

ATTACHMENT D
RCRA CONTINGENCY PLAN

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ATTACHMENT D

RCRA CONTINGENCY PLAN

Introduction

This attachment contains the *RCRA Contingency Plan* prepared in accordance with the Resource Conservation and Recovery Act (**RCRA**) requirements codified in 20.4.1.300 New Mexico Administrative Code (**NMAC**) (incorporating Title 40 of the Code of Federal Regulations (**CFR**) Part 262, Subpart M) and 20.4.1.500 NMAC (incorporating 40 CFR Part 264, Subpart D), "Contingency Plan and Emergency Procedures." The purpose of this document is to define responsibilities and to describe the coordination of activities necessary to minimize hazards to human health and the environment from fires, explosions, or any sudden or non-sudden release of hazardous waste, or hazardous waste constituents to air, soil, or surface water in accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.260(a)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.51 (a)). This plan consists of descriptions of emergency responses specific to contact-handled (**CH**) and remote-handled (**RH**) transuranic (**TRU**) mixed waste and site-generated hazardous waste handled at the WIPP facility.

Pursuant to 20.4.1.300 NMAC (incorporating 40 CFR §262.262(b)), the Permittees ensure that a copy of the *Quick Reference Guide to the WIPP Facility RCRA Contingency Plan* is maintained on file at the facility and is available to the emergency response organizations listed in Section D-2a, *Emergency Response Personnel*, and Section D-9, *Location of the RCRA Contingency Plan and Plan Revision*. Whenever the *RCRA Contingency Plan* is revised, the Permittees will update, if necessary, the quick reference guide and redistribute it in accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.262(c)).

D-1 Scope and Applicability

The regulated units at the WIPP facility subject to this permit include the hazardous waste management units (**HWMUs**) including the Waste Handling Building (**WHB**) Container Storage Unit (i.e., **WHB Unit**) and the Parking Area Container Storage Unit (i.e., **Parking Area Unit**), , and the hazardous waste disposal units (**HWDUs**) in the underground disposal panels.

Pursuant to 20.4.1.500 NMAC (incorporating 40 CFR §264.51(a)), owners/operators of treatment, storage, and disposal facilities are required to have formal contingency plans in place that describe actions that facility personnel will take in response to any fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. The contingency plan must meet the requirements of NMAC 20.4.1.500 NMAC (incorporating 40 CFR Part 264, Subpart D). The provisions of the *RCRA Contingency Plan* apply to HWDUs in the underground waste disposal panels, HWMUs in the WHB Unit and the Parking Area Unit, the Waste Shaft, and supporting TRU mixed waste handling areas. These areas are shown in Figures D-1 through D-3.

The WIPP facility is a large quantity generator of hazardous waste pursuant to 20.4.1.300 NMAC (incorporating 40 CFR Part 262, "Standards Applicable to Generators of Hazardous Waste"). 20.4.1.300 NMAC (incorporating 40 CFR §262.261(a)) requires that a contingency plan be in place that describes actions that facility personnel will take in response to any fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. The provisions of the *RCRA Contingency Plan* also apply to the site-generated hazardous waste accumulation areas (both the central accumulation areas

1 (CAAs), also referred to as the less-than-90-day areas, and satellite accumulation areas
2 (SAAs)), the locations of which are specified in the *Quick Reference Guide to the WIPP Facility*
3 *RCRA Contingency Plan*. For the remainder of this document, the term “site-generated
4 hazardous waste” will mean waste accumulated in both the CAAs and SAAs.

5 Wastes may also be generated at the WIPP facility as a direct result of managing the TRU and
6 TRU mixed wastes received from the off-site generators. Throughout the remainder of this plan,
7 this waste is referred to as “derived waste.” Derived waste will be placed in the rooms in
8 HWDUs along with the TRU mixed waste for disposal. Every reasonable effort to minimize the
9 amount of derived waste, while providing for the health and safety of personnel, will be made.

10 Wastes generated as a result of emergency response actions will be categorized into one of
11 three groups and disposed of accordingly. These are: 1) nonhazardous wastes to be disposed
12 of at an appropriate disposal facility (e.g., low-level waste facility or approved landfill), 2)
13 hazardous nonradioactive wastes (site-generated hazardous waste) to be disposed of at an off-
14 site RCRA permitted facility, and 3) derived waste to be disposed of in the underground HWDUs
15 as TRU mixed waste. Hazardous liquid wastes that may be generated as a result of emergency
16 response actions will be managed as follows:

- 17 • Non-Mixed - Accumulated liquids contaminated only with hazardous constituents
18 will be placed into containers and managed in accordance with 20.4.1.300 NMAC
19 (incorporating 40 CFR §262.17) requirements. The waste will be shipped to an
20 approved off-site treatment, storage, or disposal facility.
- 21 • Mixed – Accumulated liquids contaminated with TRU mixed waste will be solidified
22 and the solidified materials will be disposed of in the underground WIPP repository
23 as TRU mixed waste.

24 Waste containing liquid in excess of treatment, storage, or disposal facility Waste Acceptance
25 Criteria (**TSDF-WAC**) limits shall not be emplaced in the underground HWDUs (See Permit
26 Attachment C, Section C-1c).

27 Off-site waste managed and disposed of at the WIPP facility is radioactive mixed waste, and as
28 a result, response to emergencies must consider the dual hazard associated with this waste. In
29 responding to emergencies involving TRU mixed waste, the actions necessary to protect human
30 health and the environment from the effects of radioactivity may be similar to those actions
31 necessary to provide protection from hazardous waste and hazardous waste constituents. Such
32 responses may require the use of equipment and processes specific to events resulting in
33 radiological contamination (e.g., continuous air monitors, decontamination shower equipment,
34 HEPA vacuums, paint/fixatives) and are not included in the *RCRA Contingency Plan*.
35 Furthermore, the *RCRA Contingency Plan* may require additional actions to be taken to mitigate
36 the hazards associated with the hazardous component of the waste. These measures are not
37 intended to replace actions required to protect human health and the environment in response
38 to radiological emergencies. In this manner, the *RCRA Contingency Plan* complements the
39 radiological response activities.

1 D-2 Emergency Response Personnel and Training

2 D-2a Emergency Response Personnel

3 A RCRA Emergency Coordinator will be on-site at the WIPP facility 24 hours a day, seven days
4 a week, with the responsibility for coordinating emergency response measures. In accordance
5 with 20.4.1.300 NMAC (incorporating 40 CFR §262.261(d)) and 20.4.1.500 NMAC
6 (incorporating 40 CFR §264.52(d)), qualified RCRA Emergency Coordinators are listed in Table
7 D-1 and are trained to the requirements found in Permit Attachment F, under “Emergency
8 Coordinator”.

9 In addition, persons qualified to act as the RCRA Emergency Coordinator have the authority to
10 commit the necessary resources to implement this *RCRA Contingency Plan*.

11 During emergencies, the RCRA Emergency Coordinator has three primary responsibilities:

- 12 • **Assess the Situation**—The RCRA Emergency Coordinator shall gather information
13 relevant to the incident, such as the type of event, quantity and type of released
14 waste, and existing or potential hazards to human health and the environment.
- 15 • **Protect Personnel**—The RCRA Emergency Coordinator shall take reasonable
16 measures to ensure the safety of personnel, such as ensuring that alarms have
17 been activated, personnel have been accounted for, any injuries have been
18 attended to, and evacuation of personnel has occurred, if necessary.
- 19 • **Contain the Release**—The RCRA Emergency Coordinator shall take reasonable
20 measures to ensure that fires, explosions, or releases of hazardous waste or
21 hazardous waste constituents do not occur, recur, or spread.

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

- 24 • **WIPP Fire Department**—The primary providers of fire suppression, technical
25 rescue, Emergency Medical Services (EMS), and hazardous materials response
26 for the protection of personnel in both surface and underground facilities. The
27 WIPP Fire Department personnel serve as an Industrial Fire Brigade and are
28 trained to respond to surface and underground emergencies on site, including fires,
29 medical emergencies, and releases of hazardous materials.
- 30 • **Facility Shift Manager (FSM)**—A member of the Facility Operations organization
31 who is in charge of plant operations and is the senior shift representative
32 responsible for maintaining the facility in a safe configuration during normal and
33 abnormal conditions. The FSM can concurrently serve as the RCRA Emergency
34 Coordinator, if trained to the requirements of Permit Attachment F (*Facility
35 Personnel Permit Training Program*), or provide support to the qualified RCRA
36 Emergency Coordinator on shift.
- 37 • **Central Monitoring Room Operator (CMRO)**—An on-shift operator responsible for
38 Central Monitoring Room (CMR) operations, including coordination of facility
39 communications. The CMRO documents these activities (e.g., communications,

1 notifications) in a facility log. The CMRO is a member of Facility Operations, and
2 during emergencies, the CMRO supports the RCRA Emergency Coordinator.

