

PERMIT ATTACHMENT 6: CONTINGENCY PLAN

6.0 INTRODUCTION

The Permittees shall comply with the requirements at 40 C.F.R. Part 264 Subpart D, “Contingency Plan and Emergency Procedures,” and 40 C.F.R. § 270.14(b)(7). Information specific to the Chemical Waste Landfill (CWL) is included in this Permit Attachment. Current copies of this Contingency Plan shall be maintained at both the Corrective Action Management Unit (CAMU) administrative trailer and the Facility’s Emergency Operations Center (EOC). The CAMU is a RCRA-regulated remediation-waste management unit that is located about 100 yards northwest of the CWL. Emergency response resources for the CAMU are shared with the CWL.

The inactive CWL is a 1.9-acre hazardous waste landfill located in the southeastern corner of Technical Area (TA)-III (TA-III). A map that shows the locations of the Facility’s TAs and the location of the CWL is presented on Figure 1 in Attachment 1 of this Permit. A more detailed map of the CWL area is presented.

Table 6-4 lists the emergency equipment that shall be maintained at the CAMU for use at the CWL. This equipment shall be tested on a quarterly basis and be shall maintained as necessary to ensure proper operation. Table 6-5 lists the emergency coordinators.

Waste Types

Hazardous waste generated at the CWL includes purge water derived from the sampling of groundwater monitoring wells, and personal protective equipment (PPE) waste generated during the sampling and management of purge water and the sampling of soil gas. Hazardous constituents may include, but are not limited to, volatile organic compounds and toxic and heavy metals. Waste generated at the CWL will be stored and managed at the CAMU less-than-90-day waste accumulation area or another established less-than-90-day waste accumulation area.

Purge Water Management

Purge water shall be collected and managed during groundwater monitoring activities by personnel who have received training in hazardous waste management. Whenever purge water is being pumped, poured, or otherwise handled, all personnel involved in the operation shall have access to a phone or radio to contact Facility and Kirtland Air Force Base (KAFB) emergency personnel, if necessary.

Facility personnel shall clean up spills immediately, and shall notify the Emergency Coordinator (EC) of the incident as required by Section 6.4 of this Contingency Plan; the EC will determine if the incident is an emergency. At least two samples shall be collected and analyzed to ensure complete cleanup has been achieved. Additional samples may be required by the New Mexico Environment Department (the Department) depending on the magnitude and character of the spill. The samples shall be analyzed for the same parameters as those required in this Permit for groundwater sampling.

Field quality control samples, consisting of at least one field and one trip blank and one duplicate (for all analytes) shall also be collected and analyzed in a laboratory for each sampling event associated with a spill.

Container Management

Typical containers used to store waste generated during post-closure care monitoring activities at the CWL include 55-gallon drums that shall be managed in accordance with applicable provisions of 40 C.F.R. Part 262 and 40 C.F.R. Part 264 Subpart I.

6.1. DISTRIBUTION OF CONTINGENCY PLAN AND AMENDMENTS

Copies of this Contingency Plan shall be maintained at: 1) The CAMU, 2) The Facility EOC, and 3) The Facility Records Center. The Permittees shall also provide copies of this Plan and any amendments and updates of this Plan to the KAFB Fire Department and the Department.

The Permittees' EC(s) and the Facility emergency response organization (ERO) personnel shall periodically review this Contingency Plan. The Plan shall be amended, if necessary, whenever one or more of the following occurs:

1. Applicable regulations or Permit conditions are revised;
2. There is a significant change in Facility or Unit design, construction, maintenance, operation, or other circumstance that increases the potential for emergencies or changes the response necessary in an emergency;
3. The list of designated emergency coordinators changes;
4. The list of required emergency equipment changes; or
5. The Plan fails during an incident or an emergency.

6.2. EMERGENCY RESPONSE RESOURCES

Resources are available at the Facility, within KAFB, and in Albuquerque as described in this section.

6.2.1. Emergency Coordinator (EC) and Responsibilities

The EC and alternate ECs shall be thoroughly familiar with this Contingency Plan, the layout of the CWL, sampling and monitoring operations, the location of records, and the emergency equipment and supplies. The EC shall have the authority to commit the necessary resources (including personnel, materials, and funds) to respond to any incident or emergency at the CWL.

