3.0 CONTINGENCY PLAN

White Sands Missile Range (WSMR) prepared this RCRA Contingency Plan for the HWSF in compliance with New Mexico Hazardous Waste Management Regulations (HWMR) 20 New Mexico Administrative Code (NMAC) 4.1, 40 CFR §270.14(b)(7) and 40 CFR Parts 264, Subpart D, as applicable. This plan consists of descriptions and emergency procedures specific to the HWSF and is consistent with the *WSMR Hazardous Materials (HAZMAT) Incident Plan, Annex C to WSMR All Hazards Response Plan.* This additional plan was developed to ensure that WSMR organizations are able to respond safely and effectively to oil and/or hazardous substance spills. The requirement originates in the *National Oil and Hazardous Substance Pollution Contingency Plan (NCP)* which was established under the Clean Water Act (CWA) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

3.1 Purpose

This Contingency Plan defines responsibilities, provides guidance for coordination of activities, and minimizes hazards to human health or the environment from fires, explosions, or any sudden or non-sudden release of hazardous waste to the air, soil, or surface water. The provisions of this plan will be carried out immediately if there is a fire, explosion, spill, or release of hazardous waste constituents that could threaten human health or the environment.

This plan identifies policies, responsibilities, procedures, and resources for response to actual and potential spills at the HWSF. This plan has been reviewed by, and agreed upon by the WSMR Fire Department, Security Office, Medical Clinic, and White Sands Missile Range Safety Division.

3.2 Distribution

Copies of this RCRA Contingency Plan will be on file at the following locations in compliance with 40 CFR § 264.53.

- WSMR Control Center;
- McAffee Clinic;
- Fire and Emergency Services Division;
- Administrative offices of the HWSF;

3.3 Types of Waste

Wastes covered under this Permit include corrosive, reactive, flammable, and toxic materials. Refer to Attachment 1 of this Permit for detailed listings.

3.4 HWSF Schedule, Emergency Response Procedures, and Notification

The following information is supplied in accordance with 40 CFR § 264.52 (d) and § 264.55. Emergency response procedures for the HWSF are written in accordance with the *WSMR All Hazards Response Plan,* under which WSMR will operate in the event of a hazardous material incident or oil spill. It defines the roles, responsibilities, and organizational relationships of

WSMR Directorates, tenant and other organizations in responding to, and recovering from, an oil spill or incident involving the transport, use, storage, or processing of hazardous waste.

At any time any person becomes aware of a fire, spill, potential release, or any other emergency, a call must immediately be placed to the WSMR Control Center (911). This organization will notify the appropriate organizations for response to the situation (medical, security, fire, etc). The Installation on Scene Commander (IOSC) is the senior Fire Department person on site until relieved by a higher authority such as the WSMR Fire Chief. At the time of the emergency, the WSMR Garrison Commander (GC) is notified and provided with all information regarding the emergency. The IOSC will evaluate the emergency and determine the on site actions.

The management of emergencies may change depending on time of day, availability of personnel etc. All emergencies on WSMR are handled through the WSMR Control Center (911). This agency has the resources to respond effectively and to activate currently trained and knowledgeable personnel. Specific personnel from the HWSF will be contacted in the event of an emergency. Ultimate responsibility for emergency response rests with the GC who has designated the Fire Chief as the IOSC. Notification to individuals with specific expertise and the WSMR Fire and Emergency Services Division is managed from the centrally located WSMR Control Center, which is staffed on a 24-hour basis. The WSMR Control Center maintains an updated roster of specialty personnel required for an emergency response.

As stated in the Annex G to the WSMR All Hazards Response Plan, the primary and alternate emergency coordinators for all Post operations are:

- Primary ECs: Director of Plans, Training, Mobilization, and Safety (DPTMS)
  Mr. Gerry Veara, 100 Headquarters Ave, WSMR, NM 88002
  Office: 575-678-1501 Cell: 575-993-0155

- 1st Alternate EC: Fire Chief
  Mr. Carlos Soto, 155 Aberdeen Ave, WSMR, NM 88002
  Office: 575-678-0314 Cell: 575-993-0155

- 2nd Alternate EC: Senior Fire Officer
  Mr. Marc Davis, 155 Aberdeen Ave, WSMR, NM 88002
  Office: 575-678-2800 Cell: 575-993-7529

3.5 Installation Response

Upon notification of an emergency incident, the WSMR Control Center will record all pertinent information from the first responder and first response emergency organizations. The IOSC, as described above, will form a team using personnel from all WSMR activities to form an IRT. This person will notify the WSMR Control Center to ensure appropriate people and organizations are activated for emergency response.