- 3 • Firefighter—A WIPP Fire Department member who serves as a primary responder
4 to surface and underground emergencies, including fires, medical emergencies,
5 and releases of hazardous materials. Firefighters assigned to the underground will
6 not perform any coordinated firefighting underground and will only respond to
7 incipient-stage fires that threaten TRU mixed waste, if it is safe to do so.
- 8 • Fire Department Incident Commander—Upon delegation by the RCRA Emergency
9 Coordinator, and once incident command has been established, the Incident
10 Commander is responsible for direction and supervision of emergency responders
11 during an incident resulting in implementation of the *RCRA Contingency Plan*. The
12 Incident Commander will be a member of the WIPP Fire Department. For security-
13 related incidents that invoke implementation of the *RCRA Contingency Plan*, the
14 Fire Department Incident Commander will establish a unified command with the
15 WIPP Protective Force.
- 16 • Mine Rescue Team (MRT)— The MRT emergency response capabilities include
17 search, rescue, reentry, and recovery operations. The MRT responds in
18 accordance with the requirements of 30 CFR Part 49. The MRT emergency
19 response actions include extinguishing incipient stage fires, if encountered, and
20 immediately reporting uncontrolled fires.
- 21 • Emergency Operations Center (EOC) Staff- Upon activation, the EOC supports the
22 RCRA Emergency Coordinator and Incident Commander with emergency
23 management decision-making and associated notifications. Since EOC staff
24 performs duties similar to their normal job functions during an emergency response
25 and provides support related to their area(s) of expertise, no specific RCRA
26 training is required.

27 D-2b Emergency Response Training

28 The WIPP Fire Department personnel are trained in accordance with the *WIPP Fire Department*
29 *Training Plan*, which is kept on file at the WIPP facility. The training plan incorporates current
30 National Fire Protection Association (**NFPA**) standards for training Firefighters.

31 Fire Department Incident Commanders are also trained in accordance with the *WIPP Fire*
32 *Department Training Plan*, which incorporates the Federal Emergency Management Agency
33 (**FEMA**), Incident Command System (**ICS**), and the National Incident Management System
34 (**NIMS**) standards.

35 WIPP personnel who perform EMS duties are licensed through the State of New Mexico
36 Emergency Medical Systems Bureau. Licensure requirements for training, continuing education,
37 and skills maintenance are set forth through state requirements. Licenses are maintained by
38 attending training seminars or conferences.

39 As described above, emergency response training is conducted in accordance with the *WIPP*
40 *Fire Department Training Plan*, which is updated whenever the applicable standards are
41 revised. In addition to the emergency response training, WIPP Fire Department personnel are

1 required to complete applicable site-specific training, which is described in Permit Attachment F,
2 *Facility Personnel Permit Training Program*.

3 D-3 Criteria for Implementation of the *RCRA Contingency Plan*

4 The provisions of the *RCRA Contingency Plan* shall be implemented immediately whenever
5 there is a fire, an explosion, or a release of hazardous wastes or hazardous waste constituents
6 that could threaten human health or the environment, or whenever the potential for such an
7 event exists as determined by the RCRA Emergency Coordinator, as required under 20.4.1.300
8 NMAC (incorporating 40 CFR §262.260(b)) and 20.4.1.500 NMAC (incorporating 40 CFR
9 §264.51(b)).

10 There may be situations which do not readily lend themselves to an immediate assessment of
11 the possible hazards to human health and the environment. In these cases, the RCRA
12 Emergency Coordinator will implement the *RCRA Contingency Plan* as a precautionary
13 measure, regardless of the emergency situation or occurrence, if the RCRA Emergency
14 Coordinator has reason to believe that a fire, explosion, or release of hazardous waste or
15 hazardous waste constituents has occurred that could threaten human health or the
16 environment.

17 In accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.265(i)) and 20.4.1.500 NMAC
18 (incorporating 40 CFR §264.56(i)), the RCRA Emergency Coordinator, on behalf of the
19 Permittees, will record the time, date, and details of the incident that required implementation of
20 the *RCRA Contingency Plan*. The Secretary of the NMED will be immediately notified by the
21 Permittees. Additionally, the Permittees shall submit a written report to the NMED within 15
22 days of the incident, as specified in Section D-5. The following emergency situations, as they
23 pertain to TRU mixed waste and generated hazardous wastes, warrant immediate
24 implementation of the *RCRA Contingency Plan* by the RCRA Emergency Coordinator in
25 accordance with standard operating procedures on file at the WIPP facility:

- 26 • Fires
- 27 - If a fire involving TRU mixed waste or site-generated hazardous waste occurs
- 28 - If a fire (e.g., building, grass, nonhazardous waste fire) occurs within or near a CAA or
29 SAA that threatens to involve site-generated hazardous waste
- 30 - If a fire (e.g., building, grass, nonhazardous waste fire) occurs within or near the
31 permitted HWMUs that threatens to involve TRU mixed waste
- 32 - If a fire occurs in underground that results in immediate personnel evacuation or
33 prevents normal personnel access to the underground

34 For any fire which does not meet the above criteria, the RCRA Emergency Coordinator shall
35 document the rationale for not implementing the *RCRA Contingency Plan* (e.g., there is no
36 threat to human health or the environment).

- 37 • Explosions
- 38 - If an explosion involving TRU mixed waste or site-generated hazardous waste occurs

- 1 - If an explosion occurs within or near a CAA or SAA which threatens to involve site-
2 generated hazardous waste
- 3 - If an explosion occurs within or near the permitted HWMUs which threatens to involve
4 TRU mixed waste
- 5 - If an explosion occurs in the underground that results in immediate personnel evacuation
6 or prevents normal personnel access to the underground
- 7 - If there is an imminent danger of an explosion occurring (e.g., gas leak with an ignition
8 source nearby) which could involve TRU mixed or site-generated hazardous waste

9 For any explosion which does not meet the above criteria, the RCRA Emergency Coordinator
10 shall document the rationale for not implementing the *RCRA Contingency Plan* (e.g., there is
11 no threat to human health or the environment).

12 • **Unplanned Sudden/Non-Sudden Releases**

- 13 - If, prior to waste emplacement, one or more containers of TRU mixed waste has spilled
14 or been breached due to dropping, puncturing, container failure or degradation, or any
15 other physical or chemical means, resulting in a release
- 16 - If, after waste emplacement, one or more containers of TRU mixed waste in an active
17 room has been breached
- 18 - If a continuous air monitor confirms a release of radioactive particulates to the ambient
19 atmosphere, indicating a possible release of TRU mixed waste constituents from the
20 permitted facility
- 21 - If a spill of site-generated hazardous waste occurs in a CAA or SAA and cannot be
22 contained with secondary containment methods or absorbents, thereby threatening a
23 release to air, soil, or surface water
- 24 - If a site-generated hazardous waste spill occurs in a CAA or SAA and results in the
25 release of potentially flammable material, thereby threatening to create a fire or
26 explosion hazard
- 27 - If a site-generated hazardous waste spill occurs in a CAA or SAA and results in the
28 release of potentially toxic fumes that would threaten human health

29 For any release of hazardous waste or hazardous waste constituents that does not meet the
30 above criteria, the RCRA Emergency Coordinator shall document the rationale for not
31 implementing the *RCRA Contingency Plan* (e.g., there is no threat to human health or the
32 environment).

33 • **Other Occurrences**

- 34 - If a natural phenomenon (e.g., earthquake, flood, lightning strike, tornado) occurs that
35 involves TRU mixed waste or site-generated hazardous waste or threatens to involve
36 TRU mixed waste or site-generated hazardous waste

- 1 - If an underground structural integrity emergency (e.g., roof fall in an active room) occurs
2 that involves TRU mixed waste or site-generated hazardous waste, threatens to involve
3 TRU mixed waste or site-generated hazardous waste, results in immediate personnel
4 evacuation, or prevents normal personnel access to the underground

5 For any natural phenomenon or underground structural emergency that does not meet the
6 above criteria, the RCRA Emergency Coordinator shall document the rationale for not
7 implementing the *RCRA Contingency Plan* (e.g., there is no threat to human health or the
8 environment).

9 D-4 Emergency Response Method

10 Methods that describe implementation of the *RCRA Contingency Plan* cover the following six
11 areas:

- 12 1. *Immediate Notifications* (Section D-4a)
13
14 2. *Identification of Released Materials and Assessment of Extent of Emergency* (Section
15 D-4b)
16
17 3. *Assessment of the Potential Hazards* (Section D-4c)
18
19 4. *Post-Assessment Notifications* (Section D-4d)
20
21 5. *Control and Containment of the Emergency* (Section D-4e)
22
23 6. *Post-Emergency Activities* (Section D-4f)
24

25 D-4a Immediate Notifications

26 Notification requirements in the event of implementation of the *RCRA Contingency Plan* are
27 defined by 20.4.1.300 NMAC (incorporating 40 CFR §262.265(a)) and 20.4.1.500 NMAC
28 (incorporating 40 CFR §§264.56(a)). Personnel at the WIPP facility are trained to respond to
29 emergency notifications.

30 Whenever an emergency situation occurs that warrants implementation of this *RCRA*
31 *Contingency Plan*, as described in Section D-3, the Permittees will immediately notify the
32 Secretary of the NMED.

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

34 The first person to become aware of an incident shall immediately report the situation to the
35 CMRO and, as requested by the CMRO, provide the relevant information. Facility personnel are
36 trained in the process for notifying the CMRO as part of General Employee Training (**GET**).

37 In addition to receiving incident reports from facility personnel, the CMRO continuously monitors
38 (24 hours a day) the status of alarms, takes telephone calls and radio messages, initiates calls
39 to emergency staff, and initiates emergency response procedures regarding evacuation, if
40 needed.

