH TRU mixed waste.

The WIPP underground is routinely evaluated for stability and safety of the underground openings. These evaluations can be as simple as the MSHA required visual checks by personnel working in the area or as extensive as the expert review of the roof support system for Room 1 Panel 1 conducted in 1991. An in-depth evaluation of all of the accessible underground is performed on an annual basis as part of the formal ground control operating plans. Weekly visual and sounding inspections are performed by the Permittees. More frequent inspections and evaluations are performed in areas where roof or ribs are in need of evaluations, based on visual observations, analysis of rock deformation data, excavation effects program data acquired from observation holes, and support system performance.

This process applies not only to the waste disposal rooms but to the entire WIPP underground. Prior to waste emplacement, stability of each room will be evaluated. This evaluation will concentrate on the age and current performance of the installed support systems (if any) and the rate of roof beam expansion based on data from installed instrumentation. The roof support system’s performance and surety, to provide the support necessary for the required time will be addressed. Criteria used will include design parameters such as the amount of load, the deformation of the installed system, and the number and type of component failures observed, if any. Geotechnical criteria will include parameters such as the type and quantity of fracturing, roof beam expansion rates, and future ground performance based on a predictive model.

Should the evaluation results indicate that remedial actions are necessary prior to placement of waste, experiences at the WIPP indicate that rebolting or installing supplemental support can extend the safe life of a room for several years.

After waste emplacement commences, geomechanical monitoring will continue with monitors that are tied into a computer network program. The readings obtained will provide information needed for the roof beam stability assessment. Visual observations of the ground and the support systems will also continue in all accessible areas. Based on the experiences from the Site and Preliminary Design Validation test rooms, it has been proven that any developing instability will be detected through monitoring. Multiple measures to deal with the observed conditions can be implemented months before an event to mitigate any risk associated with a roof fall in the storage room or any affected area within the mine. At a minimum, the affected
area will be isolated and withdrawn from ventilation flow. Isolation operations will utilize current
available methods, materials, and equipment.

Ground control conditions which could result in a fall can be divided into two scenarios: The first
consists of spalling (falling) of individual small and localized rock falling on waste containers.

By definition, they can be considered insignificant as no damage to the drums can occur. The
second consists of an entire section of roof falling on multiple stacks of waste containers. Each
of these scenarios is discussed below.

**Spalling-of-Ground Scenario**

The maximum distance between the room roof and a container of waste is 10 ft. Waste
containers are designed to withstand impact loads of at least 1,000 pounds (lbs) dropped
from a height of 6 ft flat or 450 lbs dropped on a circumferential edge from a height of 4 ft.
Both of which correspond to an allowable impact stress of 25,450 pounds per square inch
(ksi). Rocks from spalling are small and would not be of sufficient weight when striking a
drum from a 10 ft vertical height to cause an impact stress of more than 25,450 psi. Taking
into account the falling distance, average weight, and the typical shape of the salt rock, the
conclusion is that puncturing a drum by spalling is non-credible.

**Fall-of-Ground Scenario**

Fall-of-ground occurs when a large section of roof beam falls onto the waste containers.
As previously discussed, the possibility of this occurring in an active room is remote, due
to continuous monitoring and engineered roof support systems.

The following actions have been developed and will be taken by the RCRA Emergency
Coordinator should a rock fall occur in an active waste emplacement area of the repository:

**Spalling-of-Ground Actions**

1. Determine whether the roof conditions allow for safe entry and if the waste container or
   containers in question are accessible.

   The process used to determine if a roof condition of a room will allow for safe entry is
   the same as the ground control inspection process used for inspection of the ground
   conditions and roof bolt integrity. The inspection will begin at a safe and sound roof
   starting point and consist of visual inspections of roof bolts, roof, and rib areas for
   missing or damaged bolts; deformed roof bolt plates; or roof and rib cracks, fractures,
   or separations. If during the visual inspection suspicious roof bolts, roof, or ribs are
   found, then operators will proceed with sounding the area in question with a scaling
   bar for loose roof bolts, bad roof, or ribs (loose roof bolts will not ring when sounded).
   Bad roof or ribs will have a drummy, hollow, or un-solid sound when struck with the
   scaling bar. When this operation is performed, a safe avenue for retreat is always
   maintained. Also maintained is a position such that an unexpected event will not place
   personnel in a position where the scaling bar or material being sounded could fall on
   personnel. If the inspection reveals ground that cannot be safely scaled manually or
   with the available mining equipment, the affected area, up to and including the entire
   room, will be barricaded and removed from ventilation flow.
The criteria used to determine whether a waste container is accessible is based on the location of the container, the amount of waste in the room, and the expense of reaching the waste container safely versus the expense of abandonment of the room. For example, if the room is 95% filled and spalling-of-ground punctured a waste container at or near the exit of the room, the decision to isolate the room and move waste emplacement activities to the next room would be prudent.

2. Restrict access in ventilation flow path downstream of the incident.

3. Restrict ventilation to the affected room to ensure that there is no spread of contamination that may have been released. Survey for contamination and establish the boundaries.

4. Inspect accessible and affected containers and containment for signs of leakage or damage.

5. Cover the spill area with material such as plastic or fabric sheets or paint, in a way that would safely isolate the area.

6. Determine if the covered spill area safely allows for continued waste disposal operations or whether further cleanup is required. If further cleanup is required, provide with cleanup methods described below. Note: Cleaning may not be required since this is the permitted disposal area.

7. Inspect any affected equipment (vehicles, handling equipment, and communication and alarm equipment) for proper function.

8. Repackage spilled waste and repackage, plug, or patch breached waste containers into 55 or 85-gallon drums, SWBs, or TDOPs, depending on volume. Temporarily locate overpack waste containers in an adjacent room. Remove only those intact waste containers necessary to clear the area for decontamination.

9. At the underground emplacement room, salt contaminated by a spill of TRU mixed waste will be covered with materials such as salt, plastic or fabric sheets or PVA to isolate it from the workers or removed and packaged as site derived waste in accordance with site procedures for decontaminating surfaces.

10. Manage the radioactive debris as derived waste.

11. Characterize containers of waste based on the waste containers that were damaged.

12. Replace the removed and derived waste containers into the waste stack as appropriate and update the WWIS.


Fall-of-Ground Actions

1. Restrict access in ventilation flow path downstream of the incident.
2. Restrict the room from ventilation flow by closing bulkhead regulators.

3. Survey for radiological contamination and establish the boundary for a Radiological Buffer Area.

4. Install barricade devices to remove access.

5. At the underground emplacement room, salt contaminated by a spill of TRU mixed waste will be covered with materials such as salt, plastic or fabric sheets, or PVA to isolate it from the worker or removed and packaged as site derived waste using damp rags, hand tools, and HEPA filtered vacuums.

   The criteria used to determine whether to close the entire panel or just the affected room of waste containers would include the location of the roof fall and the stability of the unaffected roof area in the panel. Techniques to determine the stability would be the same as previously described in this section.

D.4d(9) Structural Integrity Emergencies

In the event of a WIPP facility emergency involving underground structural integrity, the situation will be handled as a natural emergency. Monitoring and inspection procedures ensure the safety and integrity of the WIPP facility underground.

D.4d(10) Emergency Termination Procedures

For the transition from emergency phase to cleanup phase, the following items will be complete:

- Emergency scene will be stable
- Release of hazardous substance will be stopped
- Reaction of hazardous substance will be controlled
- The released hazardous substance will be contained within a localized and manageable area
- The area of contamination will be adequately secure from unauthorized entry

At every incident involving hazardous materials, there is a possibility that response personnel and their equipment will become contaminated. Emergency response personnel have procedures to minimize contamination or contact, and to properly dispose of contaminated materials.

For nonemergencies and Incident Level I emergencies, the following methods of decontamination are available for personnel, environment, and/or equipment according to emergency response procedures:

- Absorption
- Adsorption
- Chemical degradation
• Dilution
• Disposal
• Isolation
• Neutralization
• Solidification

Any necessary verification of air, soil, or water samples will be directed by the RCRA Emergency Coordinator. Immediately after an emergency, the RCRA Emergency Coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility in accordance with standard operating procedures.

For Level II and III incidents after the emergency itself is controlled and contained, the RCRA Emergency Coordinator will be responsible for the development and implementation of an incident-specific decontamination plan.

PPE will be decontaminated or disposed according to procedure before it is returned to its storage location.

As part of the facility’s defense-in-depth approach, equipment will be assumed to be contaminated after each hazardous material response and a thorough check for radioactive contamination will be conducted. If contamination is found, a technically sound decontamination process will be followed. Many types of equipment are difficult to decontaminate and may have to be discarded as hazardous or derived waste. Whenever possible, pieces of equipment will be disposable or made of nonporous material.

If radioactive contamination is detected on equipment or on structures, it will be assumed that hazardous constituents may also be present. Radiological surveys to determine whether a potential release of hazardous constituents has occurred (Permit Attachment G3) will be used along with other techniques as a detection method to determine when decontamination is required. Radiological cleanup standards will be used to determine the effectiveness of decontamination efforts. To provide verification of the effectiveness of the removal of hazardous waste constituents, once a contaminated surface is demonstrated to be radiologically clean, the “swipe” can be sent for analysis for hazardous constituents. The use of these confirmation analyses is as follows:

For waste containers, the analyses become documentation of the condition of the container at the time of emplacement. These containers will be placed in the underground without further action, once the radiological contamination is removed, unless there is visible evidence of hazardous waste spills or hazardous waste on the container and this contamination is considered likely to be released prior to emplacement in the underground. In no case shall these containers contain a total liquid content equal to, or which exceeds, one volume percent of the container.

For area contamination, once the area is cleaned up and is shown to be radiologically clean, it will be sampled for the presence of hazardous waste residues. If the area is large, a sampling plan will be developed. The sampling plan will be approved by the NMED before it is implemented. If the area is small, swipes will be used. If the results of the analysis show that residual contamination remains, a decision will be made whether
further cleaning will be beneficial or whether final clean up will be deferred until closure. Appropriate notations will be entered into the operating record to assure proper consideration of formerly contaminated areas at the time of closure. Furthermore, measures such as covering, barricading, and/or placarding will be used as needed to mark areas that remain contaminated.

For all Contingency Plan emergency responses, the RCRA Emergency Coordinator will ensure, in keeping with standard operating procedures, that, in the affected area(s) of the facility:

- No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed
- All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use, or replaced before operations are resumed

D-4e Prevention of Recurrence or Spread of Fires, Explosions, or Releases

During an emergency, the RCRA Emergency Coordinator will ensure that reasonable measures are taken so that fires, explosions, and releases do not occur, recur, or spread to TRU mixed waste or other hazardous materials at the facility, as required under 20.4.1.500 NMAC (incorporating 40 CFR §§264.56(e) and (f)). These measures include:

- Stopping processes and operations.
- Collecting and containing released wastes and materials.
- Removing or isolating containers of waste or hazardous substances posing a threat.
- Ensuring that wastes managed during an emergency are handled, stored, or treated with due consideration for compatibility with other wastes and materials on site and with containers utilized (Section D-4h).
- Restricting personnel not needed for response activities from the scene of the incident.
- Evacuating the area.
- Curtailing nonessential activities in the area.
- Conducting preliminary inspections of adjacent facilities and equipment to assess damage.
- Overpacking and/or removing damaged containers/drums from affected areas. Damaged equipment and facilities will be repaired as appropriate.
- Constructing, monitoring, and reinforcing temporary dikes as needed.
- Maintaining fire equipment on standby at the incident site in cases where ignitable liquids have been or may be released and ensuring that all ignition sources are kept...
out of the area. Ignitable liquids will be segregated, contained, confined, diluted, or
otherwise controlled to preclude inadvertent explosion or detonation.