During an incident or emergency at the CWL, or until the Facility emergency response Incident Commander (IC) arrives, the EC has three primary responsibilities:

1. **Assess the Situation.** By observing the scene, interviewing personnel, and/or reviewing records, the EC must gather information relevant to the response, such as the type of event, quantity and type of released material, and actual or potential hazards to human health or the environment.
2. **Protect Personnel.** The EC shall take any reasonable measures to ensure the safety of personnel, such as activating the fire alarm, accounting for personnel, attending to injuries, or coordinating the evacuation of personnel, if necessary. If evacuation is indicated for other personnel, the IC must be informed.
3. **Contain or Mitigate the Hazards.** The EC shall take reasonable measures to ensure that fires, explosions, or releases do not occur, recur, or spread.

After an incident or emergency, the EC shall ensure that the CWL and equipment are cleaned, waste is properly managed and disposed of, the CWL is safe, and all information necessary for notifications and reports is provided to Facility personnel, as outlined in Section 6.6.

In the event that the EC is not on site or immediately available during an incident or emergency, an alternate EC shall be contacted. The names, addresses, and phone numbers of the primary and alternate ECs for the CWL are included in Table 6-5. The EC or alternate EC shall be on site or immediately available during sampling and analysis events.

6.2.2. Emergency Response Groups

The Facility ERO consists of two response groups that respond to an emergency situation: (1) a field response group led by an IC under the Incident Command System (ICS) and (2) an EOC cadre. The ICS also includes Facility Security, the KAFB Fire Department, and the Facility personnel with relevant technical skills. An IC shall be on site at the Facility at all times (24 hours per day, 7 days per week). Facility security personnel shall also be available at all times. The Permittees shall maintain their MOU with the 377th Air Base Wing of KAFB for fire protection and other support as referenced in Section 6.2.4 of this Permit Attachment. Facility technical personnel are available on site from 8:00 am to 4:30 pm Monday through Friday and are on call the rest of the time. Facility EOC staff shall include an Emergency Director and a staff of Sandia Corporation and Department of Energy (DOE) personnel who are responsible for management decisions and notifications to outside parties that are required during an emergency response. EOC staff personnel shall be available on site at the Facility from 8:00 am to 4:30 pm, Monday through Friday, except for holidays and Facility closure, and shall be on call at all times.

In the field, the IC shall maintain overall management and control of response operations during an emergency. The IC shall work in a unified command with the KAFB Fire Department and in concert with safety personnel, CWL personnel, and other emergency responders to develop and execute response plans, including on-site protective actions and recommendations for off-site protective actions. The ICS system shall be implemented at the time an emergency occurs and shall be expanded to control the emergency as needs arise, and shall remain in effect until the need for emergency management no longer exists.

6.2.3. Emergency Chain of Command

When the EC is notified of an incident, he shall first determine if the procedures for emergencies should be implemented. If an incident is an emergency, the EC shall manage the emergency response until the IC arrives at the CWL, then the EC will relinquish control to the IC. If possible, the EC shall maintain communication with the IC by telephone or radio before the IC arrives at the CWL. The EC shall remain at the CWL and assist in the emergency response as directed by the IC. The EC shall advise the IC, as needed, on CWL operations, CWL layout, characteristics of hazardous waste on site, location of records, radio and cellular communication systems, and other information as necessary to respond to the emergency.

The Facility IC is the liaison for communications with other emergency response organizations and functions, including medical and fire protection support. The EC can request both medical and fire protection services, if necessary, at the same time that he/she notifies the IC of an emergency.

6.2.4. Support Agreements and Coordination with Outside Agencies

The Facility shall maintain sufficient response resources to handle most emergencies arising from hazardous waste management activities as described in this Contingency Plan. These response resources include personnel, emergency equipment, medical facilities, and communications systems. The Facility has also established mutual aid agreements and memoranda of understanding with several off-site agencies and facilities for additional response capabilities for the Facility. These agencies and facilities include the establishments listed in Table 6-1.