1 Once the CMRO is notified of a fire, explosion, or a release anywhere in the facility (either by
2 eyewitness notification or an alarm), the RCRA Emergency Coordinator is immediately notified.
3 The RCRA Emergency Coordinator ensures that the emergency responders, including the
4 WIPP Fire Department and the MRT, have been notified, as needed. Once incident command
5 has been established, the RCRA Emergency Coordinator has the authority to delegate the
6 responsibilities for mitigation of the incident to the Incident Commander.

7 The response to an unplanned event will be performed in accordance with standard operating
8 procedures and guides based on the applicable Federal, State, or local regulations and/or
9 guidelines for that response. These include DOE Order 151.1D, *Comprehensive Emergency*
10 *Management System*; the U.S. Mine Safety and Health Administration (**MSHA**); NMAC;
11 Comprehensive Environmental Response, Compensation, and Liability Act; Chapter 74, Article
12 4B, New Mexico Statutes Annotated 1978; and the New Mexico Emergency Management Act.

13 If needed, the RCRA Emergency Coordinator will immediately notify the appropriate federal,
14 state, and local agencies and mining companies in the vicinity of the WIPP facility, listed in
15 Section D-7, with designated response roles.

16 Depending on the emergency, the EOC may be activated for additional support. In the event
17 that the EOC is activated, decision-making responsibilities related to emergency management
18 and associated notifications may be delegated to the EOC by the RCRA Emergency
19 Coordinator. The EOC will assist in the mitigation of the incident with the use of appropriate
20 communications equipment and technical expertise from available resources. During the
21 emergency, the RCRA Emergency Coordinator will remain in contact with and advise the EOC
22 of the known hazards.

23 The EOC staff assesses opportunities for coordination and the use of mutual-aid agreements
24 with local agencies making additional emergency personnel and equipment available (Section
25 D-7), as well as the use of specialized response teams available through various State and
26 Federal agencies. Because the WIPP facility is a DOE-owned facility, the Permittees may also
27 use the resources available from the *National Response Framework*.

28 D-4a(2) Communication of Emergency Conditions to Facility Employees

29 Procedures for immediately notifying facility personnel of emergencies are as follows:

- 30 • Local Fire Alarms

31 The local fire alarms sound an audible tone and may be activated automatically or
32 manually in the event of a fire.

- 33 • Surface Evacuation Signal

34 The evacuation signal is a yelp tone and is manually activated by the CMRO when
35 needed. The CMRO follows the evacuation signal with verbal instructions and ensure
36 the Site Notification System has been activated.

- 37 • Underground Evacuation Warning System

38 The underground evacuation signal is a yelp tone and flashing strobe light. In the
39 event of an evacuation signal, underground personnel will follow escape routes to

1 egress hoist stations. Underground personnel are trained to report to the underground
2 assembly areas and await further instruction if all power fails or if ventilation stops. If
3 evacuation of underground personnel is required, this will be done using the backup
4 generators and in accordance with the applicable requirements of MSHA.

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

10 11 D-4b Identification of Released Materials and Assessment of the Extent of the Emergency

12 The identification of hazardous wastes or hazardous waste constituents involved in a fire, an
13 explosion, or a release to the environment is a necessary part of the RCRA Emergency
14 Coordinator's assessment of an incident, as described in 20.4.1.300 NMAC (incorporating 40
15 CFR §262.265(b)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56(b)). Immediately after
16 alarms have been activated and required notifications have been made, the RCRA Emergency
17 Coordinator shall direct an investigation to determine pertinent information relevant to the actual
18 or potential threat posed to human health or the environment. The information will include the
19 character, exact source, amount, and areal extent of any released material. This may be done
20 by observation or review of facility records or manifests and, if necessary, by chemical analysis.

21 The identification of the character and source of released materials at any location is enhanced
22 because hazardous wastes are stored, managed, or disposed at specified locations throughout
23 the WIPP facility.

24 Sources of information available to identify the hazardous wastes involved in a fire, an
25 explosion, or a release at the WIPP facility include operator/supervisor knowledge of their work
26 areas, materials used, and work activities underway; the WIPP Waste Information System
27 (**WWIS**), which identifies the location within the facility of emplaced TRU mixed waste, including
28 emplaced derived waste; and waste manifests and other waste characterization information in
29 the operating record. The WWIS also includes information on wastes that are in the waste
30 handling process. Also available are Safety Data Sheets (SDSs) for hazardous materials in the
31 various user areas throughout the facility, waste acceptance records, and materials inventories
32 for buildings and operating groups at the WIPP facility. Information or data from the derived
33 waste accumulation areas, the site-generated hazardous waste accumulation areas, and
34 nonregulated waste accumulation areas are included. It is anticipated that this information is
35 sufficient for identifying the nature and extent of the released materials. The RCRA Emergency
36 Coordinator has access to this information when needed.

37 The waste received at the WIPP facility must meet TSDF-WAC (e.g., no more than one percent
38 liquid), which minimizes the possibility of waste container degradation and liquid spills. Should a
39 spill or release occur from a container of site-generated hazardous or TRU mixed waste,
40 following an initial assessment of the event, the RCRA Emergency Coordinator will ensure that
41 the following actions are immediately taken, consistent with radiological control procedures, in
42 compliance with 20.4.1.300 NMAC (incorporating 40 CFR §262.261(a)) and 20.4.1.500 NMAC
43 (incorporating 40 CFR §264.52(a) and §264.171):

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

8 D-4c Assessment of the Potential Hazards

9 Concurrent with the actions described in Sections D-4a and D-4b, and in accordance with
10 20.4.1.300 NMAC (incorporating 40 CFR §262.265(c)) and 20.4.1.500 NMAC (incorporating 40
11 CFR §264.56(c)), the RCRA Emergency Coordinator shall assess possible hazards to human
12 health or the environment that may result from the release, fire, or explosion. This assessment
13 will consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of
14 any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous
15 surface water run-off from water or chemical agents used to control fire and heat-induced
16 explosions). The RCRA Emergency Coordinator will be responsible for identifying and
17 responding to immediate and potential hazards, using the services of trained personnel.

18 After the materials involved in an emergency are identified, the specific information (e.g.,
19 associated hazards, appropriate personal protective equipment (**PPE**), decontamination) may
20 be obtained from SDSs and from appropriate chemical reference materials at the same location.
21 These information sources are available to the RCRA Emergency Coordinator or may be
22 accessed through several WIPP facility organizations.

23 If, upon completion of the hazards assessment, the RCRA Emergency Coordinator determines
24 that there are no actual or potential hazards to human health or the environment present, this
25 *RCRA Contingency Plan* may be terminated. The RCRA Emergency Coordinator will record the
26 time, date, and details of the incident in the operating record, and the Permittees will ensure that
27 the reporting requirements of Section D-5 are fulfilled.

28 D-4d Post-Assessment Notifications

29 Upon *RCRA Contingency Plan* implementation, post-assessment notifications may be
30 necessary in order to satisfy 20.4.1.300 NMAC (incorporating 40 CFR §262.265(d)) and
31 20.4.1.500 NMAC (incorporating 40 CFR §264.56(d)). If it has been determined that the facility
32 has had a fire, an explosion, or a release of hazardous waste or hazardous waste constituents
33 that could threaten human health or the environment outside the facility (i.e., outside the Land
34 Withdrawal Boundary), the RCRA Emergency Coordinator, after consultation with the DOE as
35 the owner of the facility, will ensure that the appropriate local authorities are immediately notified
36 by telephone and/or radio in the event that evacuation is needed. The following notifications
37 satisfy the requirements of 20.4.1.300 NMAC (incorporating 40 CFR §262.265(d)(1)) and
38 20.4.1.500 NMAC (incorporating 40 CFR §264.56(d)(1)):

- 39 • New Mexico Department of Homeland Security and Emergency Management (telephone
40 number: (505) 476-9635)

41

- 1 • Eddy County via the Regional Emergency Dispatch Authority (telephone number: (575)
2 616-7155)
3
- 4 • Lea County via the Regional Emergency Dispatch Authority (telephone number: (575)
5 397-9265)

6 The RCRA Emergency Coordinator must be available to help appropriate officials decide
7 whether local areas should be evacuated.

8 After local authorities are notified, the RCRA Emergency Coordinator must immediately notify
9 either the government official designated as the on-scene coordinator for that geographical
10 area, or the National Response Center. For the purposes of the *RCRA Contingency Plan*, the
11 following notifications satisfy the requirements of 20.4.1.300 NMAC (incorporating 40 CFR
12 §262.265(d)(2)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56(d)(2)):

- 13 • New Mexico Environment Department (NMED)
14 Department of Public Safety
15 24-Hour Emergency Reporting Telephone Number: (505) 827-9329
16 FAX number: (505) 827-9368
17
- 18 • National Response Center
19 Telephone number: 1-800-424-8802
20 FAX number: (202) 479-7181

21 This notification shall include the following information:

- 22 • The name and phone number of the reporter
- 23 • The name and address of the facility
- 24 • The type of incident (fire, explosion, or release)
- 25 • The date and time of the incident
- 26 • The name and quantity of material(s) involved, to the extent known
- 27 • The extent of injuries, if any
- 28 • Possible hazards to human health and the environment (air, soil, water, wildlife, etc.)
29 outside the facility

30 Communications beyond those required by the *RCRA Contingency Plan* are the responsibility of
31 the Permittees in accordance with plans and policies on file at the WIPP facility.