No operation that has been shut down in response to the incident will be restarted until
authorized by the RCRA Emergency Coordinator. Sections D-4g, Incompatible Waste, and D-
4h, Post-Emergency Facility and Equipment Maintenance and Reporting, address specific
issues related to decreasing the possibility of a recurrence or spread of a release, a fire, or an
explosion.

After resolution of the incident, a Root Cause Analysis will be conducted to review all Level II
and Level III incidents for determination of cause, and the corrective action plan to prevent
recurrence.

D-4f Management and Containment of Released Material and Waste

Once initial release or spill containment has been completed, the RCRA Emergency
Coordinator will ensure that recovered hazardous materials and waste are properly stored
and/or disposed, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.56(g)). For spills
of liquid, the perimeter of the spill will be diked with an absorbent material that is compatible with
the material(s) released. Free-standing liquid will be transferred to a marked compatible
container. The remaining liquid will be absorbed with an absorbent material and swept or
scraped into a marked compatible container. Spill residue will be removed. Spills of dry material
will be swept or shoveled into a labeled compatible recovery container. Material recovered from
the spill will be transferred to clean containers or tanks or to containers or tanks that have held a
compatible material. All containers will meet DOT specifications for shipping the wastes, and
materials will be recovered.

Nonradioactive hazardous waste resulting from the cleanup of a fire, an explosion, or a release
involving a nonradioactive hazardous waste or hazardous substance at the WIPP facility will be
contained and managed as a hazardous waste until such time as the waste is disposed of, or
determined to be nonhazardous, as defined in 20.4.1.200 NMAC (incorporating 40 CFR §261)
Subparts C and D. In most cases, hazardous materials inventories for the various buildings and
areas at the facility will allow a determination of the hazardous materials present in any cleanup
of a release or of the residues from an emergency condition (The quantities of such spills are so
small, it is not likely to trigger an Incident Level II or III). When necessary samples of the waste
will be collected and analyzed to determine the presence of any hazardous characteristics
and/or hazardous waste constituents; this information is needed to evaluate disposal options.
EPA-approved sampling and analytical methods will be utilized. Hazardous wastes will be
transferred to the Hazardous Waste Staging Area. The staging area is used to store hazardous
waste awaiting transfer to an off-site treatment or disposal facility in accordance with applicable
regulations (e.g., 20.4.1 NMAC and DOT regulations). The Hazardous Waste Staging Area for
nonradioactive hazardous waste is Buildings 474A and 474B, as shown in Figure D-1.
Nonradioactive hazardous wastes will be shipped off-site for disposal at a RCRA permitted
disposal facility.

Under normal operations, administrative controls will be implemented to ensure that hazardous
materials and incompatible materials will not be introduced to the radioactive materials area
during TRU mixed waste handling operations. Examples of administrative controls include
restricting the waste received in the TRU mixed waste management area(s) to TRU mixed
waste properly manifested from the generator sites and ensuring that materials used in these
area(s) are restricted to only those that have previously been determined to be compatible with
the TRU mixed waste. The RCRA Emergency Coordinator will have access to building design
information and information on specific equipment used within an area upon which to base a
determination of the compatibility of materials with the area. If necessary, the RCRA Emergency
Coordinator will use EPA-600/2-80-076, "A Method for Determining the Compatibility of
Hazardous Waste," (EPA, 1980) for making compatibility determinations. Waste resulting from
the cleanup of a fire, explosion, or release in the miscellaneous unit, the CH TRU mixed waste
handling areas, or the RH Complex will be considered derived from the received TRU mixed
waste and may be treated and managed as CH TRU mixed waste depending on the surface
dose rate.

In the event of a prolonged cessation of TRU mixed waste handling operations, TRU mixed
waste can be placed in areas of the WHB Unit that are available for such contingencies. These
areas and the TRU mixed waste containers in them will be located so that adequate aisle
space would be maintained for unobstructed movement of personnel and equipment in an
emergency. Permit Attachments A1 and A2 describe the HWMUs in detail, including the facility
description, support structures and equipment, security, waste handling areas, ventilation, and
fire protection.

The contaminated area will be decontaminated. If a release is to a permeable surface, such as
soil, asphalt, concrete, or other surface, the surface material will be removed and placed in
containers meeting applicable DOT requirements. Contaminated soil, asphalt, concrete, or other
surface material, as well as materials used in the cleanup (e.g., rags and absorbent material)
will be contained and disposed of in the same manner as dictated for the contaminant. Clean
soil, new asphalt, or new concrete will be emplaced at the spill location.

If a spill occurs on an impermeable surface, the surface will be decontaminated with water
and/or a detergent. In the event that the spilled material is water reactive, a compatible
nonhazardous cleaning solution will be used. Contaminated wash water or cleaning solution will
be transferred to an appropriate container, marked, and managed as described above for
nonradioactive or radioactive liquid wastes.

In the event of a hazardous material or hazardous waste release, the RCRA Emergency
Coordinator will ensure that no wastes will be received or disposed of in the affected areas until
cleanup operations have been completed. This is to ensure that incompatible waste will not be
present in the vicinity of the release.

Because of the restrictions which the WIPP facility places on generators, and because of control
of WIPP operations, TRU mixed wastes and derived wastes will not contain any incompatible
wastes. However, the areas established for the temporary holding of nonradioactive waste
routinely generated at the WIPP facility is divided into bays to accommodate the management of
wastes that may be incompatible. If waste is generated as the result of a spill or release of
hazardous materials or nonradioactive hazardous waste, the waste generated as a result of
abatement and cleanup will be evaluated to determine its compatibility with other wastes being
managed in the temporary holding areas. The evaluation will be by identifying the material or
waste that was spilled or released and determining its characteristics (e.g., ignitable, reactive,
corrosive, or toxic). The waste generated by the abatement and cleanup activities will be stored
in that part of the temporary holding area that has been established to manage wastes with
which it is compatible.
For small nonemergency liquid spills (e.g., a detergent solution leaking out of the pump handle
during decontamination, a spill of hydraulic fluid while servicing a vehicle), spill control
procedures will be used to contain and absorb free-standing liquid. The contaminated absorbent
will be swept or shoveled into a compatible container and managed as described above. No
notifications will be required, but site procedures require documentation of the incident.

D-4g  Incompatible Waste

Implementation of the TSDF-WAC for the WIPP ensures that incompatible TRU mixed waste
will not be shipped to the WIPP facility. Nonradioactive waste at the WIPP facility will be
carefully segregated during handling and holding and will be transported within and off the
facility. The RCRA Emergency Coordinator will not allow hazardous or TRU mixed waste
operations to resume in a building or area in which incompatible materials have been released
prior to completion of necessary post-emergency cleanup operations to remove potentially
incompatible materials. In making the determination of compatibility, the RCRA Emergency
Coordinator will have available the resources and information described in Section D-4b,
Identification of Hazardous Materials. In addition, ES&H department personnel will be available
for consultation. Finally, the RCRA Emergency Coordinator may use EPA-600/2-80-076, (EPA,
1980).

D-4h  Post-Emergency Facility and Equipment Maintenance and Reporting

The RCRA Emergency Coordinator will ensure that emergency equipment that is located or
used in the affected area(s) of the facility and listed in the Contingency Plan is cleaned and
ready for its intended use before operations are resumed, as specified in 20.4.1.500 NMAC
(incorporating 40 CFR §264.56(h)(2)). Any equipment that cannot be decontaminated will be
discarded as waste (e.g., hazardous, mixed, solid), as appropriate. The WIPP facility is
committed to replacing any needed equipment or supplies that cannot be reused following an
emergency. After the equipment has been cleaned, repaired, or replaced, a post-emergency
facility and equipment inspection will be performed, and the results will be documented.

Cleaning and decontaminating equipment will be accomplished by physically removing gross or
solid residue; rinsing with water or another suitable liquid, if required; and/or washing with
detergent and water. Decontamination and cleaning will be conducted in a confined area, such
as a wash pad or building equipped with a floor drain and sump isolated from the environment.
Care will be taken to prevent wind dispersion of particles and spray. Liquid or particulate
resulting from cleaning and decontamination of equipment will be placed in clean, compatible
containers. Waste produced in an emergency cleanup in the TRU mixed waste handling areas
is derived waste and will be emplaced in the underground derived waste emplacement area.
Waste resulting from decontamination operations elsewhere in the WIPP facility will be analyzed
for hazardous waste constituents and/or hazardous waste characteristics to ensure proper
management.

When the WIPP facility has completed post-emergency cleanup of waste and hazardous
residues from areas where waste management operations are ready to resume and the RCRA
Emergency Coordinator has ensured that emergency equipment used in managing the
emergency has been cleaned or replaced and is fit for service, the notifications will be made by
the Permittees to the following: the EPA Region VI Administrator; the Secretary of the NMED;
and any relevant local authorities. This post-emergency notification complies with 20.4.1.500
NMAC (incorporating 40 CFR §264.56(i)), and is the responsibility of the RCRA Emergency Coordinator.

D-4i Container Spills and Leakage

The waste received at the WIPP facility will meet stringent TSDF-WAC (e.g., no more than one percent liquid), which will minimize the possibility of waste container degradation and liquid spills. Should a spill or release occur from a container, following an initial assessment of the event, the WIPP facility will immediately take the following actions, in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.52(a) and §264.171):

- Assemble the required response equipment, such as protective clothing and gear, heavy equipment, empty drums, overpack drums, and hand tools
- Transfer the released material to a container that is in good condition or overpack the leaking container into another container that is in good condition
- Once the release has been contained, determine the areal extent of migration of the release and proceed with appropriate cleanup action, such as chemical neutralization, vacuuming, or excavation

D-4i Tank Spills and Leakage

The TRU mixed waste handling areas at the WIPP facility do not include tank storage or treatment of hazardous waste, as defined in 20.4.1.101 NMAC (incorporating 40 CFR §260.10), and as regulated under 20.4.1.500 NMAC (incorporating 40 CFR §264) Subpart J. At the WIPP facility, tanks are used to store water and petroleum fuels only. The petroleum tanks store diesel and unleaded gasoline.

D-4k Surface Impoundment Spills and Leakage

The WIPP facility does not manage hazardous or TRU mixed waste using a surface impoundment, as defined in 20.4.1.101 NMAC (incorporating 40 CFR §260.10), and as regulated under 20.4.1.500 NMAC (incorporating 40 CFR, §264) Subpart K. Surface impoundment regulations are not applicable to the WIPP facility.

D-5 Emergency Equipment

A variety of equipment is available at the facility for emergency response, containment, and cleanup operations in both the HWWMUs and the facility in general. This includes equipment for spill control, fire control, personnel protection, monitoring, first aid and medical attention, communications, and alarms. This equipment is immediately available to emergency response personnel. A listing of major emergency equipment available at the WIPP facility, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.52(e)), is shown in Table D-6. Table D-7 identifies the locations where fire suppression systems are provided. Locations of the underground emergency equipment are shown in Figure D-5. The firewater-distribution system map is shown in Figure D-6. The underground fuel area fire-protection system is shown in Figure D-7.
D-6  Coordination Agreements

The Permittees have established MOUs with off-site emergency response agencies for firefighting, medical assistance, hazardous materials response, and law enforcement. In the event that on-site response resources are unable to provide all the needed response actions during either a medical, fire, hazardous materials, or security emergency, the RCRA Emergency Coordinator will notify appropriate off-site response agencies and request assistance. Once on site, off-site emergency response agency personnel will be under the direction of the RCRA Emergency Coordinator.