If an incident can be easily managed by on-hand equipment, supplies, and labor, it is considered a minor incident. A minor incident is defined as an incident where no possible hazards exist to human health or the environment.

The IOSC will define the nature of the assistance requested, will make a determination whether the incident is minor and provide instruction to those organizations requested.

NOTE: IN NO INSTANCE WILL A FIRE BE CONSIDERED A MINOR INCIDENT.

3.5.1 Installation Response Team (IRT)

If the IOSC determines that the members of the IRT must be activated, the organizations listed below will be called. Representatives from each organization will respond. The IRT telephone roster is provided in Table 3-1. The top three organizations will be activated by dialing 911. At this time, the WSMR Control Center will activate all emergency services organizations.

Table 3-1. Installation Response Team (IRT) Roster

Organization	Daytime Telephone
Fire and Emergency Services Division	678-4187 or 911
McAffee Health Clinic	678-2882 or 911
Law Enforcement and Security	678-1234 or 911
Public Affairs	678-1134
Environmental Compliance	678-1007
Public Works Directorate	678-4941/1405
Safety Division	678-1211
Chemistry Laboratory	678-2992
Explosive Ordnance Disposal	678-2035
Weather Station	679-9118
Visual Services	678-2868
WSMR helicopter support	679-1315

3.6 HAZMAT Incident Site Operations and Field Teams

The following information is provided in accordance with (40 CFR § 264.56).

During normal working hours at the HWSF, the first person to become aware of an incident shall contact the WSMR Control Center (911). He/she will provide, if possible, the following information: substance involved, nature of the incident, quantity, location, and/or injuries involved. All personnel will immediately leave the vicinity of the HWSF. If the IOSC determines that a HAZMAT incident/emergency situation exists (e.g., large spill, fire, or explosion), or that human health or the environment is threatened, he will immediately activate the Contingency Plan.

There are many steps required in the handling of a HAZMAT Incident. After a HAZMAT

incident is reported, the response is initiated and operations started. Each operation is addressed step by step in priority:

- Assess the Situation. Assessment will be made by observing the scene, interviewing personnel, and/or reviewing records; then identifying the potential hazard and the parameters that determine the degree of the hazard. The IOSC will 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.

- Protect Personnel. The IOSC will take all reasonable measures to ensure the safety of personnel, such as activating the fire alarm, accounting for HWSF personnel, attending to injuries, or coordinating the evacuation of HWSF personnel, if necessary. If evacuation is indicated for other personnel, the IOSC must be informed.

- Contain or Mitigate the Hazards. The IOSC will take reasonable measures to ensure that fires, explosions, or releases do not occur, recur, or spread. The IOSC will apply methods to reduce or control the risk associated with the hazardous waste/material, such as effective engineering to reduce or eliminate the exposure time, use minimum personnel limiting the amount of time personnel spend in the hazard area, and selection of personnel protective clothing and equipment.

3.6.1 Field Teams and Operational Levels

The field team size is determined by the size of the incident and the operational level for the risk posed by the hazardous waste/material. The "buddy system" will be used at all times when working in hazardous areas. There are four operational levels, as defined by 40 CFR § 1910.120.

- Level A is the maximum protection required. It includes a pressure-demand, full face-piece respirator Self Contained Breathing Apparatus (SCBA) and totally encapsulating chemical protective suits, which may require pressurization, dependent on the hazard.

- Level B requires a pressure-demand, full face-piece respirator and encapsulating or hooded one or two-piece chemical splash suit (may be disposable), dependent on the hazard.

- Level C requires half or a full face-piece air purifying respirator and hooded chemical resistant clothing (may be disposable).

- Level D requires no respiratory protection, but usually requires a work uniform including steel-toed boots, hard hat, eye protection and gloves.

Level A is the minimal level of protection for the first person entering a hazardous area of unknown chemical release. A limited number of personnel will respond.

In incidents where level D is required, the Hazardous Material (HAZMAT) Response Unit will be dispatched with the following crew: on-scene commander, driver, 2 rescue men, and 2 firefighters as a work party. Other supporting agencies will be notified as required. In addition to the 40-Hour Hazardous Waste Operations and Emergency Response (HAZWOPER) course, the incident commander, where feasible, will have received the 8-Hour supervisory training in same. It is specifically acknowledged that firefighters receive training as specified by NFPA 472 and 473,

which is equivalent to 29CFR1910.120.