32 D-4e Control and Containment of the Emergency

33 The RCRA Emergency Coordinator is required to ensure control of an emergency and to
34 minimize the potential for the occurrence, recurrence, or spread of releases due to the
35 emergency situation, as described in 20.4.1.300 NMAC (incorporating 40 CFR §262.265(e) and
36 (f)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56 (e) and (f)). Standard operating
37 procedures and guides are used to implement initial response measures with priority being

1 control of the emergency, and those actions necessary to ensure confinement and containment
2 in the early, critical stages of a spill or leak. The RCRA Emergency Coordinator, in conjunction
3 with the Incident Commander, is responsible for implementing the following measures:

- 4 • Stopping processes and operations
- 5 • Collecting and containing released wastes and materials
- 6 • Removing or isolating containers of hazardous waste posing a threat
- 7 • Ensuring that wastes managed during an emergency are handled, stored, or treated with
8 due consideration for compatibility with other wastes and materials on site and with
9 containers utilized (Section D-4f(2))
- 10 • Restricting personnel not needed for response activities from the scene of the incident
- 11 • Evacuating the area
- 12 • Curtailing nonessential activities in the area
- 13 • Conducting preliminary inspections of adjacent facilities and equipment to assess
14 damage
- 15 • Maintaining fire equipment on standby at the incident site in cases where ignitable
16 liquids have been or may be released and ensuring that ignition sources are kept out of
17 the area. Ignitable liquids will be segregated, contained, confined, diluted, or otherwise
18 controlled to preclude inadvertent explosion or detonation.

19 No operation that has been shut down in response to the incident will be restarted until
20 authorized by the RCRA Emergency Coordinator. If a release occurs that involves radioactivity,
21 the RCRA Emergency Coordinator actions will be consistent with radiation control policies and
22 practices.

23 The standard operating procedures for emergency response may include, but are not limited to,
24 the following actions appropriate for control of releases:

- 25 1. Isolating the area from unauthorized entry by fences, barricades, warning signs, or
26 other security and site control precautions. Isolation and evacuation distances vary,
27 depending upon the chemical/product, fire, and weather situations.
- 28 2. Establishing drainage controls.
- 29 3. Stabilizing physical controls (such as dikes or impoundment[s]).
- 30 4. Capping contaminated soils to reduce migration.
- 31 5. Using chemicals and other materials to retard the spread of the release or to mitigate
32 its effects.
- 33 6. Excavating, consolidating, or removing contaminated soils.

1 7. Removing wastes containers to reduce exposure risk during situations such as fires.

2 If the facility stops operations in response to a fire, explosion, or release, the RCRA Emergency
3 Coordinator shall ensure continued monitoring for leaks, pressure buildup, gas generation, or
4 ruptures in valves, pipes, or other equipment, wherever appropriate.

5 Natural and/or synthetic methods will be employed to limit the releases of hazardous wastes or
6 hazardous waste constituents so that effective recovery and treatment can be accomplished
7 with minimal additional risk to human health or the environment.

8 Emergency response actions taken to mitigate releases may include, but are not limited to, the
9 following:

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

- 12 a. Absorption (e.g., absorbent sheets; spill control bucket materials specifically for
13 solvents, neutralization, or acids/caustics; and absorbent socks for general liquids
14 or oils)
- 15 b. Dikes or Diversions (e.g., absorbent socks or earth)
- 16 c. Overpacking
- 17 d. Plug and Patch
- 18 e. Transfers from leaking container to new container f. Vapor Suppression (e.g.,
19 aqueous foam blanket)

20 2. Chemical methods of mitigation may include the following:

- 21 a. Neutralization
- 22 b. Solidification

23 Once the Incident Commander informs the RCRA Emergency Coordinator that the emergency
24 scene is stable, the release has been stopped, any reactions have been controlled, the released
25 hazardous materials have been contained within a localized area, and the area of contamination
26 has been secured from unauthorized entry, the field emergency response activity can be
27 terminated.

28 D-4e(1) Fires

29 In the event of a fire that involves or threatens TRU mixed waste or site-generated hazardous
30 waste, emergency response actions may include, but are not limited to, the following:

- 31 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident
32 Commander of the known hazards.
- 33 2. The Incident Commander will maintain overall control of the emergency and may
34 accept and evaluate the advice of WIPP facility personnel and emergency response

1 organization members, but retains overall responsibility until the emergency is
2 terminated.

3 3. Only fire extinguishing materials that are compatible with the materials involved in the
4 fire will be used to extinguish fires. Water and dry chemical materials have been
5 determined to be compatible with all components of the TRU mixed waste and site-
6 generated hazardous waste.

7 4. In order to ensure that storm drains and/or sewers do not receive potentially
8 hazardous runoff, dikes will be built around storm drains to control discharge as
9 needed. Collected waste will be sampled and analyzed for hazardous constituents,
10 and appropriately disposed.

11 5. The RCRA Emergency Coordinator will ensure that measures are taken to shut down
12 operational units (e.g., process equipment and ventilation equipment) that have been
13 affected directly or indirectly by the fire.

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

17 7. Upon underground evacuation due to a fire in the underground that involves or
18 threatens to involve TRU mixed waste or site-generated hazardous waste, a response
19 plan will be developed depending on the status of the fire. The plan may include
20 ventilation control, barrier erection, and waiting for the fire to self-extinguish or
21 implement active ventilation.

22 D-4e(2) Explosions

23 In the event of an explosion that involves or threatens TRU mixed waste or site-generated
24 hazardous waste, emergency response actions may include, but are not limited to, the following:

25 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident
26 Commander of the known hazards.

27 2. The Incident Commander will maintain overall control of the emergency and may
28 accept and evaluate the advice of WIPP facility personnel and emergency response
29 organization members, but retains overall responsibility until the emergency is
30 terminated.

31 3. The RCRA Emergency Coordinator will ensure measures are taken to shut down
32 operational units (e.g., process equipment and ventilation equipment) that have been
33 affected directly or indirectly by the explosion.

34 4. If, following an explosion, there is an ensuing fire, see Section D-4e(1).

35 5. If, following an explosion, there is an underground structural integrity emergency, see
36 Section D-4e(4).

1 D-4e(3) _____ Unplanned Sudden/Non-Sudden Releases

2 Spills of Site-Generated Hazardous Waste

3 If a spill of site-generated hazardous waste has occurred, and 1) the spill cannot be contained
4 with secondary containment methods or absorbents, 2) the spill causes a release of flammable
5 material, or 3) the spill results in toxic fumes, the RCRA Emergency Coordinator will ensure
6 implementation of measures that may include, but are not limited to, the following actions:

- 7 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident
8 Commander of the known hazards.
- 9 2. The Incident Commander will maintain overall control of the emergency and may
10 accept and evaluate the advice of WIPP facility personnel and emergency response
11 organization members, but retains overall responsibility until the emergency is
12 terminated.
- 13 3. The immediate area will be evacuated.
- 14 4. The source of the release will be mitigated, if possible.
- 15 5. A dike to contain runoff will be built, if necessary.
- 16 6. Dikes around storm drains to control discharge will be built, as needed, to ensure that
17 storm drains and/or sewers do not receive potentially hazardous runoff.
- 18 7. Fire equipment will be maintained on standby at the incident site in cases where
19 ignitable liquids have been or may be released, and ignition sources will be kept out of
20 the area of ignitable liquids.
- 21 8. Released waste and contaminated media will be collected and placed into drums or
22 other appropriate containers.

23 Releases of TRU Mixed Waste

24 If a release of TRU mixed waste has occurred, the emergency will be managed as a potential
25 radiological release, and radiological control measures will determine the activities that can be
26 performed safely, which may include the following:

- 27 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident
28 Commander of the known hazards.
- 29 2. The Incident Commander will maintain overall control of the emergency and may
30 accept and evaluate the advice of WIPP facility personnel and emergency response
31 organization members, but retains overall responsibility until the emergency is
32 terminated.
- 33 3. Prior to the re-entry following an event involving containers that are managed as TRU
34 mixed waste, a Radiological Work Permit (**RWP**) will be prepared.

- 1 4. During the re-entry phase, the extent of radiological contamination will be determined.
2 This information is used by the RCRA Emergency Coordinator to determine an
3 appropriate course of action to recover the area.
- 4 5. During the recovery phase, the necessary resources to conduct decontamination
5 and/or overpacking operations will be used as needed.
- 6 6. Prior to returning the affected area and/or equipment to normal activities, the RCRA
7 Emergency Coordinator will determine if additional measures are required by the
8 *RCRA Contingency Plan* (e.g., characterization and disposal of contaminated media).
- 9 7. The recovery phase will include activities (e.g., placing the waste material in another
10 container, vacuuming the waste material, overpacking or plugging/patching the
11 affected waste container(s), decontaminating or covering the affected area), as
12 specified in the RWP, to minimize the spread of contamination to other areas.
- 13 8. The RWPs and other administrative controls will provide protective measures to help
14 ensure that new hazardous constituents will not be added during decontamination
15 activities.