The MOUs with off-site cooperating agencies are available from the Permittees. A listing and description of the MOUs with state and local agencies and mining operations in the vicinity of the WIPP facility, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.37 and §264.52(c)), are:

- An agreement among the Permittees, Intrepid Potash NM LLC, and Mosaic Potash Carlsbad Inc., provides for the mutual aid and assistance, in the form of MRTs, in the event of a mine disaster or other circumstance at either of the two facilities. This provision ensures that the WIPP MOC will have two MRTs available at all times when miners are underground.

- A memorandum of agreement between the City of Carlsbad, New Mexico, and the WIPP MOC for ambulance service assistance provides that, upon notification by the WIPP MOC, the Carlsbad Fire Department/Ambulance Service will be dispatched from Carlsbad toward the WIPP site by a designated route and will accept the transfer of patient(s) being transported by the WIPP facility ambulance at the point both ambulances meet. If the patient(s) is not transferrable, the Carlsbad Fire Department/Ambulance Service will provide equipment and personnel to the WIPP facility ambulance, as necessary.

- A MOU between the DOE and the Carlsbad Medical Center provides for the treatment of radiologically contaminated personnel who have incurred injuries beyond the treatment capabilities at the WIPP facility. The DOE will provide transport of the patient(s) to the Carlsbad Medical Center for decontamination and medical treatment.

- A MOU between the DOE and the Lea Regional Medical Center provides for the treatment of radiologically contaminated personnel who have incurred injuries beyond the treatment capabilities at the WIPP facility. The DOE will provide transport of the patient(s) to the Lea Regional Medical Center for decontamination and medical treatment.

- A MOU between the DOE and the U.S. Department of Interior (DOI), represented by the Bureau of Land Management (BLM), Roswell District, provides for a fire-management program that will ensure a timely, well-coordinated, and cost-effective response to suppress wild fire within the withdrawal area using the WIPP incident commander for fire-management activities. The DOI will provide firefighting support if requested. In addition, the MOU provides for responsibilities concerning cultural resources, grazing, wildlife, mining, gas and oil production, realty/lands/rights-of-way, and reclamation.
• A mutual-aid firefighting agreement between the Eddy County Commission and the
DOE provides for the assistance of the Otis and Joel Fire Departments (a volunteer
fire district created under the Eddy County Commission and the New Mexico State Fire
Marshall’s Office), including equipment and personnel, at any location within the WIPP
Fire Protection Area upon request by an authorized representative of the WIPP
Project. These responsibilities are reciprocal.

• A mutual-aid agreement between the City of Hobbs and the DOE provides for mutual
ambulance, medical, fire, rescue, and hazardous material response services; provides
for joint annual exercises; provides for use of WIPP facility radio frequencies by the
City of Hobbs during emergencies; and provides for mutual security and law
enforcement services, within the appropriate jurisdiction limits of each party.

• A mutual-aid agreement between the City of Carlsbad and the DOE provides for
mutual ambulance, medical, fire, rescue, and hazardous material response services;
provides for joint annual exercises; provides for use of WIPP facility radio frequencies
by the City of Carlsbad during emergencies; and provides for mutual security and law
enforcement services, within the appropriate jurisdiction limits of each party.

• A MOU between the DOE and the New Mexico Department of Public Safety (DPS)
concerning Mutual Assistance and Emergency Management applies to any actual or
potential emergency or incident that: 1) involves a significant threat to employees of
the Permittees or general public; 2) involves property under the control or jurisdiction
of either the DOE or the State; 3) involves a threat to the environment which is
reportable to an off-site agency; 4) requires the combined resources of the DOE and
the state; 5) requires a resource that the DOE has which the State does not have, or a
resource the State has which DOE does not have; or 6) involves any other incident for
which a joint determination has been made by the DOE and the State that the
provisions of this MOU will apply. The MOU provides that the DPS shall permit
qualified and security cleared DOE Emergency Management members into the State
EOC for the purpose of: a) coordinating communications functions; b) evaluating and
maintaining communications capabilities; c) participating in exercises; d) link the
State’s High Frequency radio communications network with the DOE; and e) assisting
the State during radioactive materials accidents that require joint operations or the use
of the DOE Radiological Assistance Program team. The DOE shall permit qualified
and security cleared members the State Emergency Management community into the
DOE’s EOCs for the purposes of coordinating communications and activities.
Additional duties for each participant are specified for assistance in incidents or
emergencies.

D-7 Evacuation Plan

If it becomes necessary to evacuate the WIPP facility, the assigned on-site and off-site staging
areas have been established. The off-site staging areas are outside the security fence. The
WIPP facility has implementation procedures for both surface and underground evacuations.
Drills are performed on these procedures at the WIPP facility at least once annually. The
following sections describe the evacuation plan for the WIPP facility, as required under
20.4.1.500 NMAC (incorporating 40 CFR §264.52(f)).
D-7a  Surface Evacuation On-site and Off-site Staging Areas

Figure D-8 shows the surface staging areas. Personnel report to their Office Wardens at
designated staging areas where accountability is conducted. If site evacuation is necessary, the
RCRA Emergency Coordinator will decide which staging areas are to be used and will advise
Office Wardens of the selections. The RCRA Emergency Coordinator will communicate the
locations to Office Wardens via office warden pager, radio, plectron, WIPP Security, or
telephone, as appropriate. Office Wardens will direct personnel to the selected staging area
outside the security fence. Personnel who are working in a contaminated area when site
evacuation is announced, will assemble at specific staging areas to minimize contact with other
personnel during the evacuation (Figure D-8).

Office Wardens conduct accountability of personnel assigned to their specific areas. For
complete surface accountability, the Office Wardens report to their ACOW, who reports to the
COW. When the COW has reports from all ACOWs, surface accountability is reported to the
CMRO, who then notifies the RCRA Emergency Coordinator of the accountability.

The COW and all ACOWs communicate between themselves and the CMRO using devices
(e.g., telephones, radios, pagers, the public address system, email, internet). The Office
Wardens, Assistant Office Wardens, ACOWs, and COW are notified by a public address
announcement (or other devices) in accordance with emergency response procedures for
evacuation or sheltering in place. At the staging areas Office Wardens report directly to their
ACOW.

There are three off-site staging areas identified on Figure D-8. The RCRA Emergency
Coordinator determines which staging area will be used. Security officers remain at the primary
staging area gate 24 hours a day, and the vehicle trap is opened for personnel during
emergency evacuations. The north gate has a single person gate and large gate which can be
opened, similar to the main gates for the primary staging area. The east gate is a turnstile gate.
Upon notification by the RCRA Emergency Coordinator, Security will respond, open gates, and
facilitate egress for evacuation.

The on-site staging areas are identified in Figure D-8. These are used for building or area
evacuations as determined by the RCRA Emergency Coordinator.

D-7b  Underground Assembly Areas and Egress Hoist Stations

In the event of an underground or surface event, the RCRA Emergency Coordinator can call for
underground personnel to report to assembly areas (Figure D-9). Underground personnel are
also trained to immediately report to assembly areas under specific circumstances (i.e. loss of
underground power or ventilation). If accountability is required, the underground will be
evacuated. The Underground Controller is responsible for underground accountability by
comparing the brass numbers with the brass tags signed out in the lamproom. Each assembly
area contains a Mine Page Phone, miner’s aid station, and evacuation maps.

In accordance with 30 CFR §57.11, the mine maintains two escapeways. These escapeways
are designated as Egress Hoist Stations. When an underground evacuation is called for, all
underground personnel report to the Egress Hoist Stations.
Decontamination of underground personnel will be conducted the same way as described for surface decontamination. Contaminated personnel are trained to remain segregated from other personnel until RC personnel can respond to the incident at the underground location.

D-7c  Plan for Surface Evacuation

Surface evacuation notification is initiated by the RCRA Emergency Coordinator directing the CMRO to sound the surface evacuation alarm. The Office Wardens assist personnel in evacuation from their areas. Evacuation routes and instructions are posted throughout the site.

If the FSM/CMRO notifies the ERT members by a communication device (e.g., pager) to respond to an identified area, these members will not depart the site during an evacuation, but will report to the FSM for instructions and accountability. The EST/FPT notifies the COW of response members present. These personnel will not evacuate until released by the RCRA Emergency Coordinator.

D-7d  Plan for Underground Evacuation

Notification for underground evacuation will be made using the underground evacuation alarm and strobe light signals.

Personnel will evacuate to the nearest egress hoist station. Primary underground evacuation routes (identified by green reflectors on the rib) will be used, if possible. Secondary underground evacuation routes (identified by red reflectors on the rib) will be used if necessary (Figure D-5). Brass tags will be collected from personnel at the hoist collar on the surface, and taken to the Underground Controller, who functions as an Office Warden. When all brass tags are accounted for, underground accountability is reported to the RCRA Emergency Coordinator.

Upon reaching the surface, personnel will report to their on-site staging area to receive further instructions.

Members of the FLIRT and the MRT who may be underground, will evacuate the underground when an underground evacuation is called for. A reentry by the MRT will be performed according to 30 CFR 49 and MSHA regulations for reentry into a mine. The two MRTs are trained in compliance with 30 CFR 49 in mine mapping, mine gases, ventilation, exploration, mine fires, rescue, and recovery.

D-7e  Further Site Evacuation

In the event of an evacuation involving the need to transport employees, the following transportation will be available:

- Buses/vans—WIPP facility buses/vans will be available for evacuation of personnel. The buses/vans are stationed in the employee parking lot.

- Privately Owned Vehicles—Because many employees drive to work in their own vehicles, these vehicles may be utilized in an emergency. Personnel may be directed as to routes to be taken when leaving the facility.
These vehicles may be used to transport personnel who have been released from the site by the RCRA Emergency Coordinator.

D-8 Required Reports

The RCRA Emergency Coordinator, on behalf of the Permittees, will note in the operating record the time, date, and details of any incident that requires implementing this Contingency Plan. This notation will be in the facility log maintained by the CMRO. In compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.56(j)), within 15 days after the incident, the Permittees will ensure that a written report on the incident will be submitted to the EPA Region VI Administrator and to the Secretary of the NMED. The report will include:

- The name, address, and telephone number of the Owner/Operator
- The name, address, and telephone number of the facility
- The date, time, and type of incident (e.g., fire, explosion or release)
- The name and quantity of material(s) involved
- The extent of injuries, if any
- An assessment of actual or potential hazards to human health or the environment, where this is applicable
- The estimated quantity and disposition of recovered material that resulted from the incident

In addition to the above report, the Permittees will ensure that the ES&H Manager, or designee, submits reports to the appropriate agencies as listed in Tables D-8 and D-9.

In accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.56(i)), the Permittees will notify the Secretary of the NMED and EPA Region VI Administrator that the WIPP facility is in compliance with requirements for the cleanup of areas affected by the emergency and that emergency equipment used in the emergency response has been cleaned, repaired, or replaced and is fit for its intended use prior to the resumption of waste management operations in affected areas. The means the WIPP facility will use to meet these requirements are described in Sections D-4e, D-4f, D-4g, and D-4h.

The WIPP requires the EST/FPT to initiate the “WIPP Hazardous Materials Incident Report” if the Contingency Plan is implemented. A form is attached as Figure D-12. The form is initiated by the EST/FPT. The RCRA Emergency Coordinator, CMRO, and Environmental Compliance representatives complete their respective sections.