In incidents where level A-C is required, the HAZMAT Unit will be dispatched with the following crew: on-scene commander, driver, 2 rescuemen, and 2 firefighters as a work party. One fire company with at least a 3-man crew will be dispatched to be used as needed. Security, safety, and medical support will be called to the scene. All other on duty fire department personnel will be on alert status for dispatch.

A field investigation will be initiated to determine the potential hazard and appropriate response. The investigation is intended to rapidly identify the hazardous waste by review of MSDS, turn-in documents, and manifests; interview of personnel involved or witness to the incident; observing containers for markings; using testing equipment; taking samples for lab identification if required. An evaluation will be made to the need for evacuation of personnel at risk, to include down wind, as required.

3.6.2 Control of Incident Scene

Control of the incident scene will be established by using marking tape or other barriers to exclude unnecessary personnel from the area. Work zones will be established within the site using the 3-Zone method.

- Zone 1 - Exclusion Zone. The exclusion zone is the innermost of the three zones where the hazardous waste is located. Personnel entering this zone must wear the prescribed level of protective gear and be visually monitored by the site safety and decontamination officers. The boundary of Zone 1 is the hot line, and once determined, will be physically marked and secured. Factors such as fire or explosion, blown contaminants, etc. must be considered when establishing the limits of the exclusion zone and its dimensions may change as work proceeds.

- Zone 2 - Contamination Reduction Zone. This zone is used for decontamination of personnel, equipment, and waste containers leaving the exclusion zone. Entry points to the outer boundary of Zone 2 will be determined and will be the only access used. Exit points from Zone 1 will be determined and pass through decontamination stations will be set up in Zone 2. Access (entry and exit) control points will be visually monitored by the site safety and decontamination officers. Personal protective equipment is typically required in Zone 2, but at a lesser level than that required in Zone 1.

- Zone 3 - Support Zone. The support zone is considered to be a clean area. Support equipment, command post, etc. are located in this zone. Traffic is restricted to authorized personnel only. Level D protection is typically required in Zone 3.

The following criteria should be considered in establishing work zone dimensions and boundary distance:

- physical and topographical features at the HWSF;
- weather conditions;
- field/laboratory measurements of air contaminants and environmental samples;
- air dispersion calculations;

- potential for explosion and flying debris;
- physical, chemical, toxicological & other characteristics of the RCRA waste present;
- cleanup activities required;
- potential for fire;
- area needed to conduct operations;
- decontamination procedures;
- dimensions of contaminated area;
- potential for exposure to contaminant;

Handling, decontamination, and disposal of hazardous wastes will be in accordance with Federal/State laws and regulations, 40 CFR § 264.56(g).

3.7 Emergency Response Implementation of the Contingency Plan

3.7.1 Fire

Any fire in the vicinity of the HWSF is to be considered an emergency. This includes any fire involving hazardous waste or hazardous material, or any buildings, vegetation, or non-hazardous waste fire that threatens to ignite hazardous waste. Prior to any fire fighting, the following criteria will be implemented.

- WSMR Fire Department will be notified.
- HWSF personnel shall evacuate to an upwind location at least 100 yards (90 m) from the fire.
- The IOSC will be notified immediately by the WSMR Control Center;. IOSC will determine the appropriate response.
- Fire-fighting personnel must wear appropriate personal protective equipment.
- Immediately transport any injured personnel to the medical facility.
- The IOSC will remain near the site, but at a safe distance, so he can advise the personnel responding to the fire of the known hazards involved.
- In the event of an explosion/fire, the IOSC retains responsibility to select the fire-fighting methods and tactics;. IOSC determines when the emergency action was been completed.
- The IOSC will be in overall control of WSMR-HWSF emergency response efforts.

Wastes/Materials involved in a fire can be identified in the following ways:

- The location of the drum may indicate the contents of the drum (e.g., drums in the flammable storage building contain flammables).
- If the location of the drum does not indicate its contents, the label number can be used to identify the material. Records of the contents of each drum are kept in the HWMC. The emergency response is listed in this Attachment (3) in Section 3.4.
- If the label has been burned, the number painted on the drum can be used to identify the material.
- If the label and number are destroyed by fire, the the inventory in the HWMC office, should be used to identify drum contents. Unknown chemicals will be sampled and analyzed according to methods in WSMR Waste Analysis Plan and U.S. EPA "Test Methods for

Evaluating Solid Waste Physical Chemical Methods," SW-846, (most recent edition).