16 D-4e(4) Other Occurrences

17 Natural Phenomena

18 In the event of a natural phenomenon (e.g., earthquake, flood, lightning strike, tornado) that
19 involves hazardous waste or has threatened to cause a release of hazardous waste or
20 hazardous waste constituents, emergency response actions may include, but are not limited to,
21 the following:

- 22 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident
23 Commander of the known hazards.
- 24 2. The Incident Commander will maintain overall control of the emergency and may
25 accept and evaluate the advice of WIPP facility personnel and emergency response
26 organization members, but retains overall responsibility until the emergency is
27 terminated.
- 28 3. Containers which have not been disposed will be inspected for signs of leakage or
29 damage, and containment systems will be inspected for deterioration.
- 30 4. Affected equipment or areas associated with hazardous waste management activities
31 will be inspected, and the operability of monitoring systems will be ensured.
- 32 5. Affected electrical equipment and lines will be inspected for damage.
- 33 6. Affected buildings and fencing directly related to hazardous waste management
34 activities will be inspected for damage.
- 35 7. A general survey of the site will be conducted to check for signs of physical damage.

- 1 8. The RCRA Emergency Coordinator will ensure that measures are taken to shut down
2 operational units (e.g., process equipment and ventilation equipment) that have been
3 affected by the natural phenomenon.

4 Underground Structural Integrity Emergencies

5 In the event of an underground structural integrity emergency that involves or threatens TRU
6 mixed waste (i.e., occurs in an active disposal room) or site-generated hazardous waste, the
7 emergency will be managed as a potential radiological release, and radiological control
8 measures will determine the activities that can be performed safely, and may include the
9 following:

- 10 1. The RCRA Emergency Coordinator will remain in contact with and advise the Incident
11 Commander of the known hazards.
- 12 2. The Incident Commander will maintain overall control of the emergency and may
13 accept and evaluate the advice of WIPP facility personnel and emergency response
14 organization members, but retains overall responsibility until the emergency is
15 terminated.
- 16 3. The RCRA Emergency Coordinator will ascertain whether the roof conditions allow for
17 safe entry and if the waste container or containers in question are accessible.
- 18 4. The RCRA Emergency Coordinator may recommend closing the entire panel, or the
19 affected room of waste containers, based on the location of the event and the stability
20 of the roof and walls in the panel as a method to ensure that measures are taken to
21 shut down affected operational units.
- 22 5. Access to the ventilation flow path downstream of the incident will be restricted, as
23 appropriate.
- 24 6. Ventilation to the affected room will be restricted to ensure that there is no spread of
25 contamination that may have been released, as appropriate.
- 26 7. Accessible containers will be inspected for signs of leakage or damage.
- 27 8. The spill area will be covered with material (e.g., plastic, fabric sheets) in a manner
28 that safely isolates the contamination in the area.
- 29 9. The RCRA Emergency Coordinator will determine if the covered spill area safely
30 allows for continued waste disposal operations or whether further action is required to
31 reinitiate operations.

32 D-4f Post-Emergency Activities

33 Immediately after the emergency, and once initial release or spill control and containment have
34 been completed, the RCRA Emergency Coordinator will ensure that necessary decontamination
35 occurs and that recovered hazardous waste is properly managed, stored, and/or disposed, as
36 required by 20.4.1.300 NMAC (incorporating 40 CFR §262.265(g)) and 20.4.1.500 NMAC
37 (incorporating 40 CFR §264.56(g)). As required by 20.4.1.300 NMAC (incorporating 40 CFR
38 §262.265(h)) and 20.4.1.500 NMAC (incorporating 40 CFR §264.56(h)), the RCRA Emergency

1 Coordinator will ensure that incompatibility of waste and restoration of emergency equipment
2 are addressed.

3 D-4f(1) Management and Disposition of Released Material

4 When a release of TRU mixed waste has occurred, priority is given to actions required to
5 minimize radiological exposure to workers and the public. In most cases, these actions are
6 sufficient to mitigate any health effects associated with contamination by hazardous waste or
7 hazardous waste constituents.

8 If a release of site-generated hazardous waste occurs, the contaminated surface will be
9 cleaned, and decontamination materials will be placed in containers and dispositioned
10 appropriately. If the release is TRU mixed waste, decontamination and disposition will be in
11 accordance with the RWP.

12 If radioactive contamination is detected on equipment or on structures, radiological cleanup
13 standards will be used to determine the effectiveness of decontamination efforts and/or the final
14 disposition of the equipment or structures. Many types of equipment are difficult to
15 decontaminate and may have to be discarded as derived waste. Fixatives (e.g., paint or water
16 spray on salt in the underground) may be used on contaminated structures if the contamination
17 cannot be safely removed.

18 Following decontamination, the RCRA Emergency Coordinator will ensure that nonradioactive
19 hazardous waste resulting from the cleanup of a fire, an explosion, or a release involving a
20 nonradioactive hazardous waste at the WIPP facility will be contained and managed as a
21 hazardous waste until such time as the waste is disposed of, or determined to be
22 nonhazardous, as defined in 20.4.1.200 NMAC (incorporating 40 CFR Part 261, Subparts C and
23 D). In most cases, knowledge of the material inventories for the various buildings and areas at
24 the facility will allow a hazardous waste determination for the material resulting from the cleanup
25 of a release. When knowledge of the material inventories is not sufficient, samples of the waste
26 will be collected and analyzed using U.S. Environmental Protection Agency (**EPA**)-approved
27 methods to determine the presence of any hazardous characteristics and/or hazardous waste
28 constituents.

29 D-4f(2) Incompatible Waste

30 The RCRA Emergency Coordinator will ensure, in accordance with 20.4.1.300 NMAC
31 (incorporating 40 CFR §262.262(h)(1)) and 20.4.1.500 NMAC (incorporating 40 CFR
32 §264.56(h)(1)), that in the affected area(s) of the facility, no waste that may be incompatible with
33 the released material is treated, stored, or disposed of until cleanup has been completed. The
34 RCRA Emergency Coordinator will not allow hazardous or TRU mixed waste operations to
35 resume in a building or area in which incompatible materials have been released prior to
36 completion of necessary post-emergency cleanup operations to remove potentially incompatible
37 materials. In making the determination of compatibility, the RCRA Emergency Coordinator will
38 have available the resources and information described in Section D-4b, *Identification of*
39 *Released Materials and Assessment of the Extent of the Emergency*.

40 D-4f(3) Cleaning and Restoration of Equipment

41 The RCRA Emergency Coordinator will take measures to ensure, in accordance with 20.4.1.300
42 NMAC (incorporating 40 CFR §262.262(h)(2)) and 20.4.1.500 NMAC (incorporating 40 CFR

1 §264.56(h)(2)), that in the affected area(s) of the facility, emergency equipment listed in the
2 *RCRA Contingency Plan*, and used in the emergency response, is cleaned and fit for its
3 intended use or replaced before operations are resumed.

4 Any equipment that cannot be decontaminated will be discarded as waste (e.g., hazardous,
5 mixed, solid), as appropriate. After the equipment has been cleaned, repaired, or replaced, a
6 post-emergency facility and equipment inspection will be performed, and the results will be
7 documented.

8 D-5 Required Reporting

9 The RCRA Emergency Coordinator, on behalf of the Permittees, will note in the operating
10 record the time, date, and details of the incident that required implementation of the *RCRA*
11 *Contingency Plan*. In compliance with 20.4.1.300 NMAC (incorporating 40 CFR §262.265(i))
12 and 20.4.1.500 NMAC (incorporating 40 CFR §264.56(i)), within 15 days after the incident, the
13 Permittees will ensure that a written report on the incident will be submitted to the Secretary of
14 the NMED. The report will include:

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

24 D-6 Emergency Equipment

25 A variety of equipment is available at the facility for emergency response, containment, and
26 cleanup operations in the surface HWMUs, the underground HWDUs, and the WIPP facility in
27 general. This includes equipment for spill control, fire control, personnel protection, monitoring,
28 first aid and medical attention, communications, and alarms. This equipment is immediately
29 available to emergency response personnel. A listing of major emergency equipment available
30 at the WIPP facility, as required by 20.4.1.300 NMAC (incorporating 40 CFR §262.261(e)) and
31 20.4.1.500 NMAC (incorporating 40 CFR §264.52(e)), is shown in Table D-2. Table D-2 also
32 includes the location and a physical description of each item on the list along with a brief outline
33 of its capabilities. The fire-water distribution system map is show in Figure D-5. Equipment
34 specified at the locations listed in Table D-2 are inspected in accordance with the inspection
35 schedule specified in Attachment E, Table E-1, as required by 20.4.1.500 NMAC (incorporating
36 40 CFR §264.15(b)).

1 D-7 Emergency Response Agreements

2 The Permittees have established agreements with federal, state, and local emergency response
3 agencies and mining companies in the vicinity of the WIPP facility for firefighting, medical
4 assistance, hazardous materials response, and law enforcement. In the event that on-site
5 response resources are unable to provide the needed response actions during a medical, fire,
6 hazardous materials, or security emergency, the RCRA Emergency Coordinator will notify
7 appropriate response agencies and request assistance. Once on site, emergency response
8 agency personnel will perform emergency response activities under the direction of the Incident
9 Commander.