D-9 Location of the Contingency Plan and Plan Revision

The owner/operator of the WIPP facility will ensure that copies of this Contingency Plan are available to all emergency personnel and organizations described in Section D-2. When the Contingency Plan is revised, updated copies are manually distributed (electronically or via site mail) or hand delivered to applicable WIPP Facility emergency personnel and alternate...
Emergency Operations Center and Joint Information Center. In addition, the owner/operator will make copies available to the following outside agencies:

- Intrepid Potash NM LLC and Mosaic Potash Carlsbad Inc.
- Carlsbad Fire Department, Carlsbad
- Carlsbad Medical Center, Carlsbad
- Lea Regional Medical Center, Hobbs
- Otis Fire Department, Otis
- Hobbs Fire Department, Hobbs
- Joel Fire Department, Carlsbad
- BLM, Carlsbad
- New Mexico State Police

The owner/operator of the WIPP facility will ensure that this plan is reviewed annually and amended whenever:

- Applicable regulations are revised
- The RCRA Part B permit for the WIPP facility is revised in any way that would affect the Contingency Plan
- This plan fails in an emergency
- The WIPP facility design, construction, operation, maintenance, or other circumstances change in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous constituents or change the response necessary in an emergency
- The list of RCRA Emergency Coordinators change
- The list of WIPP facility emergency equipment changes.
References


### Table D-1
Hazardous Substances in Large Enough Quantities to Constitute a Level II Incident

<table>
<thead>
<tr>
<th>Chemical Description</th>
<th>Building Location</th>
<th>Hazard Category</th>
</tr>
</thead>
</table>
| Ethylene Glycol Solution - 35% | Buildings 411; 412; 451; 452; 486; 463; 474C; FAC 414 | Immediate (acute)  
Delayed (chronic) |
| Gasoline, Unleaded GASC0001 | FAC 480 | Fire  
Immediate (acute)  
Delayed (chronic) |
| No. 1 Diesel Fuel Oil GASC0210 | U/G Fuel Station; Oil Depot U/G; FACs 480, 255.1 & 255.2; Transport Tank; Building 456 | Fire  
Immediate (acute)  
Delayed (chronic) |
| Multiple containers of TRU Waste as described in Permit Section 3.3.1 | WHB Waste Shaft U/G | Delayed (chronic) |
| Hazardous materials in quantities that exceed 5 times the Reportable Quantity (Per DOE O 151.1) values as defined in 40 CFR 302 | It should be noted that WIPP is not expected to possess such quantities. | Fire  
Immediate (acute)  
Delayed (chronic) |
### Table D-2

**Resource Conservation and Recovery Act Emergency Coordinators**

<table>
<thead>
<tr>
<th>Name</th>
<th>Address*</th>
<th>Office Phone</th>
<th>Personal Phone*</th>
</tr>
</thead>
<tbody>
<tr>
<td>R. C. (Russ) Strob (primary)¹</td>
<td>234-8276 or 234-8554</td>
<td>234-8276 or 234-8916</td>
<td></td>
</tr>
<tr>
<td>J. E. (Joseph) Bealler²</td>
<td></td>
<td>234-8276 or 234-8916</td>
<td></td>
</tr>
<tr>
<td>M. G. (Mike) Proctor²</td>
<td></td>
<td>234-8276 or 234-8143</td>
<td></td>
</tr>
<tr>
<td>G. L. (Gary) Kessler²</td>
<td></td>
<td>234-8326</td>
<td></td>
</tr>
<tr>
<td>A. E. (Alvy) Williams¹ (primary)</td>
<td>234-8276 or 234-8216</td>
<td>234-8276 or 234-8216</td>
<td></td>
</tr>
<tr>
<td>P. J. (Paul) Paneral¹ (primary)</td>
<td></td>
<td>234-8498</td>
<td></td>
</tr>
<tr>
<td>J. R. (Joel) Howard²</td>
<td></td>
<td>234-8325</td>
<td></td>
</tr>
<tr>
<td>M. L. (Mark) Long¹ (primary)</td>
<td></td>
<td>234-8170</td>
<td></td>
</tr>
<tr>
<td>A.C (Andy) Cooper²</td>
<td></td>
<td>234-8197</td>
<td></td>
</tr>
</tbody>
</table>

* NOTE: Personal information (home addresses and personal phone numbers) has been removed from informational copies of this Permit.

¹ The on-duty Facility Shift Manager is the primary RCRA Emergency Coordinator pursuant to 20.4.1.500 NMAC (incorporating 40 CFR §264.52), and is designated to serve as the RCRA Emergency Coordinator.

² The on-duty Facility Operations Engineer is the alternate RCRA Emergency Coordinator and is available as needed.
<table>
<thead>
<tr>
<th>Incident Condition</th>
<th>Incident Level</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>I</td>
</tr>
<tr>
<td>Product identifications</td>
<td>Placard not required, NFPA 0 or 1 all categories, all Other Regulated</td>
</tr>
<tr>
<td></td>
<td>Materials A, B, C, and D.</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Container size</td>
<td>Container size does not impact this incident level.</td>
</tr>
<tr>
<td>Fire/explosion potential</td>
<td>Under control.</td>
</tr>
<tr>
<td>Leak severity</td>
<td>No release or small release contained or confined with readily available</td>
</tr>
<tr>
<td></td>
<td>resources.</td>
</tr>
<tr>
<td>Life safety</td>
<td>No life-threatening situation from materials involved.</td>
</tr>
<tr>
<td>Environmental impact (Potential)</td>
<td>None.</td>
</tr>
<tr>
<td>Container integrity</td>
<td>Not damaged.</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Contingency Plan is implemented
<table>
<thead>
<tr>
<th>Method</th>
<th>Chemical</th>
<th>Radiological</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Liquid</td>
<td>Solid</td>
</tr>
<tr>
<td>Absorption</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Covering</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Dikes, diversions</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Overpack</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Plug/patch</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Transfer</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Vapor suppression</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>
### Table D-5
Chemical Methods of Mitigation

<table>
<thead>
<tr>
<th>Method</th>
<th>Chemical</th>
<th>Radiological</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Liquid</td>
<td>Solid</td>
</tr>
<tr>
<td>Neutralization</td>
<td>Yes</td>
<td>Yes&lt;sup&gt;(1)&lt;/sup&gt;</td>
</tr>
<tr>
<td>Solidification</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

(1) When solid neutralizing agents are used, they will be used simultaneously with water.

(2) This method could be utilized for mitigation of firewater involving TRU-waste.
<table>
<thead>
<tr>
<th>Equipment</th>
<th>Description and Capabilities</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building Fire Alarms</td>
<td>Manual pull stations and automatic devices (sprinkler system flow, and smoke and thermal detectors) trigger fire alarm; locally visible and audible; visual display and alarm in Central Monitoring Room (CMR)</td>
<td>Guard and Security Building, Pumphouse, Warehouse/Shops, Exhaust Filter Building, Support Building, CMR/Computer Room, Waste Handling Building, TRUPACT Maintenance Facility, SH Hoisthouse, Maintenance Shops, Guard Shack*, Auxiliary Warehouse, Core Storage Building, Engineering Building, Training Facility, Safety Building, Maintenance Shop, Hazardous Waste Storage (non-TRU) Area (Facility 474) *local alarms; not connected to the CMR</td>
</tr>
<tr>
<td>Underground Fire Alarms</td>
<td>Automatic/Manual; have priority over other paging channel signals but not override intercom channels; alarms sound in the general area of the control panel and are connected to the underground evacuation alarms, they also interface with the CMR.</td>
<td>Fire detection and control panel locations: Waste Shaft Underground Station, SH Shaft Underground Station, Between E-140 and E-300 in S-2180 Drift, E-O/N-1200, Fuel Station</td>
</tr>
<tr>
<td>Site-wide Evacuation Alarm</td>
<td>Transmitted over paging channel of the public address system, overriding its normal use; manually initiated according to procedures requiring evacuation; audible alarm produced by tone generator at 10 decibels above ambient noise level (or at least 75 decibels); flashing strobe lights; radios and/or pagers are used to notify facility personnel outside alarm range. Monthly test are performed on the PA, site notification alarms, and electrom</td>
<td>Site-wide</td>
</tr>
<tr>
<td>Vehicle Siren</td>
<td>Manual, oscillating; emergency services/surface response vehicles, is mechanical and electronic.</td>
<td>WIPP surface emergency vehicles</td>
</tr>
<tr>
<td>Public Address System</td>
<td>Includes intercom phones; handset stations and loudspeaker assemblies, each with own amplifiers; multichannel, one for public address and pages, and others for independent party lines.</td>
<td>Surface and underground</td>
</tr>
<tr>
<td>Inplant Phones</td>
<td>Private automatic branch exchange; direct dial; provide communication link between surface and underground operations</td>
<td>Throughout surface and underground</td>
</tr>
</tbody>
</table>

---
<table>
<thead>
<tr>
<th>Equipment</th>
<th>Description and Capabilities</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mine Page Phones</td>
<td>Battery-operated paging system</td>
<td>CMR, Mine Rescue Room, EOC, lamproom, underground at S550/W30, S100/W30, S1950/E140, SH Shaft Collar and Underground Station, Waste Shaft Collar and Underground Station, FSM desk, EST Station</td>
</tr>
<tr>
<td>Emergency Pagers</td>
<td>Manual, intermittent alarm signals</td>
<td>Issued to appropriate emergency personnel</td>
</tr>
<tr>
<td>Plectrons</td>
<td>Tone-alert radio receivers placed in areas not accessible by the public address system</td>
<td>Site-wide</td>
</tr>
<tr>
<td>Portable Radios</td>
<td>Two-way, portable; transmits and monitors information to/from other transmitters</td>
<td>Issued to individuals</td>
</tr>
<tr>
<td>Plant Base Radios</td>
<td>Two-way, stationary, VHF-FM; linked to Eddy County Sheriff Department, NM State Police, and Otis Fire Department, and WIPP Channels 1-18 (Communication with the Lea County Sheriff's Department, the Hobbs Fire Department, Carlsbad Medical Center and Lea Regional Hospital is available via the Eddy County dispatch) (Site Security, Site Operations and Site Emergency, maintenance, repeater to Carlsbad). Wireless communications such as cellular phones may be used to contact the Eddy County emergency responders.</td>
<td>Various site locations</td>
</tr>
<tr>
<td>Mobile Phones</td>
<td>Provide communications link between WIPP Security and key personnel</td>
<td>Issued to individuals plus emergency vehicles,</td>
</tr>
</tbody>
</table>

### Spill Response

**SPILL-X S Guns and Recharge Powder**
- Containment;
  - (1) SPILL-X model SC-30-C (Gun)
  - (1) SPILL-X model XC-30-S (Gun)
  - (1) SPILL-X model SC-30-A (Gun);
  - (1) A-Acid, 5 gallon bucket (Recharge Powder)
  - (1) S-Solvent, 5 gallon bucket (Recharge Powder)
  - (1) C-Caustic, 5 gallon bucket (Recharge Powder)

**Absorbent Sheets**
- Containment or cleanup;
  - (1) 3' x 100’ Sheet

**Absorbents**
- Grab and Go container; spill control bucket;
  - (1) for solvents and neutralizing absorbents; 5 gallon bucket
  - (1) for acids/caustics; 5 gallon bucket