An appropriate spill absorbent will be poured over all chemical residues resulting from a hazardous waste fire. Once the liquid is absorbed, the waste will be swept or shoveled back in the appropriate containers using spark-less tools, and the surface will be cleaned using cleaners appropriate to the chemicals and in compliance with environmental requirements.

3.7.2 Explosion

The following procedures will be implemented in the event of a hazardous waste explosion or when a danger exists for a probable explosion.

- Immediately evacuate the area.
- The first responder will contact the WSMR Control Center. The IOSC will be notified immediately by the WSMR Control Center. IOSC will determine the appropriate response.
- Immediately transport any injured personnel to medical facility.
- The IOSC will remain near the site, but at a safe distance, so he can advise personnel responding to the explosion of the known hazards involved and the degree and location of the explosion.
- In the event of an explosion, the IOSC retains responsibility to select the fire-fighting methods and tactics. IOSC determines when the emergency action has been completed.
- The IOSC will be in overall control of WSMR-HWSF emergency response efforts.
- An appropriate spill absorbent will be poured over all chemical residues resulting from a hazardous waste release. Once the liquid is absorbed, the waste will be swept or shoveled back in appropriate containers using spark-less tools, and the surface will be cleaned using cleaners appropriate to the chemicals and in compliance with environmental requirements..

3.7.3 Spill or Material Release

WSMR will implement the following procedures in the event a hazardous waste or hazardous material spill where the spill causes an immediate health hazard, the spill cannot be contained with secondary containment or application of absorbents, or a threat exists for spilled material to move out of HWSF boundaries.

- First response is to protect human health and safety; the second response is to protect the environment.
- Evacuate the immediate area.
- Determine the identity and chemical nature of released material.
- Don appropriate personal protective equipment for exposure to the material.
- If possible, secure the source of the release.
- Build a dike to contain runoff, if appropriate.
- Contain the waste utilizing absorbent materials, if appropriate.
- If material/waste has contaminated the soil, the visibly contaminated soil will be drummed and treated as hazardous waste; the remaining soils are to be sampled in accordance with

SW-846 and analyzed for the contaminates listed in Table 2-2 in Permit Attachment 2.

- Waste is to be transferred to a salvage drum using spark-less tools and marked as hazardous waste. The waste is then transferred to appropriate conforming storage.
- During regular working hours, WSMR will immediately notify the NMED Hazardous Waste Bureau if human health or the environment is threatened; or after hours will contact NMED Spill Response. WSMR will notify the National Response Center (1-800-424-8802) if human health or the environment outside WSMR are threatened, or if the quantity of hazardous waste spilled is greater than the reportable quantity (RQ) specified in 40 CFR 302.
- Incompatible waste shall be managed in accordance with Permit Section II.J.

3.7.4 Prevention of Recurrence or Spread of Fires, Explosions, or Releases

The following information is provided in accordance with 40 CFR § 264.56 (e).

Actions to prevent the recurrence or spread of fires, explosions, or releases include stopping operations, collecting and containing released waste, and recovering or isolating containers. During an emergency, the IOSC will monitor other equipment not directly involved in the emergency for leaks, pressure build up, gas generation or ruptures that could encourage the spread of fire and/or explosions. An incident review will be conducted to identify root causes and any corrective measures identified will be implemented.

3.7.5 Storage and Treatment of Released Material

The following information is provided in accordance with 40 CFR § 264.56 (f) (g).

If the HWSF, or a portion of the facility, stops operations in response to either a minor or emergency event, IOSC will monitor, inspect and make a safety determination before operations commence again. Hazardous waste containers and equipment will be inspected for leaks, breaks, rupture, corrosion, bulges or dents. Such containers will be placed in overpack drums or the contents will be transferred to new containers, as conditions dictate.

Immediately after an emergency, WSMR will make arrangements for the proper handling and treatment of all recovered waste, contaminated soil, or other contaminated materials. Liquids that have accumulated in the containment system will be pumped into containers and stored in the container storage area. All other liquids and contaminated materials not within the containment system will also be collected in containers and stored in the container storage area. These items will be analyzed to determine proper disposition.