10 The agreements with federal, state, and local agencies and mining companies in the vicinity of
11 the WIPP facility for emergency response capabilities are on file at the WIPP facility. Additional
12 agreements may be established when needed. A description of the agreements with federal,
13 state, and local agencies and mining operations in the vicinity of the WIPP facility, as required
14 by 20.4.1.300 NMAC (incorporating 40 CFR §§262.256 and 262.261(c)) and 20.4.1.500 NMAC
15 (incorporating 40 CFR §264.37 and §264.52(c)), include, but is not limited to, the following:

- 16 • Agreements with local mining companies, including Intrepid Potash NM LLC, White
17 Marble Mine, and Mosaic Potash Carlsbad Inc. provide for mutual aid and assistance, in
18 the form of MRTs, in the event of a mine disaster or other circumstance at either of the
19 facilities. This provision ensures that the WIPP MOC will have two MRTs available at all
20 times when miners are underground.
- 21 • An agreement with the U.S. Department of Interior (**DOI**), represented by the Bureau of
22 Land Management (**BLM**), Roswell District, for wildland firefighting support within the
23 WIPP Land Withdrawal Area.
- 24 • Agreements for mutual-aid firefighting with Eddy County, the City of Hobbs, and the City
25 of Carlsbad for assistance, including equipment and personnel.
- 26 • A mutual-aid Agreements with the City of Hobbs and the City of Carlsbad for mutual
27 ambulance, medical, rescue, and hazardous material response services; for use of
28 WIPP facility radio frequencies during emergencies; and for mutual security and law
29 enforcement services, within the appropriate jurisdiction limits of each party.
- 30 • Agreements with the Covenant Health Hobbs Hospital and the Carlsbad Medical Center
31 for the treatment of persons with radiological contamination who have incurred injuries
32 beyond the treatment capabilities at the WIPP site. The WIPP facility provides transport
33 of the patient(s) to these facilities.
- 34 • Agreements with the Sheriff of Eddy County and the Sheriff of Lea County for mutual law
35 enforcement services support.
- 36 • An agreement with the New Mexico Department of Homeland Security and Emergency
37 Management for mutual emergency management support, access to state law
38 enforcement, public works, and transportation assets.

1 D-8 Evacuation Plan

2 If it becomes necessary to evacuate all or part of the WIPP facility, on-site assembly and off-site
3 staging areas have been established. The off-site staging areas are outside the security fence.
4 The Permittees have plans and implementation procedures for both surface and underground
5 evacuations. Drills are performed on these procedures at the WIPP facility at least annually. The
6 following sections describe the evacuation plan for the WIPP facility, as required under
7 20.4.1.300 NMAC (incorporating 40 CFR §262.261(f)) and 20.4.1.500 NMAC (incorporating 40
8 CFR §264.52(f)).

9 D-8a Surface Evacuation On-site and Off-site Staging Areas

10 Figure D-6 shows the surface assembly and staging areas and the evacuation gates. Security
11 officers remain at the primary staging area gate 24 hours a day, and the vehicle trap is opened
12 for personnel during emergency evacuations. The north gate has a single-person gate and a
13 large gate which can be opened, similar to the main gates for the primary staging area.
14 Alternative evacuation route exit points are located at the east and south gates. The east and
15 south gates are turnstile gates. Upon notification, security personnel will respond, open gates,
16 and facilitate egress for evacuation.

17 If a building or area evacuation is necessary, the RCRA Emergency Coordinator, in conjunction
18 with the Incident Commander, will determine which assembly area is to be used and will
19 communicate the selection to facility personnel. The preferred evacuation route is determined
20 based on the nature of the event, prevailing weather conditions, and actual or potential
21 radiological release. If site evacuation is necessary, the RCRA Emergency Coordinator, in
22 conjunction with the Incident Commander, will decide which staging area is to be used and will
23 communicate the selection to facility personnel. The WIPP site evacuation routes are shown in
24 Figure D-8. The surface evacuation alarm and public address system are used to direct
25 personnel evacuation. Persons responsible for surface accountability will direct personnel to the
26 selected staging area outside the security fence.

27 Personnel report to the designated assembly or staging area where accountability is conducted
28 (Figure D-6). Personnel who are working in a contaminated area when site evacuation is
29 announced will assemble at specific staging areas for potentially contaminated personnel in
30 order to minimize contact with other personnel during the evacuation.

31 D-8b Underground Assembly Areas and Egress Hoist Stations

32 Depending upon the type of emergency and level of response, it may be necessary for
33 personnel in the underground to shelter in place, report to designated assembly areas (Figure
34 D-7), or to evacuate the underground. Underground personnel are trained to immediately report
35 to assembly areas under specific circumstances (i.e., loss of underground power or ventilation).
36 Underground accountability is taken when the underground is sheltered in place or evacuated.
37 The Underground Controller is responsible for underground personnel accountability. Each
38 assembly area contains a mine page phone, miner's aid station, and evacuation maps.

39 In accordance with 30 CFR §57.11050, the mine maintains two escapeways. These
40 escapeways are designated as Egress Hoist Stations. When the need for an underground
41 evacuation has been determined, underground personnel report to the Egress Hoist Stations.

1 Decontamination of underground personnel will be conducted the same way as described for
2 surface decontamination. Contaminated personnel are trained to remain segregated from other
3 personnel until radiological contamination control personnel can respond.

4 D-8c Plan for Surface Evacuation

5 Surface evacuation notification is initiated by the CMRO, as directed by the RCRA Emergency
6 Coordinator, via sound-ing of the surface evacuation alarm and providing incident information
7 via the public address system. The persons responsible for surface accountability assist
8 personnel in evacuation from their areas. Egress routes from buildings and site evacuation
9 routes and instructions are posted in designated areas throughout the site. Egress routes from
10 the WHB Unit are shown in Figures D-6a, D-6b, and D-6c.

11 D-8d Plan for Underground Evacuation

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

14 Personnel will evacuate to the nearest Egress Hoist Station. Primary underground escape
15 routes (identified by green reflectors on the rib) will be used, if possible. Secondary underground
16 escape routes (identified by red reflectors on the rib) will be used if necessary (Figure D-4).
17 Detailed descriptions of escapeways and an underground escape map are included in the
18 *Underground Escape and Evacuation Plan* on file at the WIPP facility, as required by MSHA, 30
19 CFR §57.11053, for underground mining situations. The MSHA required map takes precedence
20 over Figure D-4, *Underground Escape and Evacuation Map*, should an underground mine
21 related event occur necessitating a change to the evacuation routes. The Underground
22 Controller is responsible for underground personnel accountability and for reporting
23 accountability to the RCRA Emergency Coordinator.

24 Upon reaching the surface, personnel will report to their on-site surface assembly or off-site
25 staging area, as directed, to receive further instructions.

26 Members of the WIPP Fire Department and the MRT who may be underground, will assist in the
27 evacuation of the underground when an underground evacuation is called for. A reentry by the
28 MRT will be performed according to 30 CFR Part 49 and MSHA regulations for reentry into a
29 mine. The MRTs are trained in compliance with 30 CFR Part 49 in mine mapping, mine gases,
30 ventilation, exploration, mine fires, rescue, and recovery.

31 D-8e Further Site Evacuation

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

- 34 • Buses/vans—WIPP facility buses/vans will be available for evacuation of personnel. The
35 buses/vans are stationed in the employee parking lot.
- 36 • Privately Owned Vehicles—Because many employees drive to work in their own
37 vehicles, these vehicles may be used in an emergency. Personnel will be provided
38 routes to be taken when leaving the facility.

1 These vehicles may be used to transport personnel who have been released from the site by
2 the RCRA Emergency Coordinator.

3 The primary evacuation routes for the WIPP facility are the main DOE north/south access road,
4 which connects to U.S. Highways 62/180 (north) and State Highway 128 (south). Alternate
5 evacuation routes from the facility are provided at the south side and the east side of the facility.
6 Utilization of the alternate evacuation routes leads to either the main DOE north/south access
7 road or Campbell Road, which travels north and intersects with U.S. Highway 62/180. The
8 primary and alternate evacuation routes are depicted in Figures D-8 and D-8a.