**TABLE 6-1
 Agreements and Memoranda of Understanding for Emergency Response**

Agency or Facility	Type of Service
The New Mexico Department of Homeland Security and Emergency Management	Mutual aid involving an actual or potential emergency, assistance in training and emergency response for local and tribal governments.
The 377th Air Base Wing, Kirtland Air Force Base	Various types of support, including fire protection, police services, communications, and utilities.
The City of Albuquerque	Mutual support and responsibilities during a potential or actual emergency requiring the combined resources of DOE and the City of Albuquerque.
The University of New Mexico Medical Center	Mutual cooperation and assistance in providing timely and effective emergency medical services.
Lovelace Medical Center	Mutual cooperation and assistance in providing timely and effective emergency medical services.
Presbyterian Health Care Services	Mutual cooperation and assistance in providing timely and effective emergency medical services.

6.3. EMERGENCY EQUIPMENT

A list of equipment available through the Facility emergency response system is provided in Table 6-2. A list of emergency equipment to be maintained at the Corrective Action Management Unit for use at the CWL is presented in Table 6-4.

**TABLE 6-2
Chemical Waste Landfill Emergency Response Equipment Inventory**

Item or Equipment	Description/Telephone
Emergency Vehicles (owned by the Facility unless noted)	
Emergency Response Vehicle	Mobile Command Post equipped with communications equipment, typically located at SNL EOC ^a . SNL Emergency Response System: Call 911 or (505) 844-0911
Ambulance	Typically located at SNL medical facility. SNL Emergency Response System: Call 911 or (505) 844-0911
Security Vehicles	Vans and trucks equipped with communications equipment and utilized for transportation of personnel and equipment, typically located throughout SNL. SNL Emergency Response System: Call 911 or (505) 844-0911
Fire Trucks (owned by KAFB Fire Department)	Fire-fighting vehicles outfitted with equipment for fighting fires, typically located at KAFB fire stations. SNL Emergency Response System: Call 911 or (505) 844-0911
Medical Supplies	
Stretchers/Stokes Litter	Equipment for movement of injured personnel. Stokes litter will immobilize personnel so they may be moved vertically. Typically located in ambulance or at SNL medical facility. SNL Emergency Response System: Call 911 or (505) 844-0911
Blankets	Normal blankets, typically located in ambulance or at SNL medical facility. SNL Emergency Response System: Call 911 or (505) 844-0911
Medical Kits	Emergency first-aid supplies, typically located in ambulance or at SNL medical facility. SNL Emergency Response System: Call 911 or (505) 844-0911
Safety Supplies	
Air Packs	Self-contained breathing apparatus for use by personnel entering hazardous atmospheres, typically located in ambulance or response vehicle. SNL Emergency Response System: Call 911 or (505) 844-0911
Monitoring Instruments	Typically located in ambulance or emergency response vehicle. SNL Emergency Response System: Call 911 or (505) 844-0911

^aThe Facility EOC is located at Technical Area I (TA-I).

EOC = Emergency Operations Center
KAFB = Kirtland Air Force Base
SNL = Sandia National Laboratories

6.4. CONTINGENCY PLAN IMPLEMENTATION

Facility personnel who become aware of an incident or emergency shall contact the EC immediately. If the incident is an emergency, personnel shall implement evacuation procedures identified in Section 6.4.2. Personnel shall also immediately notify the EC or alternate EC of the incident or emergency. The EC shall then assess the situation and determine whether the incident is an emergency.

If the EC determines that an emergency situation exists at the CWL, he shall immediately notify the EOC. The methods for contacting emergency response representatives are listed in Table 6-3.

**TABLE 6-3
 Facility Emergency Response System Notification**

Method	Emergency Number
Telephone	911
Mobile Telephone	(505) 844-0911

Note: Any person is authorized to implement the evacuation procedures, notify the EC or alternate EC, and/or contact the emergency response representatives in the unlikely event that the EC or alternate EC cannot be contacted or respond in a timely manner.