**Absorbent Material**
- Containment or cleanup;
  - (1) 100 ft. rolled or equivalent socks “Pig” for general liquid
  - (1) 100 ft. rolled or equivalent socks “Pig” for oil

HAZMAT trailer
<table>
<thead>
<tr>
<th>Equipment</th>
<th>Description and Capabilities</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Bag System</td>
<td>Extrication, Stabilization, Cribbing&lt;br&gt;(1) bag system with tank kit and the following bag sizes:&lt;br&gt;(1) 12-ton,&lt;br&gt;(1) 21.8-ton,&lt;br&gt;(1) 17-ton</td>
<td>Surface rescue truck</td>
</tr>
<tr>
<td>Air Chisel</td>
<td>Extrication&lt;br&gt;(1) Capable of cutting 3/16&quot; steel</td>
<td>Surface rescue truck</td>
</tr>
<tr>
<td>Drum Transfer Pumps and Drum Opener</td>
<td>Containment or cleanup;&lt;br&gt;(1) unit for chemical transfer&lt;br&gt;(1) hand operated pump for petroleum transfer&lt;br&gt;(1) drum opener</td>
<td>HAZMAT trailer</td>
</tr>
<tr>
<td>Floor Squeegee</td>
<td>Containment or cleanup;&lt;br&gt;(1) straight rubber blade, nonwood handle</td>
<td>HAZMAT trailer</td>
</tr>
<tr>
<td>Foam Concentrate</td>
<td>AFFF 6%&lt;br&gt;(4) 5-gallon pail</td>
<td>Fire truck # 1</td>
</tr>
<tr>
<td>Gas Cylinder Leak Control Kit</td>
<td>(1) Series A Hazardous Material Response Kit; contains nonsparking equipment to control and plug leaks</td>
<td>HAZMAT trailer</td>
</tr>
<tr>
<td>Portable Generator</td>
<td>(1) Backup power; 5,000 watt; 120 or 240 volt</td>
<td>Surface rescue truck</td>
</tr>
<tr>
<td>Equipment</td>
<td>Description and Capabilities</td>
<td>Location</td>
</tr>
<tr>
<td>--------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>Hand Tools</td>
<td>Containment and cleanup; Underground rescue truck: (1) 12# Sledge Hammer (1) 3/8&quot; Drive Socket Set (1) ½&quot; Drive Socket Set (1) 3/4&quot; Drive Socket Set (1) 25' ½&quot; Chain (1) 8' Wrecking Bar (1) Bottle Jack (1) 4# Hammer (1) 18&quot; Crescent Wrench (1) 15' Pry Bar (1) 2' Pry Bar (1) 100' Extension Cord (1) 4' Nylon Sling (1) 8' Nylon Sling (1) 10' Nylon Sling These tools are located in the HAZMAT Trailer. They are non-sparking. (1) 14&quot;L adjustable pipe wrench (1) 15&quot; multi-opening bung wrench (1) hammer/crate opener (1) 8&quot; pipe pliers (1) 8&quot; blade Phillips (1) #2 screwdriver (1) 8&quot; blade standard screwdriver (1) Claw Hammer</td>
<td>Underground rescue truck, HAZMAT trailer</td>
</tr>
<tr>
<td>Come-a-longs</td>
<td>(1) 4-ton; cable-type Ratchet lever tool designed specifically for lifting, lowering and pulling applications including jobs requiring rigging, positioning, and stretching. Used in rescue for extrication.</td>
<td>Surface rescue truck and underground rescue truck</td>
</tr>
<tr>
<td>Porta-power</td>
<td>(1) 10-ton hydraulic, hand-powered jaws used for extrication during rescues.</td>
<td>Surface rescue truck</td>
</tr>
<tr>
<td>Jugs</td>
<td>Containment or cleanup; (4) 1-gallon plastic</td>
<td>HAZMAT trailer</td>
</tr>
<tr>
<td>Pails</td>
<td>Containment or cleanup; (3) 5-gallon plastic with lid</td>
<td>HAZMAT trailer</td>
</tr>
<tr>
<td>Portable Lighting</td>
<td>(1) Emergency lighting system; 120 volts; 500-watt bulbs, suitable for wet location</td>
<td>Underground rescue truck</td>
</tr>
<tr>
<td>Patching Kit</td>
<td>Series A Hazardous Response Kit; Class A; contains nonsparking equipment to control and plug leaks,</td>
<td>HAZMAT trailer</td>
</tr>
<tr>
<td>Scoops and Shovels</td>
<td>Cleanup; plastic; various sizes; nonsparking; nonwood handles (1) Scoop (3) Shovels</td>
<td>HAZMAT trailer</td>
</tr>
<tr>
<td>Equipment</td>
<td>Description and Capabilities</td>
<td>Location</td>
</tr>
<tr>
<td>-----------</td>
<td>-----------------------------</td>
<td>---------</td>
</tr>
<tr>
<td><strong>Medical Resources</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ambulance #1</td>
<td>Equipped as per Federal Specifications KKK-A-1822 and New Mexico Emergency Medical Services Act General Order 35; equipped with a radio to Carlsbad Medical Center, VHF radio, UHF medical frequency, cellular phone</td>
<td>Surface (Safety and Emergency Services Facility)</td>
</tr>
<tr>
<td>Ambulance #2</td>
<td>Diesel and/or electric ambulance equipped with first aid kit, 2 stretchers, and other associated medical supplies</td>
<td>Underground</td>
</tr>
<tr>
<td>Ambulance #3 a</td>
<td>Diesel and/or electric ambulance equipped with first aid kit, rescue basket, oxygen, cardiac monitor and other associated medical supplies</td>
<td>Underground</td>
</tr>
<tr>
<td>Rescue Truck #1</td>
<td>Special purpose vehicle; light and heavy duty rescue equipment; transports 1 litter patient, medical oxygen and supplies for mass casualties, fire suppression support equipment (rescue tool, air bag, K-12 Rescue Saw, 5,000-watt generator, self-contained breathing apparatus (SCBA), and much more equipment</td>
<td>Surface (Safety and Emergency Services Facility)</td>
</tr>
<tr>
<td><strong>Fire Detection and Fire Suppression Equipment</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building Smoke, Thermal Detectors, or Manual Pull Stations</td>
<td>Ionization and photoelectric or fixed temperature/rate of rise detectors; visual display and alarm in CMR; manual pull stations. The underground has manual fire alarm pull stations located where personnel have access when evacuating. These are connected to the U/G evacuation alarm.</td>
<td>Guard and Security Building, Warehouse/Shops, Support Building, CMR/Computer Room, Waste Handling Building, TRUPACT Maintenance Facility, Waste Shaft Collar, Underground Fuel Station, SH Holzthouse, Engineering Building, Industrial Safety Building, Training Facility</td>
</tr>
<tr>
<td>Fire Truck #1</td>
<td>Equipped per Class &quot;A&quot; fire truck per NFPA; capacity 750 gallons, with pump capacity of 1200 gallons per minute</td>
<td>Surface (Safety and Emergency Services Facility)</td>
</tr>
<tr>
<td>Fire Truck #2</td>
<td>Equipped per Class &quot;A&quot; fire truck per NFPA; capacity 1500 gallons, with pump capacity rated for 1250 gallons per minute</td>
<td>Surface (Safety and Emergency Services Facility)</td>
</tr>
<tr>
<td>Rescue Truck #2 (U/G)</td>
<td>(1) 125-pound dry chemical extinguisher (1) 150-pound foam extinguisher</td>
<td>Underground</td>
</tr>
<tr>
<td>Rescue Truck #3 a (U/G)</td>
<td>(1) 125-pound dry chemical extinguisher (1) 33-gallon foam extinguisher</td>
<td>Underground</td>
</tr>
<tr>
<td>Underground Fire a Suppression Vehicles</td>
<td>(1) 125-pound dry chemical extinguisher (1) 33-gallon foam extinguisher</td>
<td>Underground</td>
</tr>
<tr>
<td>Extinguishers</td>
<td>Individual fire extinguisher stations; various types located throughout the facility, conforming to NFPA-10.</td>
<td>Buildings, underground, and underground vehicles</td>
</tr>
<tr>
<td>Automatic Dry Chemical Extinguishing Systems</td>
<td>Automatic; 1,000-pound system (Dry Chemical); actuated by thermal detectors or by manual pull stations</td>
<td>Underground fuel station</td>
</tr>
<tr>
<td>Equipment</td>
<td>Description and Capabilities</td>
<td>Location</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Sprinkler Systems</td>
<td>Fire alarms activated by water flow</td>
<td>Pumphouse, Guard and Security Building, Support Building, Waste Handling Building (contact-transuranic waste area only), Warehouse/Shops Building, Auxiliary Warehouse Building, TRUPACT Maintenance Facility, Training Facility, SH Shaft Hoisthouse, Exhaust Filter Building, Engineering Building, and Safety Building</td>
</tr>
<tr>
<td>Water Tanks, Hydrants</td>
<td>Fire suppression water supply; one 180,000-gallon capacity tank, plus a second tank with 100,000 gallon reserve</td>
<td>Tanks are at southwestern edge of WIPP facility, pipelines and hydrants are throughout the surface</td>
</tr>
<tr>
<td>Fire Water Pumps</td>
<td>Fire suppression water supply; pumps are rated at 125 pounds per square inch, 1,500 gallons per minute centrifugal pump, one with electric motor drive, the other with diesel engine; pressure maintenance pump</td>
<td>Pumphouse</td>
</tr>
</tbody>
</table>

**Personal Protection Equipment**

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Description</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Headlamps</td>
<td>Mounted on hard hat; battery operated</td>
<td>Each person underground</td>
</tr>
<tr>
<td>Underground Self-Rescuer Units</td>
<td>Short-term rebreathers; approximately 300</td>
<td>Each person underground</td>
</tr>
<tr>
<td>Self-Contained Self-Rescuer</td>
<td>At least 60 minutes of oxygen available. Approximately 400 units cached throughout the underground</td>
<td>Cached throughout the underground</td>
</tr>
<tr>
<td>Self-Contained Breathing Apparatus (SCBA)</td>
<td>Oxygen supply; 4-hour units; approximately 14 Mine Rescue Team Draeger units</td>
<td>Mine Rescue Training Room</td>
</tr>
<tr>
<td>Chemical and Chemical-Supported Gloves</td>
<td>Body protection; (12 pair) inner-cloth, (12 pair) outer-pvc, (5 pair) outer-viton</td>
<td>HAZMAT trailer</td>
</tr>
<tr>
<td>Suit, Acid</td>
<td>Body protection; (4) acid</td>
<td>HAZMAT trailer</td>
</tr>
<tr>
<td>Suit, Fully Encapsulated</td>
<td>Body protection; used with SCBAs; full outerboot; (4) Level A; (4) Level B</td>
<td>HAZMAT trailer</td>
</tr>
</tbody>
</table>