9 D-9 Location of the RCRA Contingency Plan and Plan Revision

10 In accordance with 20.4.1.300 NMAC (incorporating 40 CFR §§262 and 262.262(a)) and
11 20.4.1.500 NMAC (incorporating 40 CFR §264.53(a)), the owner/operator of the WIPP facility
12 will ensure that copies of this *RCRA Contingency Plan* are maintained at the WIPP facility and
13 are available to the emergency personnel and organizations described in Section D-2. When the
14 *RCRA Contingency Plan* is revised, updated copies are distributed (electronically or via site
15 mail) or hand delivered to applicable WIPP facility emergency personnel and Emergency
16 Operations Centers. In addition, the Permittees will make copies available to the following
17 federal, state, and local agencies and mining companies in the vicinity of the WIPP facility, as
18 required by 20.4.1.300 (incorporating 40 CFR §262.262(a)) and 20.4.1.500 NMAC
19 (incorporating 40 CFR §264.53(b)):

- 20 • Intrepid Potash New Mexico LLC
- 21 • White Marble Mine
- 22 • Mosaic Potash Carlsbad Inc.
- 23 • City of Carlsbad
- 24 • Carlsbad Medical Center, Carlsbad
- 25 • Covenant Health Hobbs Hospital, Hobbs
- 26 • City of Hobbs
- 27 • BLM, Carlsbad
- 28 • New Mexico State Police
- 29 • New Mexico Department of Homeland Security and Emergency Management
- 30 • Eddy County Commission
- 31 • Sheriff of Eddy County
- 32 • Sheriff of Lea County
- 33 • Eddy County Fire and Rescue
- 34 • Eddy County Emergency Management
- 35 • Lea County Emergency Management

36 In accordance with 20.4.1.300 NMAC (incorporating 40 CFR §262.263) and 20.4.1.500 NMAC
37 (incorporating 40 CFR §264.54), the Permittees will ensure that this plan is reviewed and
38 amended whenever:

- 39 • The Permit for the WIPP facility is revised in any way that would affect the *RCRA*
40 *Contingency Plan*;
- 41 • This plan fails in an emergency;

- 1 • The WIPP facility design, construction, operation, maintenance, or other circumstances
- 2 change in a way that materially increases the potential for fires, explosions, or releases
- 3 of hazardous waste or hazardous constituents or change the response necessary in an
- 4 emergency;

- 5 • The list of RCRA Emergency Coordinators change; or

- 6 • The list of WIPP facility emergency equipment changes.

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TABLES

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**Table D-1
 Resource Conservation and Recovery Act Emergency Coordinators¹**

Name	Address*	Office Phone	Personal Phone*	24-Hour Emergency Phone
J.E. (Joseph) Bealler		(575) 234-8276 or (575) 234-8916		(575) 234-8111
M.G. (Mike) Proctor		(575) 234-8276 or (575) 234-8143		(575) 234-8111
P.J. (Paul) Paneral		(575) 234-8498		(575) 234-8111
A.C. (Andy) Cooper		(575) 234-8197		(575) 234-8111
C.J. (Chris) Belis		(575) 628-5851		(575) 234-8111
B.R. (Bobby) Franco		(575) 234-8163		(575) 234-8111
G.W. (Gregory) Brown		(575) 234-5862		(575) 234-8111
R.D. (Ryan) Parrish		(575) 234-8638		(575) 234-8111
R.E. (Eric) Chavez		(575) 234-5831		(575) 234-8111
D.L. (Donald) Jurney		(575) 234-8216		(575) 234-8111
R.H. (Robert) Valenzuela		(575) 234-8799		(575) 234-8111
J.R. (James) Bailey		(575) 234-8276		(575) 234-8111
M.L. (Martin) Mendes		(575) 234-5822		(575) 234-8111
D.J. (Derek) Tweedy		(575) 234-8272		(575) 234-8111

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

¹ For every shift, one qualified RCRA Emergency Coordinator serves as the primary, and a second qualified RCRA Emergency Coordinator is available to serve as the alternate.

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**Table D-2
 Emergency Equipment Maintained at the Waste Isolation Pilot Plant**

Equipment	Description and Capabilities	Location
Communications		
Building Fire Alarms	Fire alarm panels, fire alarm transmitter, audible alarm devices (e.g., horns, bells, tones) that provide notification of fires; transmitted to the CMR	Guard and Security Building (Building 458), Water Pumphouse (Building 456), Warehouse/Shops Building (Building 453), Exhaust Shaft Filter Building (Building 413), New Filter Building (NFB) (Building 416), Salt Reduction Building (SRB) (Building 417), Support Building (Building 451), CMR/Computer Room, Waste Handling Building (Building 411), TRUPACT Maintenance Building (Building 412), Salt Handling (SH) Shaft Hoisthouse (Building 384), Auxiliary Warehouse Building (Building 455), Engineering Building (Building 486), Training Building (Building 489), Safety and Emergency Services Facility (Building 452), and CAAs (Buildings 474A and 474B)
Underground Fire Alarms	Fire alarm panels, fire alarm transmitter, and audible/visual alarm devices (e.g., horns, bells, strobes) that provide notification of fires; transmitted to the CMR	Fire detection and control panel locations: Waste Shaft Underground Station, SH Shaft Underground Station, Between E-140 and E-300 in S-2180 Drift, Fuel Station (N150/W170)
Site Notification System; Underground Evacuation Alarm System	For surface, alarms and notifications transmitted over paging channel of the public address system, manually initiated; for underground, audible alarm	Site-wide
Public Address System	Includes intercom phones; handset stations and loudspeaker assemblies	Site-wide

Equipment	Description and Capabilities	Location
Mine Pager Phones	Battery-operated paging system	Underground at S550/W30, S1000/W30, S1950/E140, SH Shaft Collar and Underground Station Waste Shaft Collar and Underground Station; – surface at Support Building (Building 451, FSM desk, CMR, lamproom), Safety and Emergency Services Facility (Building 452, Fire Department workstation area, Mine Rescue Room)
Portable Radios	Two-way, portable; transmits and monitors information to/from other transmitters	Issued to individuals
Plant Base Radios	Two-way, stationary; transmits and monitors information to/from other transmitters	Safety and Emergency Services Facility (Building 452), Guard and Security Building (Building 458), Support Building (Building 451, CMR, FSM desk)
Mobile Phones	Provide communications link between emergency response personnel, as needed	Issued to individuals plus emergency vehicles
Spill Response Equipment and Materials		
HAZMAT Equipment	Spill response equipment and supplies, PPE, and decontamination supplies stored and maintained in accordance with NFPA 1901 and as documented in WIPP facility files	Surface, in designated areas near Safety and Emergency Services Facility (Building 452)
Absorbent Materials	Containment or cleanup of spills, including: Pressurized spill-response gun; Absorbent sheets and/or dikes for containment or cleanup of spills of oil, petroleum-based chemicals, and general liquids; Spill-control material for solvents and neutralizing absorbents and for acids/caustics	Surface, in designated areas near Safety and Emergency Services Facility (Building 452)
Medical Resources		
Ambulance	A minimum of one ambulance, maintained and equipped in accordance with the New Mexico Ambulance Standard, 18.3.14 NMAC, and as documented in WIPP facility files	Surface at Safety and Emergency Services Facility (Building 452, Vehicle Bay)
Medical Cart	A minimum of one medical cart, equipped to provide basic life support operations, as documented in WIPP facility files	Underground (Emergency Vehicle Parking/Charging Area at S700/E140)
Miners First Aid Stations	Equipped per 30 CFR 57.15001	Underground (Salt Shaft Area, Waste Shaft Area, E300 Maintenance Shop, and at S1000/W30, S1300/W30, and S1950/E140)

Equipment	Description and Capabilities	Location
Fire Detection and Fire Suppression Equipment		
Building Smoke, Thermal Detectors, or Manual Pull Stations	Devices that trigger an alarm and/or fire suppression system	Guard and Security Building (Building 458), Warehouse/Shops Building (Building 453), Support Building (Building 451, CMR/Computer Room), Waste Handling Building (Building 411), TRUPACT Maintenance Building (Building 412), Underground Fuel Station (N150/W170), SH Shaft Hoisthouse (Building 384), Engineering Building (Building 486), Safety and Emergency Services Facility (Building 452), and Training Building (Building 489)
Fire Trucks	A minimum of two fire trucks with rescue equipment to assist in fighting fires and emergency rescue; firefighter equipped in accordance with NFPA 1901 and/or 1906 and as documented in WIPP facility files	Surface at Safety and Emergency Services Facility (Building 452, Vehicle Bay)
Rescue Cart	A minimum of one light rescue unit, equipped in accordance with the NFPA 1901 and as documented in WIPP facility files	Underground (Emergency Vehicle Parking/Charging Area at S700/E140)
Fire Suppression Cart	A minimum of one special-purpose electric cart to assist in fighting fires; equipped with a minimum of one fire extinguisher	Underground (Emergency Vehicle Parking/Charging Area at S700/E140)
Fire Extinguishers	Hand-held fire extinguishers; located throughout the facility in accordance with NFPA-10	Surface and underground locations used for hazardous waste management, as documented in WIPP facility files
Automatic Dry Chemical Extinguishing Systems	Automatic; actuated by thermal detectors or by manual pull stations	Underground fuel station (N150/W170)
Automatic Fire Suppression Systems on liquid fueled vehicles	Individual automatic fire suppression systems installed on applicable liquid-fueled vehicles, as determined by a fire risk assessment performed in accordance with NFPA 122	Surface and underground locations used for hazardous waste management, as documented in WIPP facility files

