

New Mexico Environment Department
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NASA WSTF RCRA Permit
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**ATTACHMENT 3
CONTINGENCY PLAN**

(PERMIT APPLICATION SECTION 10)

10.0 §§ 270.14(b)(7) and (b)(8) – Contingency Plan and Emergency Procedures

The WSTF Emergency Preparedness Plan (EPP) maintains emergency procedures designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents to the air, soil, or surface water per § 264.51(a-b). The EPP (provided in Appendix 10-A) has been amended to incorporate hazardous waste management provisions sufficient to comply with the requirements of § 264.52(b) "Content of Contingency Plan". Requirements unique to the hazardous waste operating units will be addressed below.

10.1 § 270.14(b)(7) - Contingency Plan Content Requirements Covered by the EPP

Table 10.1 provides the locations in the EPP where each of the Contingency Plan content requirements is located.

Table 10.1 Cross-Reference for Contingency Plan Requirements

| Reference | Contingency plan content requirement | Location in EPP |
|-------------|--|-----------------------|
| § 264.52(a) | Response to fires and explosions | Attachment F and Q |
| § 264.52(b) | Response to release of hazardous and hazardous constituent waste | Attachment Q |
| § 264.52(c) | Agreements | Attachment A* |
| § 264.52(d) | Name, address, and phone numbers (home and work) | Attachment Q, Table 1 |
| § 264.52(e) | Spill control, fire extinguishing, and decon equipment with location, description and capabilities | Attachment Q, Table 3 |
| § 264.52(e) | Alarms (external and internal) and communications equipment | Attachment A and B |
| § 264.52(f) | Evacuation plan | Attachment A and E |

* WSTF will provide the Local Emergency Planning Coordinator (LEPC), Office of Emergency Civil Preparedness, with copies of the Superfund Amendments and Reauthorization Act (SARA) III Tier II Report and the EPP. These documents cover the facility layout, hazardous areas/materials, and types of injuries/illnesses that may occur, access roads, and evacuation routes. When off-site mutual aid is needed the WSTF Incident Command System (ICS), Attachment Q, will utilize them in the appropriate positions. Mutual aid responders will receive a required Safety Briefing by the Incident Command prior to any deployment into hazardous areas.

10.2 § 270.14(b)(8) - Description of Procedures, Structures, or Equipment Used at the Facility

10.2.1 § 270.14(b)(8)(i) and (v) - Prevention of Hazards and Undue Personnel Exposure

Operations conducted at the ETU and FTU employ the following Safety/Training procedures. Work at the Units is assigned and described by the issuance and use of Task Memos or WJI procedures. These documents/procedures reference Job Hazard Analyses (JHAs) that identify the specific task's major steps, potential hazards, and recommended preventative measures. The personal protective equipment assigned to prevent exposure to hazardous waste is specified in the recommended preventative measures section of the JHA. Personnel protective equipment available for use includes vapor monitors, splash suits, aprons, face shields, goggles, hard hats, boots, gloves, totally encapsulating suits, and air-line tethered suits.

In addition, employees that perform operations at the Hazardous Waste Operating Units receive Hazardous Waste Handler (Section 14.3.11.7), Hazard Communication, Forklift, Personal Protective Equipment, Respiratory Equipment, Air Monitoring, Hazard Recognition, and special equipment training. The training is delivered as required by RCRA,

Occupational Safety and Health Administration (OSHA), and site policy and the records are stored and available electronically on the WSTF Training Database.

Drum hand carts, forklifts equipped with drum lifting tongs, or other suitable equipment will be used when drums are handled prior to unloading. Trucks with liftgates are available for transporting wastes, but when other trucks are used, forklifts can be used to load and unload containers from the trucks. Wheel chocks are used to stabilize transport vehicles during operations.

10.2.2 § 270.14(b)(8)(ii) - Prevention of Runoff and Flooding

All waste transfer operations to the units will be performed with pumps over the secondary containment. The use of pumps will minimize container handling, thereby minimizing the potential for spills. An elevated curb to contain any potential spills from unloading operations surrounds the area. This also assures that run-off from the area does not drain to the environment and run-on from other areas does not drain onto the container handling area.

The ETU has a secondary containment pad for spills and leaks. Accumulated rainwater is pumped into the tanks. Concrete/asphalt erosion control barriers prevent storm water run-on from over filling the pad.

The FTU has a secondary containment for the storage tanks and has an unloading/loading pad for any spills or leaks. Rainwater that accumulates in the secondary containment and unloading/loading pads is pumped and transferred to the ETU. There is no storm water run-on to the site.

10.2.3 § 270.14(b)(8)(iii) - Prevention of Water Supply Contamination

The site water delivery systems at both units have freeze protected back-flow preventers and/or check valves to prevent possible contamination of water supplies.

10.2.4 § 270.14(b)(8)(iv) - Mitigation of Effects of Equipment Failures and Power Outages

ETU and FTU pumps, tanks and piping are protected by secondary containment. Sight glasses are utilized to indicate spills, leaks or equipment failure. Unit inspections are performed daily and Health, Safety, and Environmental audits are carried out every five weeks. Equipment failures, when discovered, are entered into a Safety Inspection Management System database and corrective actions are assigned to the affected individuals for timely remediation. An alarm system (visual and automatic ring down telephone) associated with the ETU System and at the FTU will warn either the contractor Environmental Department or the WSTF Fire Department in the event of equipment or power failure.

In addition, the FTU tank system does not process hazardous waste when unattended thus an equipment failure or power outage will not affect the stored waste. The FTU system does not contain any automatic shut-off devices, therefore all waste transfers to the tanks will be performed manually with valves and pumps. In the event of an emergency, the waste in the storage tank(s) can be transferred to a portable trailer on-site.

Unplanned sudden releases of hazardous waste from the ETU or FTU will initiate response by the WSTF Fire Department for control and mitigation. The Incident Command System will be utilized in accordance with Attachment Q of the EPP (Appendix 10-A). Additionally, the NMED Hazardous Waste Bureau will be contacted and a report that includes planned mitigation will be communicated to the appropriate contact.

10.2.5 § 270.14(b)(8)(vi) - Prevention of Releases to the Atmosphere

The ETU is an open tank system that utilizes evaporation to treat hazardous waste. The generator profiles all waste streams at the point of generation that are treated at the ETU. Only hazardous waste streams that meet Subtitle CC regulation limits will be treated in the tanks and address § 264.200 air emission requirements.

The FTU storage tanks are connected to an activated carbon canister system that is designed to capture air emissions. The canisters are inspected weekly for break-through. The activated carbon will be manifested for off-site shipment and disposal once break-through has occurred. Additionally, the canister system is designed to meet the § 264.200 air emission requirements.