**Emergency Medical Equipment**

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Description</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antishock Trousers</td>
<td>Shock treatment; (2) inflatable, one on each ambulance</td>
<td>Ambulance # 1 and # 2</td>
</tr>
<tr>
<td>Heart Monitor and Defibrillator</td>
<td>Heart Monitor/defibrillator</td>
<td>Ambulance # 1 and # 2</td>
</tr>
<tr>
<td>Equipment</td>
<td>Description and Capabilities</td>
<td>Location</td>
</tr>
<tr>
<td>-------------------</td>
<td>-----------------------------------------------------------------------------------------------</td>
<td>---------------------------------------------</td>
</tr>
</tbody>
</table>
| Oxygen            | Patient care;  
|                   | Size D:  
|                   | (2) Ambulance #1  
|                   | (1) Underground Ambulance  
|                   | (1) Health Services  
|                   | Size E:  
|                   | (1) Rescue Truck  
|                   | (2) Underground Ambulance  
|                   | Size M:  
|                   | (1) Ambulance #1  
|                   | Ambulance #1 and #2, surface rescue truck                                                    |
| Resuscitators (Bag) | Disposable bag resuscitation  
|                   | Ambulance #1:  
|                   | (2) adult size  
|                   | (1) child size  
|                   | Underground Ambulance:  
|                   | (2) adult size  
|                   | Ambulance #1, Ambulance #2                                                                  |
| Splints           | Immobilize limbs;  
|                   | (1) Adult traction splint, lower extremity, with limb-supporting slings, padded ankle hitch and traction device per ambulance.  
|                   | (2) Rigid splinting devices or equivalents, suitable for immobilization of upper extremities per ambulance.  
|                   | (2) Rigid splinting devices or equivalents, suitable for the immobilization of lower extremities.  
|                   | (1) Set of Airsplints;  
|                   | 6 assorted splints; hand/wrist, half arm, full arm, foot/ankle, half leg, and full leg per miner's aid stations.  
|                   | Ambulance #1 and #2, Miner's Aid Stations                                                    |
| Stretchers        | Patient transport;  
|                   | (2) Spine Boards, one short and one long, with nylon straps per ambulance. (also used to perform cardiopulmonary resuscitation)  
|                   | (2) Emergency Stretchers or scoops, or combination per ambulance  
|                   | (1) All-purpose multi-level ambulance stretch (gurney), with 3 safety straps and locking mechanism per ambulance.  
|                   | (1) Stretcher in each miner's aid station.                                                    
|                   | Various combinations in Ambulance #1 and #2, Miner's Aid Station                             |
| Suctions          | For medical emergencies:  
|                   | Portable  
|                   | (1) Suction unit, capable of delivering at least 300 mm. HG on each ambulance.                
<p>|                   | Ambulances #1 and #2                                                                         |</p>
<table>
<thead>
<tr>
<th>Equipment</th>
<th>Description and Capabilities</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trauma Kits</td>
<td>(1) adult blood pressure cuff and stethoscope</td>
<td>(1) kit in each:</td>
</tr>
<tr>
<td></td>
<td>(4) soft-roller bandages</td>
<td>Ambulances #1 and #2,</td>
</tr>
<tr>
<td></td>
<td>(3) triangular bandages</td>
<td>surface rescue truck</td>
</tr>
<tr>
<td></td>
<td>(1) pkg. band-aids</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(2) trauma dressings</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(25) 4X4 sponges</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) roll adhesive tape</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) bite stick</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) penlight</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) sterile burn sheet</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) oropharyngeal airway</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) glucose substance</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(2) sterile gauze dressings</td>
<td></td>
</tr>
<tr>
<td>Miner's Aid Station</td>
<td>For First Aid Stations in the Underground</td>
<td>Miner's Aid Stations - Various</td>
</tr>
<tr>
<td></td>
<td>(1) Stretcher--as referenced above per station</td>
<td>Underground Locations</td>
</tr>
<tr>
<td></td>
<td>(1) Set of airsplints--as referenced above per station</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) Blanket per station</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) Box of latex gloves (50) per station</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(5) Pathogen Wipes per station</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) First Aid Kit (24) per station; includes,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(3) Band-Aid Combo Paks</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(2) Swabs, PVP</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) Antibiotic Ointment</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) Sting-Kill Swab</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(2) Dressing, compresses</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(2) Roller Bandages</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(2) Tape</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(2) Triangle Bandage</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) Eyedressing Pak</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) Burn Dressing</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) Ammonia Inhalants</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(1) User Log Sheet</td>
<td></td>
</tr>
<tr>
<td>Equipment</td>
<td>Description and Capabilities</td>
<td>Location</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------------</td>
</tr>
</tbody>
</table>
| First Aid Supplies                | According to General Order #35  
(12) bandages, soft roller, self-adhering type—4” or 6” x 5 yards.  
(6) triangular bandages, 40”  
(1) box band-aids  
(1) 1 pair bandage shears  
(6) Trauma dressings, 30” x 10”  
(6) Trauma dressings, 5” x 7”  
(50) 4” x 4” sponges, individually wrapped and sterile  
(2) rolls adhesive tape  
(1) penlight  
(2) sterile burn sheets  
(2) oropharyngeal airways — adult  
(2) oropharyngeal airways — child (Ambulance #1 only)  
(2) oropharyngeal airways — infant (Ambulance #1 only)  
(1) Glucose substance  
(3) Occlusive dressings  
(1) Roll aluminum foil  
(6) Rigid cervical collars—2 each small, medium and large sizes  
(4) Cold packs  
(4) Heat packs  
(2) Bite sticks | Ambulance #1                                                              |
| First Aid Supplies                | (2) Transfer sheets  
(2) Blankets                                                                                                                                                                                                                   | Ambulances #1 and #2        |
| First Aid Supplies                | (2) #16g angiosets  
(2) #18g angiosets  
(2) #20g angiosets  
(1) 1000cc LR IV fluid  
(1) 500cc NS IV fluid | Ambulances #1 and #2, surface rescue truck |
<p>| Emergency Lighting                | For employee rescue and evacuation, and fire/spill containment; linked to main power supply, and selectively linked to back up diesel power supply and/or battery-backed power supply | Surface and underground    |
| Backup Power Sources             | Two diesel generators, and battery-powered uninterruptible power supply (UPS); use limited to essential loads; manual or remote starting 1,100-kilowatt diesel generators with on-site fuel for 62% load for 3 days for selected loads; 30-minute battery capacity for essential loads | Generators are east of Safety and Emergency Services Building; UPS is located at the essential loads |
| Hoists                            | Hoists in Waste Shaft, Air Intake Shaft, and SH Shaft | Waste Shaft, Air Intake Shaft, SH Shaft |
| Radiation Monitoring Equipment    | (5) Portable alpha and beta survey meters, portable air samplers, and portable continuous air monitors | Building 412               |
| Emergency Shower                 | For emergency flushing of chemical contact or injury                                                                       | Surface                   |</p>
<table>
<thead>
<tr>
<th>Equipment</th>
<th>Description and Capabilities</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eye Wash Fountains</td>
<td>For emergency flushing of affected eyes</td>
<td>Various locations on surface and in the underground</td>
</tr>
<tr>
<td>Decon Shower Equipment</td>
<td>Self-contained decon shower trailer, portable decon shower unit</td>
<td>Surface</td>
</tr>
<tr>
<td>Overpack containers</td>
<td>14-85 Gallon drums, 4-SWBs, 1-TDOP</td>
<td>Building 481</td>
</tr>
<tr>
<td>HEPA Vacuums</td>
<td>2 HEPA Vacuums to be utilized for removal of contamination.</td>
<td>Building 481</td>
</tr>
<tr>
<td>Aquaset or Cement</td>
<td>100 lbs. of aquaset or cement material for solidification of liquid waste generated as a result of fire fighting water or decontamination solutions.</td>
<td>Building 481</td>
</tr>
<tr>
<td>Paint or Fixative</td>
<td>1 - 5 gallon bucket of approved fixative to be used during recovery.</td>
<td>Building 481</td>
</tr>
<tr>
<td>TDOP Upender</td>
<td>Upender facilitates overpacking standard waste boxes</td>
<td>Building 481</td>
</tr>
<tr>
<td>Non hazardous Decontaminating Agents</td>
<td>4-1 Gallon bottles for decontamination of surfaces, equipment, and personnel</td>
<td>Building 481</td>
</tr>
</tbody>
</table>

1 "The NMED will be notified when new equipment is brought on line in calendar year 2015."
Table D-7
Types of Fire Suppression Systems by Location

<table>
<thead>
<tr>
<th>Location</th>
<th>AS</th>
<th>AD</th>
<th>MPS</th>
<th>PFE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste Handling Building</td>
<td>*</td>
<td></td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>Support Building</td>
<td>*</td>
<td></td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>Exhaust Filter Building</td>
<td>*</td>
<td></td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>Water Pumphouse</td>
<td>*</td>
<td></td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>Underground Support Areas</td>
<td></td>
<td></td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>(also has rescue truck)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(as illustrated in Figure D-5)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Station A Effluent Monitoring Shed</td>
<td></td>
<td></td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>Station B Effluent Monitoring Shed</td>
<td></td>
<td></td>
<td>*</td>
<td>*</td>
</tr>
</tbody>
</table>

(1) Symbols for WIPP fire-protection systems:
- **AS** = Automatic Wet Pipe Sprinkler System
- **AD** = Automatic Dry Chemical Extinguishing System
- **MPS** = Manual Pull Stations
- **PFE** = Portable Fire Extinguishers

(2) The Waste Handling Building and the Support Building contain the following:
- Automatic wet pipe sprinklers
- Fire detection in the heating, ventilation, and air conditioning instrumentation (Support Building, only)
- Manual pull stations
- Portable fire extinguishers
- Automatic detectors

The Safety and Emergency Services Building contains the following:
- Automatic wet pipe sprinklers
- Manual pull stations
- Portable fire extinguishers
- Automatic detectors

The Core Storage Building contains the following:
- Automatic wet pipe sprinklers
- Portable fire extinguishers