3.7.6 Incompatible Waste

Every effort is made to prevent the commingling of incompatible waste at the HWSF. No blending of waste is performed or planned. Preventive measures shall be conducted in accordance with Permit Section II.J

3.7.7 Post Emergency Equipment Maintenance

The following information is provided in accordance with 40 CFR § 264.56 (h) (2) (i).

Following an emergency, all equipment will be inspected to determine if it is clean, uncontaminated, and in working order. Those items not fit for use will be cleaned or replaced. All rinsate retrieved from cleaning of equipment after an emergency event will be collected in an area provided with a containment system. The residue will be adsorbed or collected and containerized, then stored as a hazardous waste in the proper area. When the inspection shows that adequate safety and emergency equipment are available, and before operations are resumed (40 CFR §265.56(j)), NMED will be notified that post-emergency equipment maintenance has been performed. Operations will then resume.

3.7.8 Container Spills and Leakage

Spills and leaks will be managed in accordance with 40 CFR § 264.56 (g) and 264.71.

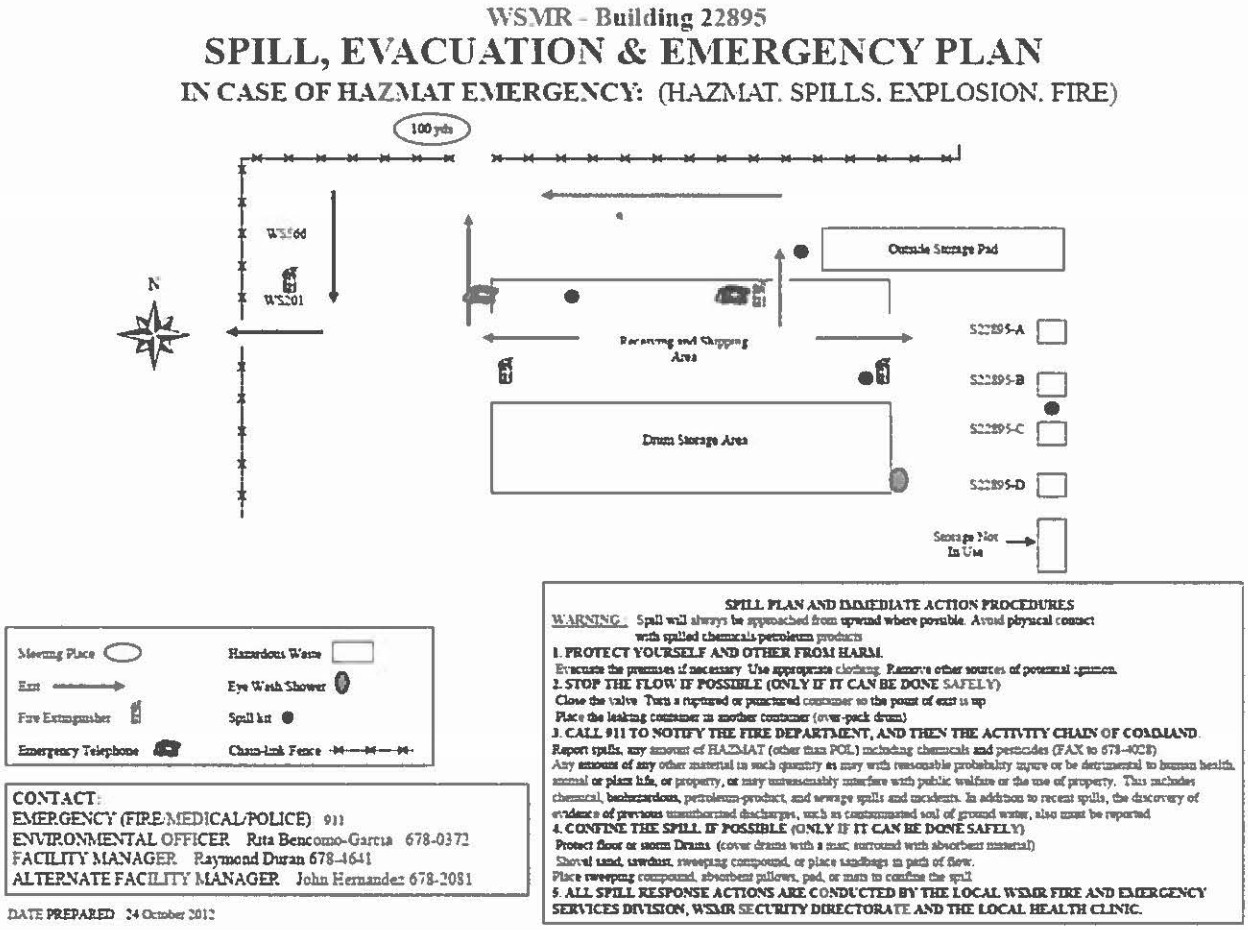
3.7.9 Evacuation Plan

This information is provided in accordance with 40 CFR 264.52 (f).