6.4.1. Emergencies

In the event of an emergency, the EC, a designee, or CWL personnel shall immediately telephone the EOC (by calling 911 or 844-0911) or notify them in some other way. The EC shall relinquish authority to the IC upon arrival. The EC and the IC shall:

1. Determine the extent of the emergency;
2. Identify the character, source, amount, and extent of released materials by observation, records reviews, or chemical analysis;
3. Assess possible resulting hazards to human health or the environment, considering both direct and indirect effects;
4. Take all reasonable measures necessary to ensure fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the CWL, including collecting and containing released waste, and removing or isolating containers; and

Monitor for leaks, pressure buildup, gas generation, and ruptures in equipment.

**TABLE 6-4
 Emergency Equipment for the Chemical Waste Landfill,
 Located at the Corrective Action Management Unit**

Category	Description	Specific Location at CAMU
Spill Control Equipment	Spill control materials, including sorbent material, brooms and shovels	Leachate Storage Area Shed
Fire Extinguisher	Portable, Multi-Class	One near the Leachate Storage Area and Containment Cell, and one in CAMU Administration Trailer
Communications: (Internal/External)	Cellular Phone or Red Site radio	In the vicinity of the Leachate Storage Area
Water Supply	Fire Hydrant Ground Hydrant	One outside the southeast entrance to the CAMU Two near the former Treatment Pad and two near the former Bulk Waste Staging Area
Environmental Safety and Health	Portable eyewash station	Leachate Storage Area Shed (during waste handling activities)
Evacuation	Voice command by on-site personnel or signaled by three blasts of a vehicle warning horn.	Designated Assembly Area (See Figure 2)

CAMU = Corrective Action Management Unit.

6.4.1.1. *Fire*

The following steps shall be implemented as needed in the event of an emergency involving an imminent or existing fire.

1. All non-essential personnel shall evacuate following the evacuation route described in this Permit Attachment or to an alternate assembly location as directed by the EC. All personnel shall evacuate as soon as possible if it becomes necessary to ensure their health and safety.
2. The EC (or Unit personnel) shall immediately notify the Facility ERO and KAFB Fire Department by activating a manual pull alarm or by dialing the EOC at 911 or 844-0911. Medical response can also be requested at the same time. The KAFB Fire Department and the Facility ERO shall also be notified by activation of an automatic fire alarm.
3. CWL personnel may consider taking action to put out a fire or minimize its spread ONLY if safe to do so. These actions may be taken only after the IC and KAFB Fire Department have been notified. Personnel must not jeopardize their own safety or the safety of other personnel.
4. If a fire is small and the fuel source is small, portable fire extinguishers may be used to put out the fire.
5. Fire extinguishers shall only be used by personnel trained in their use, and only for very small fires.
6. Flammable materials shall be removed from the area of a fire if safe to do so.
7. If the fire spreads or increases in intensity, all remaining personnel must evacuate.
8. The EC shall remain near the CWL, but at a safe distance, so he can advise personnel responding to a fire of the known hazards.
9. Upon arrival at a fire, the KAFB Fire Department officer-in-charge shall be in command of fire fighting. He shall accept and evaluate the advice of the CWL and emergency response personnel, but he retains the responsibility of selecting the fire-fighting methods and tactics.
10. The IC shall be in overall control of the Facility emergency response efforts until the emergency is terminated.
11. Hazardous wastes involved in a fire can be identified in the following ways: The location of the container may indicate the contents. If the location does not indicate its contents, the label number can be used to identify the waste. Records on the contents of each container can be accessed from outside the CWL. If the label has been burned and the container cannot be identified, the waste shall be treated as an unknown.
12. Residues of hazardous wastes may be collected and contained by stabilizing or neutralizing the spilled waste, as appropriate; pouring an absorbent over the spilled waste; and sweeping or shoveling the absorbed waste into drums or other appropriate containers.
13. If needed, affected surfaces shall be cleaned using cleaners appropriate for the chemicals and wastes involved.

14. If possible and safe, responding personnel shall take measures to contain potentially hazardous runoff and keep it away from storm drains and/or sewers. If possible, personnel shall build dikes around storm drains.

6.4.1.2. *Explosion*

The following steps shall be implemented as needed in the event of an emergency involving an imminent or existing explosion.