(3) The Exhaust Filter Building, Underground Facilities, Warehouse/Shops Building, Water Pumphouse, and Salt Handling Hoist house also have portable fire extinguishers, manual pull stations, and automatic detectors.
<table>
<thead>
<tr>
<th>Statute</th>
<th>Chemical Releases Covered</th>
<th>To Whom Report Will Be Made</th>
<th>What Will Be Reported</th>
<th>Immediately (Oral)</th>
<th>Subsequently (Written)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)/Superfund Amendments and Reauthorization Act (SARA) (40 CFR Part 302)</td>
<td>&quot;Reportable quantities&quot; of CERCLA/SARA &quot;hazardous substances.&quot;</td>
<td>National Response Center: (800) 424-8802, State Emergency Response Commission (SERC); and the State of New Mexico Homeland Security and Emergency Management via the District 3, DPS Dispatch Center (575) 622-7200 Eddy County Emergency Manager via the Eddy County Regional Dispatch Authority (575) 616-7155 Lea County Emergency Manager via the Lea County Emergency Communications Authority (575) 397-9265</td>
<td>1) Chemical identification; 2) what hazardous substance; 3) quantity released; 4) time, location and duration of release; 5) media of release; 6) health risks and medical advice; 7) proper precautions (e.g., evacuation); and 8) name and phone number of reporter and facility.</td>
<td>As soon as practicable, update of oral notice and response action taken. Send report to: New Mexico State Emergency Response Commission, Department of Homeland Security and Emergency Management, P.O. Box 2711, Santa Fe, New Mexico, 87502, and Eddy County Emergency Manager, 324 S. Canyon Street, Suite B, Carlsbad, New Mexico 88220 and Lea County Emergency Manager, 1923 Dal Paso, Suite A, Hobbs New Mexico, 88240. National Response Center will contact the U.S. Environmental Protection Agency (EPA). EPA may request a written report.</td>
<td></td>
</tr>
<tr>
<td>Emergency Planning and Community Right-to-Know Act (SARA Title III) (40 CFR Parts 302 and 355)</td>
<td>SARA Title III &quot;extremely hazardous substances.&quot;</td>
<td>National Response Center: (800) 424-8802, State Emergency Response Commission: and the State of New Mexico Homeland Security and Emergency Management via the District 3, DPS Dispatch Center (575) 622-7200 Eddy County Emergency Manager via the Eddy County Regional Dispatch Authority (575) 616-7155 Lea County Emergency Manager via the Lea County Emergency Communications Authority (575) 397-9265</td>
<td>1) Chemical identification; 2) what extremely hazardous substance; 3) quantity released; 4) time, location and duration of release; 5) media of release; 6) health risks and medical advice; 7) proper precautions (e.g., evacuation); and 8) name and phone number of reporter and facility.</td>
<td>As soon as practicable, update of oral notice and response action taken. Send report to: New Mexico State Emergency Response Commission, Department of Homeland Security and Emergency Management, P.O. Box 2711, Santa Fe, New Mexico, 87502, and Eddy County Emergency Manager, 324 S. Canyon Street, Suite B, Carlsbad, New Mexico 88220and Lea County Emergency Manager, 1923 Dal Paso, Suite A, Hobbs New Mexico, 88240. National Response Center will contact the U.S. Environmental Protection Agency (EPA) for an address if a written report is requested by EPA.</td>
<td></td>
</tr>
<tr>
<td>Statute</td>
<td>Chemical Releases Covered</td>
<td>To Whom Report Will Be Made</td>
<td>What Will Be Reported</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------</td>
<td>--------------------------</td>
<td>-----------------------------</td>
<td>----------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resource Conservation and Recovery Act (RCRA), 40 CFR §§264.56(a) and 265.56(a)</td>
<td>Any imminent or actual emergency situation.</td>
<td>State or local agencies with designated response roles, if their help is needed: State of New Mexico Homeland Security and Emergency Management via the District 3, DPS Dispatch Center (575) 622-7200 Eddy County Regional Dispatch Authority (575) 616-7155 City of Carlsbad Emergency Dispatch Center (575) 885-2111 Lea County Emergency Communications Authority (575) 397-9265</td>
<td>What assistance is required.</td>
<td>Not Applicable (NA)</td>
<td></td>
</tr>
<tr>
<td>RCRA, 40 CFR §§264.56(d), 264.56(i), 265.56(d), and 265.56(i)</td>
<td>RCRA “hazardous waste” release, fire, or explosion, which could threaten human health or environment outside the facility.</td>
<td>National Response Center: (800) 424-8802 State Emergency Response Commission and the State of New Mexico Homeland Security and Emergency Management via the District 3, DPS Dispatch Center (575) 622-7200</td>
<td>(1) Name and telephone number of reporter; (2) name and telephone number of facility; (3) time and type of incident; (4) name and quantity of materials involved; (5) extent of injuries, if any; and (6) possible health or environmental hazards outside the facility.</td>
<td>Prior to resumption of operations, notify that: (1) no waste that may be incompatible with released material is treated, stored, or disposed of until cleanup is complete, and (2) all emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use. Send to Secretary, New Mexico Environment Department, P.O. Box 26110, Santa Fe, New Mexico, 87502.</td>
<td></td>
</tr>
<tr>
<td>Statute</td>
<td>Chemical Releases Covered</td>
<td>To Whom Report Will Be Made</td>
<td>What Will Be Reported</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------------</td>
<td>---------------------------</td>
<td>----------------------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RCRA, 40 CFR §§264.56(i), 264.56(j), 265.56(i), and 265.56(j)</td>
<td>Any incident which triggers implementation of Contingency Plan.</td>
<td>New Mexico Environment Department, Emergency Response Office, 24-hour telephone: (505) 827-9329 (emergencies); for non-emergencies contact (866) 428-6535 (24 hour voice mail) or Monday to Friday, 8 am to 5 pm: (505) 476-5000.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>NA</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Within 15 days: 1) name, address and telephone number of owner/operator; 2) name, address and telephone number of facility; 3) date, time and type of incident (e.g. fire, explosion); 4) name and quantity of materials involved; 5) extent of injuries, if any; 6) possible hazards to human health or the environment; 7) estimated quantity of material that resulted from the incident. Prior to resumption of operations, notify that: 1) no waste that may be incompatible with released material is treated, stored, or disposed of until cleanup is complete, and 2) all emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use. Send to Secretary, New Mexico Environment Department, P.O. Box 26110, Santa Fe, New Mexico, 87502.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Regulations</td>
<td>Chemical Releases Covered</td>
<td>To Whom Report Will Be Made</td>
<td>What Will Be Reported</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>--------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>20.4.1.500 and 600 NMAC</td>
<td>RCRA “hazardous waste” releases, fire, or explosion, which could threaten human health or environment outside the facility.</td>
<td>National Response Center: (800) 424-8302, State Emergency Response Commission; and the State of New Mexico Homeland Security and Emergency Management via the District 3, DPS Dispatch Center (575) 622-7200</td>
<td>1) Name and telephone number of reporter; 2) name and telephone number of facility; 3) time and type of incident; 4) name and quantity of material involved; 5) extent of injuries, if any; and 6) possible health or environmental hazards outside the facility. Prior to resumption of operations, notify that: 1) no waste that may be incompatible with released material is treated, stored, or disposed of until cleanup is complete, and 2) all emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use. Send to Secretary, New Mexico Environment Department, P.O. Box 26110, Santa Fe, New Mexico, 87502.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>20.4.1.500 and 600 NMAC</td>
<td>Any incident which triggers implementation of Contingency Plan.</td>
<td>New Mexico Environment Department, Emergency Response Office, 24-hour telephone: (505) 827-9329 (emergencies); for non-emergencies contact (866) 428-6535 (24 hour voice mail) or Monday to Friday, 8 am to 5 pm: (505) 476-6000</td>
<td>1) Name and telephone number of reporter; 2) name and address of facility; 3) name and quantity of materials involved, to extent known; 4) extent of injuries, if any; and 5) possible hazards to human health or the environment, outside the facility. Within 15 days: 1) name, address and telephone number of owner/operator; 2) name, address and telephone number of facility; 3) date, time and type of incident (e.g., fire, explosion); 4) name and quantity of materials involved; 5) extent of injuries, if any; 6) possible hazards to human health or the environment; and 7) estimated quantity of material that resulted from the incident. Prior to resumption of operations, notify that: 1) no waste that may be incompatible with released material is treated, stored or disposed of until cleanup is complete, and 2) all emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use. Send to Secretary, New Mexico Environment Department, P.O. Box 26110, Santa Fe, New Mexico, 87502.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Regulations</td>
<td>Chemical Releases Covered</td>
<td>To Whom Report Will Be Made</td>
<td>What Will Be Reported</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------</td>
<td>---------------------------</td>
<td>----------------------------</td>
<td>----------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>New Mexico Emergency Management Act, Section 74-6B-5</td>
<td>Any accident (spill) involving hazardous materials (including hazardous substances, radioactive substances, or a combination thereof) which may endanger human health or the environment.</td>
<td>New Mexico Environment Department, Monday to Friday 8 am to 5 pm: (505) 478-6000, after business hours call: (505) 827-9329, State Emergency Response Commission, and the State of New Mexico Homeland Security and Emergency Management via the District 3, DPS Dispatch Center (575) 622-7200 Eddy County Emergency Manager via the Eddy County Regional Dispatch Authority (575) 616-7155. Lea County Emergency Manager: (575) 605-6561, and New Mexico Department of Public Safety (505) 554-7565.</td>
<td>1) Name, address and telephone number of owner or operator; 2) name, address and telephone number of facility; 3) date, time and type of incident; 4) name and quantity of material(s) involved; 5) extent of any injuries; 6) assessment of actual or potential threat to environment or human health; and 7) estimated quantity and disposition of recovered material. Written submission within one week of time permittees become aware of discharge. Same as oral and description of noncompliance and its cause, the period of noncompliance including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence. Send reports to New Mexico Environment Department, Chief, Ground Water Quality Bureau, P.O. Box 26110, Santa Fe, New Mexico, 87502, New Mexico State Emergency Response Commission, Homeland Security and Emergency Management, P.O. Box 27111, Santa Fe, New Mexico, 87502, and Eddy County Emergency Manager, 324 S. Canyon Street, Suite B, Carlsbad, New Mexico 88220 and Lea County Emergency Manager, 1923 Dal Paso, Suite A, Hobbs New Mexico, 88240.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>New Mexico Water Quality Control Commission, Part 1, Section 203</td>
<td>Any discharge from any facility of oil or any other water contaminant in such quantities as may, with reasonable probability, injure or be detrimental to human health, animal or plant life, or property.</td>
<td>Chief, Ground Water Quality Bureau, New Mexico Environment Department, or his counterpart in any constituent agency delegated responsibility for enforcement of the rules as to any facility subject to such delegation (505) 827-2919.</td>
<td>Within 24 hours: 1) the name, address, and telephone number of the person or persons in charge of the facility; 2) the name, address, and telephone number of the operator of the facility; 3) the date, time, location, and duration of the discharge; 4) the source and cause of the discharge; 5) a description of the discharge, including its chemical composition; and 6) the estimated volume of discharge, and immediate damage from the discharge. Submit within seven days: verification of the prior oral notification, also provide any appropriate additions or corrections to the information contained in the prior oral notification. Within 15 days: submit a written report describing any corrective actions taken and/or to be taken relative to the discharge. Send reports to Chief, Ground Water Quality Bureau, New Mexico Environment Department, P.O. Box 26110, Santa Fe, New Mexico, 87502.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Regulations</td>
<td>Chemical Releases Covered</td>
<td>To Whom Report Will Be Made</td>
<td>What Will Be Reported</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>------------------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>New Mexico Underground Storage Tank Regulations-2</td>
<td>Any known or suspected release from an Underground Storage Tank (UST) system, any spill or any other emergency situation.</td>
<td>New Mexico Environment Department Petroleum Storage Tank Bureau (505) 476-4397.</td>
<td>Within 24 hours: 1) the name, address, and telephone number of the agent in charge of the site at which the UST system is located, as well as the owner/operator of the system; 2) the name and address of the site and the location of the UST system on that site; 3) the date, time, location, and duration of the spill, release, or suspected release; 4) the source and cause of the spill, release, or suspected release; 5) a description of the spill, release, or suspected release, including its chemical composition; 6) the estimated volume of the spill, release, or suspected release; and 7) action taken to mitigate immediate damage from the spill, release, or suspected release.</td>
<td>Mail or deliver within seven days of the incident, a written notice describing the spill, release, or suspected release and any investigation or follow-up action taken or to be taken. Send reports to Petroleum Storage Tank Bureau, New Mexico Environment Department, 2044 Galisteo Street, Santa Fe, New Mexico, 87504.</td>
<td></td>
</tr>
</tbody>
</table>
FIGURES
<table>
<thead>
<tr>
<th>Bldg / FAC #</th>
<th>Description</th>
<th>Bldg / FAC #</th>
<th>Description</th>
<th>Bldg / FAC #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>#401</td>
<td>EQUIPMENT SHED</td>
<td>#334</td>
<td>SALT HANDLING SHAFT HOUSE</td>
<td>#415</td>
<td>QATTHOUSE</td>
</tr>
<tr>
<td>#242</td>
<td>GUARDSHACK</td>
<td>#304A</td>
<td>MINING OPERATIONS</td>
<td>#440</td>
<td>VEHICLE FUEL STATION</td>
</tr>
<tr>
<td>#215</td>
<td>SALT HAULING TRUCKS SHELTER</td>
<td>#411</td>
<td>WASTE HANDLING BUILDING</td>
<td>#481</td>
<td>WAREHOUSE ANNEX</td>
</tr>
<tr>
<td>#345</td>
<td>TRASH BACT TRASH SHELTER</td>
<td>#470</td>
<td>TRASH BACT MAINTENANCE BUILDING</td>
<td>#482</td>
<td>EXHAUST SHAFT WASTE CONTAINER</td>
</tr>
<tr>
<td>#266</td>
<td>HIGH STORAGE SHEDER</td>
<td>#413</td>
<td>EXHAUST SHAFT FILTER BUILDING</td>
<td>#485</td>
<td>SULLAIR COMPRESSOR BUILDING</td>
</tr>
<tr>
<td>#253</td>
<td>13 KV SWITCHGEAR 2U-2540/64KV1</td>
<td>#413A</td>
<td>RV MONITORING STATION A</td>
<td>#486</td>
<td>ENGINEERING BUILDING</td>
</tr>
<tr>
<td>#254.1</td>
<td>AREA SUBDIVISION NO. 1.25P-6MV1.5</td>
<td>#413G</td>
<td>RV MONITORING STATION B</td>
<td>#489</td>
<td>TRAINING BUILDING</td>
</tr>
<tr>
<td>#254.2</td>
<td>AREA SUBDIVISION NO. 2.25P-6MV3</td>
<td>#414</td>
<td>WATER CHILLER FACILITY &amp; BLDG</td>
<td>#490</td>
<td>SANDIA TEST WELL</td>
</tr>
<tr>
<td>#254.3</td>
<td>AREA SUBDIVISION NO. 3.25P-6MV3</td>
<td>#451</td>
<td>SUPPORT BUILDING</td>
<td>#917</td>
<td>AIR MONITORING</td>
</tr>
<tr>
<td>#254.4</td>
<td>AREA SUBDIVISION NO. 4.25P-6MV5</td>
<td>#452</td>
<td>SAFETY &amp; EMERGENCY SERVICES</td>
<td>#918</td>
<td>VOC TESTER</td>
</tr>
<tr>
<td>#254.5</td>
<td>AREA SUBDIVISION NO. 5.25P-6MV5</td>
<td>#453</td>
<td>FACILITY</td>
<td>#916A</td>
<td>VOC AIR MONITORING STATION</td>
</tr>
<tr>
<td>#254.6</td>
<td>AREA SUBDIVISION NO. 6.25P-6MV5</td>
<td>#455</td>
<td>WAREHOUSE/SHOPS BLDG</td>
<td>#916B</td>
<td>VOC CAB TRAILER</td>
</tr>
<tr>
<td>#254.7</td>
<td>AREA SUBDIVISION NO. 7.25P-6MV5</td>
<td>#456</td>
<td>AUXILIARY WAREHOUSE BUILDING</td>
<td>#950</td>
<td>WORK CONTROL TRAILER</td>
</tr>
<tr>
<td>#254.8</td>
<td>AREA SUBDIVISION NO. 8.25P-6MV5</td>
<td>#457</td>
<td>WATER PUMPHOUSE</td>
<td>#951</td>
<td>PROCUREMENT/PURCHASING</td>
</tr>
<tr>
<td>#254.9</td>
<td>88kV SWITCHGEAR 25P-6MV40</td>
<td>#457S</td>
<td>WATER TANK 25-D-619A</td>
<td>#952</td>
<td>TRAILER</td>
</tr>
<tr>
<td>#255.1</td>
<td>BACK-UP KEBRI GENERATOR 1.25P-6KV</td>
<td>#458</td>
<td>CABLES AND SECURITY BUILDING</td>
<td>#953</td>
<td>MODULAR OFFICE COMPLEX</td>
</tr>
<tr>
<td>#255.2</td>
<td>BACK-UP DIESEL GENERATOR 1.25P-6MV</td>
<td>#459</td>
<td>CABLE STORAGE BUILDING</td>
<td>#957</td>
<td>HUMAN RESOURCES TRAILER</td>
</tr>
<tr>
<td>#256.4</td>
<td>SWITCHBOARD #4 (25P-58D044N)</td>
<td>#460</td>
<td>COMPRESSOR BUILDING</td>
<td>#958</td>
<td>PUBLICATIONS &amp; PROCEDURES TRAILER</td>
</tr>
<tr>
<td>#511</td>
<td>WASTE SHAFT</td>
<td>#465</td>
<td>AUXILIARY AIR INTAKE</td>
<td>#513</td>
<td>Switchback No. 6</td>
</tr>
<tr>
<td>#351</td>
<td>EXHAUST SHAFT</td>
<td>#466</td>
<td>TELEPHONE HUT</td>
<td>#513</td>
<td>Switchback No. 7</td>
</tr>
<tr>
<td>#351</td>
<td>EXHAUST SHAFT</td>
<td>#470</td>
<td>AIR MORTY BUILDING</td>
<td>#513</td>
<td>Switchback No. 8</td>
</tr>
<tr>
<td>#352</td>
<td>AIR INTAKE SHIELD HOUSE</td>
<td>#474</td>
<td>HAZARDOUS WASTE STORAGE FACILITY</td>
<td>#513</td>
<td>Switchback No. 9</td>
</tr>
<tr>
<td>#353</td>
<td>AIR INTAKE SHIELD/WINCH HOUSE</td>
<td>#474A</td>
<td>HAZARDOUS WASTE STORAGE BUILDING</td>
<td>#513</td>
<td>Switchback No. 10</td>
</tr>
<tr>
<td>#354</td>
<td>EFFLIENT MONITORING INSTRUMENT</td>
<td>#474B</td>
<td>HAZARDOUS WASTE STORAGE BUILDING</td>
<td>#513</td>
<td>Switchback No. 11</td>
</tr>
<tr>
<td>#355</td>
<td>EFFLIENT MONITORING INSTRUMENT</td>
<td>#474C</td>
<td>OIL &amp; GREASE STORAGE BUILDING</td>
<td>#513</td>
<td>Switchback No. 12</td>
</tr>
<tr>
<td>#356</td>
<td>AIR INTAKE SHIELD HEADFRAME</td>
<td>#474D</td>
<td>GAS STORAGE BUILDING</td>
<td>#513</td>
<td>Switchback No. 13</td>
</tr>
<tr>
<td>#357</td>
<td>SALT HANDLING SHAFT HEADFRAME</td>
<td>#474E</td>
<td>HAZARDOUS MATERIAL STORAGE</td>
<td>#513</td>
<td>Switchback No. 14</td>
</tr>
<tr>
<td>#357</td>
<td>SALT HANDLING SHAFT HEADFRAME</td>
<td>#474F</td>
<td>WASTE OIL RETAILER</td>
<td>#513</td>
<td>Switchback No. 15</td>
</tr>
</tbody>
</table>