In the event of any major emergency, it will be necessary to follow an established set of procedures. Evacuation from the HWSF may be accomplished by means of exits in the building and the fenced compound. A person in an emergency would exit out the closest door and meet at the designated area, at least 100 yards (90 m) upwind, outside the facility boundary. The HWSF fire alarm and hand/voice signals will be used to initiate evacuation. An evacuation plan (Figure 3-1) for this facility is maintained and posted in Building S22895.

Figure 3-1. HWSF Evacuation Plan

A schematic of the Spill, Evacuation & Emergency Plan is shown below.



3.7.10 Required Reports

The following information is provided in accordance with 40 CFR § 264.56 (j).

Any emergency event that requires implementation of the Contingency Plan will be reported in writing within 15 days to NMED. The information to be included in this report includes:

- name, address, and telephone number of the owner or operator;
- name, address, and telephone number of the facility;
- date, time, and type of incident;
- name and quantity of materials involved;
- the extent of injuries, if any;
- an assessment of actual or potential hazards to human health or the environment, where applicable;
- estimated quantity and disposition of recovered material that resulted from the accident; and
- other information specifically requested by NMED, which is necessary and relevant to the purpose of an operating record.

As required by 40 CFR § 270.30 (k) (6), WSMR will report any noncompliance that may endanger health or the environment orally within 24 hours from the time WSMR becomes aware of the circumstances, including:

- information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies; and
- information concerning a release or discharge of hazardous waste or of a fire or explosion from the HWSF which could threaten the environment or human health outside the facility.

The description of the occurrence and its cause will include:

- name, address, and telephone number of the HWSF at WSMR;
- date, time, and type of incident;
- name and quantity of materials involved;
- the extent of injuries, if any;
- an assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;
- estimated quantity and disposition of recovered material that resulted from the incident;

In addition to these reporting requirements for state authorities, WSMR has internal reporting requirements. WSMR will perform required reporting within 24 hours as deemed necessary by quantity and area of influence to:

- Office of The GC Command Group;
- National Response Center;
- NMED;
- Region VI EPA, Dallas.

A written submission will be provided within 5 days of the time WSMR becomes aware of the circumstances. The written submission will contain:

- description of noncompliance and its cause;
- period of non-compliance including exact dates and times;
- if not corrected, anticipated time of incident correction; and
- steps taken or planned to be taken to reduce, eliminate and prevent recurrences.

3.7.11 Amendments of the Contingency Plan

The following information is provided in accordance with 40 CFR § 264.54.

The Contingency Plan will be reviewed and amended, as necessary, whenever:

- the facility permit is revised;
- the plan fails in an emergency;

- the facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes in the response necessary in any emergency;
- the list of emergency equipment changes;
- a training exercise identifies a deficiency in the plan, or
- when there is a change in emergency contact personnel.

A copy of the Contingency Plan is maintained at the facility.

3.7.12 Emergency Equipment

The following list of dedicated emergency equipment located at the HWSF is provided in accordance with 40 CFR § 264.52 (e):

- four, 95-gal (0.361 cu m), emergency spill response kits containing sock absorbents, pads, and pulp located on the pad;
- one spill kit for aggressive spills containing sock absorbents, pads, and pulp located at Building S22895;
- twelve sacks of absorbent;
- six recovery/overpack drums; and
- non-sparking shovels, picks, etc.

All of this equipment is stored in, or immediately outside Building S22895.

3.8 Arrangements with Local Authorities

20.4.1.500 NMAC, incorporating 40 CFR 264.37 (Arrangements with Local Authorities), specifies that a hazardous waste storage facility will make arrangements to familiarize local authorities, such as police, fire departments and emergency response teams, with the facility and possible scenarios. WSMR is a self-contained military base; therefore arrangements with local authorities, such as hospitals, fire or police, are not included in this contingency plan. Should an emergency response action necessitate transportation of personnel for medical attention not available at the on-base clinic, transportation to and treatment at a near-by military or community trauma facility would be arranged. Details of the on-site organization of internal departments to respond to emergencies are provided in the preceding sections.

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