1. Personnel shall immediately evacuate the area.
2. The EC (or CWL personnel) shall immediately notify the Facility ERO and KAFB Fire Department by activating a manual pull alarm or by dialing the EOC at 911 or 844-0911. Medical response can also be requested at the same time. The KAFB Fire Department and the ERO shall also be notified by activation of an automatic fire alarm.
3. The EC shall remain near the CWL, but at a safe distance, so that he/she can advise the response personnel of the known hazards involved and the degree and location of the explosion and associated fires.
4. Upon arrival at the site, the KAFB Fire Department officer-in-charge shall be in command of fire fighting. He/she will accept and evaluate the advice of the CWL personnel and emergency response organization members, but retains the responsibility of selecting the fire-fighting methods and tactics.
5. The IC shall be in overall control of Facility emergency response efforts until the emergency is terminated.
6. Residues of hazardous wastes may be collected and contained by stabilizing or neutralizing the spilled waste, as appropriate; pouring an absorbent over the spilled waste; and sweeping or shoveling the absorbed waste into drums or other appropriate containers. If needed, affected surfaces shall be cleaned using cleaners appropriate for the chemicals and wastes involved.
7. If possible, responding personnel will take measures to contain potentially hazardous runoff and keep it away from storm drains and/or sewers, such as building dikes around storm drains.
8. The EC shall secure the CWL once it has been determined to be safe by the IC or a safety officer.

6.4.1.3. *Uncontrolled Release*

The following steps shall be implemented as needed in the event of an incident or emergency involving an imminent or existing release of hazardous waste and/or radioactive mixed waste or constituents:

1. Evacuate the immediate area.
2. If it is an emergency, the EC (or CWL personnel) shall immediately notify the ERO and KAFB Fire Department by activating a manual pull alarm or by dialing the EOC at 911 or 844-0911. Medical response can also be requested at the same time. The KAFB Fire Department and ERO shall also be notified by activation of an automatic fire alarm.

3. Take actions to minimize, contain, and clean up the release only if safe to do so.
4. Review Facility records (e.g., waste inventory database) to determine the identity and chemical nature of the released material.
5. Wear appropriate personal protective equipment to clean up the spill or release.
6. If possible, secure the source of the release.
7. If necessary and possible, build a dike to contain runoff.
8. Take measures to contain potentially hazardous runoff and keep it away from storm drains and/or sewers and if possible, build dikes around the storm drains.
9. Released wastes shall be collected and contained by stabilizing or neutralizing the spilled waste, as appropriate; pouring an absorbent over the spilled waste; and sweeping or shoveling the absorbed waste into drums or other appropriate containers.
10. No waste that may be incompatible with the released material shall be managed at the CWL until the cleanup procedures are completed.
11. After collection of a released waste, soil at the affected site shall be sampled and analyzed. If contamination is found to exist, contaminated soil shall be collected, contained (if appropriate), and removed from the site for disposal at a permitted disposal facility. Depending on the specific conditions, however, the Facility may choose to implement an alternative decontamination method such as surface cleaning or in-situ neutralization or stabilization. Any such alternative shall be approved by the Department prior to implementation.

6.4.2. Evacuation

During an emergency that threatens the health or safety of CWL personnel, the following steps shall be taken as needed to facilitate safe coordinated evacuation:

1. Stop work.
2. If safe, close containers and shut down equipment or otherwise place it in a safe mode.
3. Alert personnel in the affected area by announcing the evacuation by voice command, "Evacuate the Area."
4. Activate the available evacuation signal consistent with the internal communications and alarm systems.
5. Notify the Facility ERO by activating a manual pull alarm or by dialing the EOC at 911 or 844-0911. Medical response can also be requested at the same time. The KAFB Fire Department and the ERO shall also be notified by activation of an automatic fire alarm.
6. Check to see whether there is evidence that the designated evacuation route is not safe.
7. If there is no evidence of danger or obstacles, exit the CWL according to the evacuation route.
8. If there is evidence of danger or obstacles, exit the CWL by any safe route available.
9. If safe, check for other personnel in other areas of the CWL.