Figure D-1a  
Legend to Figure D-1

PERMIT ATTACHMENT D  
Page D-74 of 95
Figure D-2
Spatial View of the WIPP Facility
Figure D-3
WIPP Underground Facilities
Figure D-4
Direction and Control Under Emergency Conditions in Which the Plan Has Been Implemented
Figure D-4a
WIPP Facility Emergency Notifications
Figure D-5
Underground Emergency Equipment Locations and Underground Evacuation Routes
Figure D-7
Underground Diesel Fuel-Station Area Fire-Protection System
Figure D-8
WIPP On-Site Assembly Areas and WIPP Staging Areas

PERMIT ATTACHMENT D
Page D-82 of 95
Figure D-8a
RH Bay Evacuation Routes
Figure D-9
Designated Underground Assembly Areas
Figure D-10
Waste Handling Building Pre-Fire Survey (First Floor)
Figure D-10a
Waste Handling Building Pre-Fire Survey
(First Floor - Fire Hydrant/Post Indicator Location)
Figure D-11
Waste Handling Building Pre-Fire Survey (Second Floor)
Figure D-11a
Waste Handling Building Pre-Fire Survey
(Second Floor - Fire Hydrant/Post Indicator Location)
# WIPP HAZARDOUS MATERIAL INCIDENT REPORT

<table>
<thead>
<tr>
<th>Date:</th>
<th>Location:</th>
</tr>
</thead>
</table>

## I. INITIAL INFORMATION
- **DATE:**
- **TIME:**
- **EST:**
- **REPORTED LOCATION:**
- **REPORTED BY:**
- **DEPT:**
- **INITIALLY REPORTED TO:**
- **RESPONSIBLE MANAGER:**
- **DEPT:**

## II. WEATHER CONDITIONS
- **WIND DIRECTION:**
- **WIND SPEED:** mph
- **TEMP:** °F
- **CONDITIONS** (i.e., icy, snowing, raining, cloudy, sunny):

## III. TYPE OF INCIDENT
- **(SPILL, LEAK, ETC.)**
- **Fire involved:** [ ]YES [ ]NO
  (If fire is involved attach a copy of the fire report)

### MATERIALS INVOLVED
- **UNNA NO.**
- **QUANTITY**
- **HAZARD CLASS**
- **NFPA CLASS**

## IV. PERSONNEL INVOLVED IN CLEAN-UP ACTIVITIES

<table>
<thead>
<tr>
<th>PERSONNEL/DEPT</th>
<th>DECON METHOD/MEDICAL TREATMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## V. PERSONNEL CONTAMINATED NOT INVOLVED IN THE CLEANUP ACTIVITIES

<table>
<thead>
<tr>
<th>PERSONNEL/DEPT</th>
<th>MATERIAL CONTACTED</th>
<th>DECON/MEDICAL TREATMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### WIPP HAZARDOUS MATERIAL INCIDENT REPORT

**Date:** __________  
**Location:** __________

#### VI. EQUIPMENT USED FOR CLEAN-UP AND CONTROL MEASURES

<table>
<thead>
<tr>
<th>EQUIPMENT/MATERIAL/PPPE</th>
<th>QUANTITY</th>
<th>DISPOSITION (decon or replacement)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### VII. DESCRIPTION OF INCIDENT AND RESPONSE (including containment and control)

... (Content continues)

#### VIII. ENVIRONMENTAL COMPLIANCE

**Date:** __________  
**Time:** __________  
**Waste Category:** __________  
**Disposition:** __________

<table>
<thead>
<tr>
<th>ORGANIZATION</th>
<th>DATE</th>
<th>TIME</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**EC Representative:**

- **Print name:** __________
- **Signature:** __________
- **Date:** __________

---

Figure D-12 (Continued)  
WIPP Hazardous Materials Incident Report, Page 2 of 3

PERMIT ATTACHMENT D  
Page D-92 of 95
## WIPP HAZARDOUS MATERIAL INCIDENT REPORT

### IX. INITIAL NOTIFICATION BY CMRO

<table>
<thead>
<tr>
<th>DEPARTMENT</th>
<th>PERSON CONTACTED</th>
<th>TIME</th>
<th>NOTIFIED BY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility Ops (FSM)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emerg. Mgmt (EST)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Industrial Safety</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Facility Ops. (FM/FMD)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

CMRO:  
Print name  
Signature  
Date

FSM:  
Print name  
Signature  
Date

### X. CONTINGENCY PLAN IMPLEMENTATION

Contingency Plan implemented [ ]YES [ ]NO

FSM:  
Print name  
Signature  
Date

### XI. REVIEWS

Report submitted by:  
Print name  
Signature  
Date

Emergency Management Manager:  
Print name  
Signature  
Date

EC Manager:  
Print name  
Signature  
Date

**COMMENTS:**

---

Figure D-12 (Continued)  
WIPP Hazardous Materials Incident Report, Page 3 of 3