10. Proceed to the designated assembly area for roll call to be taken by the EC or designee.
11. If the EC and CWL personnel are assembling at an alternate location, proceed to that location.
12. Inform the EC or designee about any other people still believed to be inside the CWL.
13. Do not re-enter the CWL until the IC or EC determines that is safe.

The evacuation route to be used during an emergency is shown in Figure 2 of Attachment 1 of this Permit.

6.4.3. Coordination with Off-Site Parties and Emergency Notification

The Facility EOC shall notify DOE of all emergencies at the Facility. The Permittees shall notify State and Local agencies if State or Local response resources are needed, if human health or the environment is threatened outside the Facility, or if areas outside the SNL Facility may require protective action. The Facility will verbally inform the City of Albuquerque and Isleta Pueblo as soon as possible, in the unlikely event that residents of Albuquerque or Isleta Pueblo could be affected. The notification shall include available information about the nature and location of the emergency, the waste and materials involved, and the recommended protective actions. The most likely protective actions are expected to include evacuation or sheltering indoors with doors and windows closed and ventilation systems shut off.

In the event of emergency involving injuries that require medical services from one of the hospitals listed in Table 6-1, the Permittees shall provide all available information about the incident and the wastes and materials involved to the responders as soon as possible.

The Permittees shall also notify the National Response Center (1-800-424-8802) if human health or the environment is threatened outside the Facility. The notification shall include the following.

1. Name and telephone number of the responsible official
2. Facility name and address
3. Time and nature of emergency
4. Type and quantities of wastes and materials involved to the extent known
5. Personnel injuries, and
6. Potential hazards to human health, or the environment, outside the Facility.

Further, the Permittees shall also provide this information to the Department in accordance with regulatory requirements, including verbal notification via the 24-hour emergency reporting number (1-505-827-9329) or other emergency notification number designated by the Department.

6.5. POST-EMERGENCY ACTIONS

Immediately after an emergency, the EC and the IC shall:

1. Continue to monitor for leaks, pressure buildup, gas generation, and ruptures in valves, pipes, or other equipment;
2. Provide for properly treating, storing, or disposing of recovered waste, contaminated soil or other media, or any other material or waste;

3. Ensure that no waste that may be incompatible with released material or waste is managed at the CWL until cleanup procedures are completed; and
4. Ensure that all equipment used in responding to the emergency is cleaned and fit for its intended use before resuming operations at the CWL.

Before resuming operations after an emergency, the Permittees shall notify the Department that incompatible waste will not be managed until cleanup procedures are complete and equipment listed in this Contingency Plan is cleaned and fit for use.

6.6. EMERGENCY RESPONSE RECORDS AND REPORTS

The time, date, and details of an incident or emergency involving implementation of this Contingency Plan shall be noted in the Operating Record. Within fifteen (15) calendar days following the incident or emergency, a written report shall be submitted to the Department identifying:

1. Name, address, and telephone number of the responsible official;
2. Name, address, and telephone number of the Facility;
3. Date, time, and type of emergency or incident (e.g., fire, explosion, release);
4. Name and quantity of wastes and material(s) involved;
5. Extent of injuries (if any);
6. Assessment of actual or potential hazards to human health or the environment, where applicable; and
7. Estimated quantity and disposition of recovered material and wastes that resulted from the incident or emergency.

TABLE 6-5
Emergency Coordinator List for the Chemical Waste Landfill

Emergency Coordinators ^a	Home Telephone	Office Telephone	Cellular or Pager
Primary: Donald P. Schofield Office Location: MO 203 P.O. Box 5800 Environmental Management MS-1089 Albuquerque, NM 87185	268-6888	844-4088	259-7098(Cell)
1st Alternate: Bruce Reavis Office Location: MO 200 P.O. Box 5800 Environmental Management MS-1042 Albuquerque, NM 87185	296-0007	845-8403	250-6388 (Cellular) 530-7538 (Pager)
2nd Alternate: Robert Ziock Office Location: MO 202 P.O. Box 5800 Environmental Management MS-1088 Albuquerque, NM 87185	255-4714	845-0845	None

^aAt least one emergency coordinator must be at the CWL or CAMU unit or on call.