Equipment	Description and Capabilities	Location
Sprinkler Systems	NFPA water-based fire suppression systems	Water Pumphouse (Building 456), Guard and Security Building (Building 458), Waste Handling Building (Building 411, CH Bay, RH Bay, and Overpack Repair Areas only), TRUPACT Maintenance Building (Building 412), Exhaust Shaft Filter Building (Building 413), NFB (Building 416), SRB (Building 417), and CAAs (Buildings 474A and 474B)
Water Tanks, Hydrants	Fire suppression water supply; one 180,000-gallon capacity tank, plus a second tank with 100,000-gallon reserve	Tanks are at southwestern edge of WIPP facility; pipelines and hydrants are throughout the surface
Fire Water Pumps	Fire suppression water supply; pumps are minimally 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 jockey pump	Water Pumphouse (Building 456)
Personal Protection Equipment		
Head Lamps	Mounted on hard hat; battery operated	Each person underground
Underground Self-Rescuer Units	Short-term self-rescue devices per 30 CFR 57.15030	Each person underground
Self-Contained Self-Rescuer	Air supply; a minimum of 12 caches in the underground; self-contained rescue units shall be adequate to protect an individual for one hour or longer or, alternatively, sufficient to allow the employee time to reach an additional self-contained self-rescue device in the underground per NMSA 69-8-16	Cached throughout the underground
Mine Rescue Self-Contained Breathing Apparatus (SCBA)	Oxygen supply; 4-hour closed circuit units consistent with 30 CFR 49.6; a minimum of 12 units, one for each Mine Rescue Team member	Safety and Emergency Services Facility (Building 452, Mine Rescue Training Room)
Fire Department Self-Contained Breathing Apparatus (SCBA)	Air supply; a minimum of 12 units; SCBAs shall meet the minimum requirements established per NFPA 1981	Surface Fire Trucks and Rescue Truck; Underground Rescue Cart
General Plant Emergency Equipment		
Emergency Lighting	For employee 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	Waste Handling Building (Building 411); TRUPACT Maintenance Building (Building 412), Exhaust Shaft Filter Building (Building 413) NFB (Building 416), and SRB (Building 417)
Backup Power Sources	A minimum of two diesel generators, and battery-powered uninterruptible power supply (UPS)	Generators are located on the surface. UPS is located at the essential loads

Equipment	Description and Capabilities	Location
Emergency Hoist	Hoist in Air Intake Shaft	Air Intake Shaft (Building 361)
Emergency Showers	For emergency flushing of chemical contact or injury	Waste Handling Building (Building 411) is served by the decontamination shower trailer located north of Building 411, in front of Building 952, between Buildings 243 and 455; and CAAs (Building 474A)
Emergency Eyewash Equipment	For emergency flushing of affected eyes	Waste Handling Building (Building 411, RH Bay, Site Derived Waste Area, Waste Shaft Collar, and Room 108 TRUPACT III only), TRUPACT Maintenance Building (Building 412), Exhaust Shaft Filter Building (Building 413), NFB (Building 416), SRB (Building 417), CAAs and SAAs
Overpack containers for TRU Mixed Waste	85 Gallon drums SWBs TDOP	Warehouse Annex (Building 481)
Aquaset or Cement	Material for solidification of liquid waste generated as a result of fire fighting water or decontamination solutions	Surface Connex A, located south of Waste Handling Building (Building 411)
TDOP Upender	Upender facilitates overpacking standard waste boxes	Waste Handling Building (Building 411)
Non hazardous Decontaminating Agents	For decontamination of surfaces, equipment, and personnel	Waste Handling Building (Building 411); Surface Connex A, located south of Building 411

FIGURES

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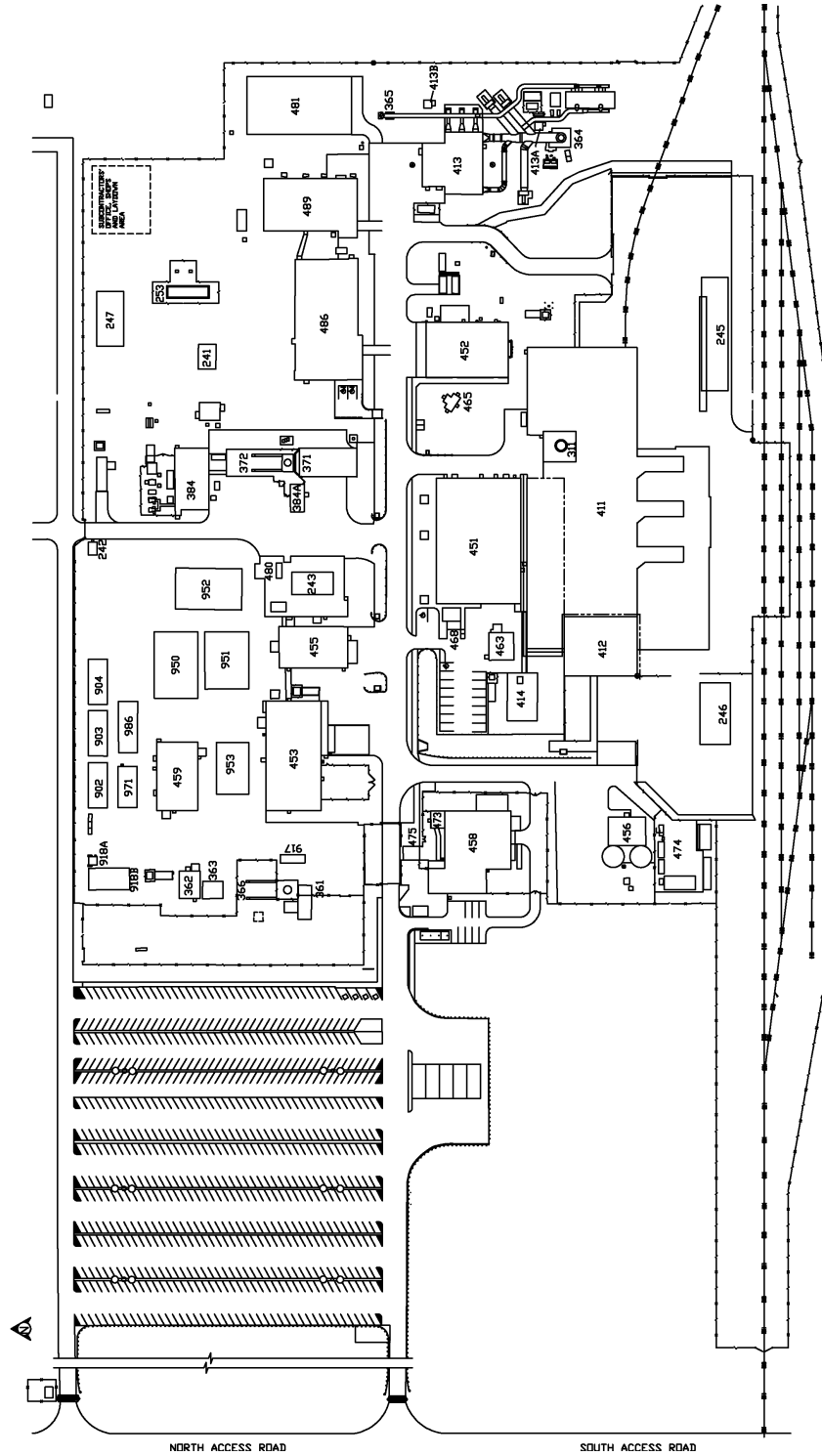


Figure D-1
WIPP Surface Structures

BLDG./ FAC. #	DESCRIPTION	BLDG./ FAC. #	DESCRIPTION	BLDG./ FAC. #	DESCRIPTION
#241	EQUIPMENT SHED	#384	SALT HANDLING SHAFT HOISTHOUSE	#475	GATEHOUSE
#242	GUARDSHACK	#384A	MINING OPERATIONS	#480	VEHICLE FUEL STATION
#243	SALT HAULING TRUCKS SHELTER	#411	WASTE HANDLING BUILDING	#481	WAREHOUSE ANNEX
#245	TRUPACT TRAILER SHELTER	#412	TRUPACT MAINTENANCE BUILDING	#486	ENGINEERING BUILDING
#246	MgO STORAGE SHELTER	#413	EXHAUST SHAFT FILTER BUILDING	#489	TRAINING BUILDING
#253	13.8 KV SWITCHGEAR 25P-SWG15/1	#413A	MONITORING STATION A	#H-16	SANDIA TEST WELL
#254.1	AREA SUBSTATION NO.1 25P-SW15. 1	#413B	MONITORING STATION B	#917	AIS MONITORING
#254.2	AREA SUBSTATION NO.2 25P-SW15.2	#414	WATER CHILLER FACILITY & BLDG	#918A	VOC AIR MONITORING STATION
#254.3	AREA SUBSTATION NO.3 25P-SW15.3	#451	SUPPORT BUILDING	#918B	VOC LAB TRAILER
#254.4	AREA SUBSTATION NO.4 25P-SW15.4	#452	SAFETY & EMERGENCY SERVICES FACILITY	#950	WORK CONTROL TRAILER
#254.5	AREA SUBSTATION NO.5 25P-SW15.5	#453	WAREHOUSE/SHOPS BUILDING	#951	PROCUREMENT/PURCHASING
#254.6	AREA SUBSTATION NO.6 25P-SW15.6	#455	AUXILIARY WAREHOUSE BUILDING	#952	TRAILER
#254.7	AREA SUBSTATION NO.7 25P-SW15.7	#456	WATER PUMPHOUSE	#953	MODULAR OFFICE COMPLEX
#254.8	AREA SUBSTATION NO.8 25P-SW15.8	#457N	WATER TANK 25-D-001B	#971	HUMAN RESOURCES TRAILER
#254.9	480V SWITCHGEAR (25P-SWG04/9)	#457S	WATER TANK 25-D-001A	#986	PUBLICATIONS & PROCEDURES TRAILER
#255.1	BACK-UP DIESEL GENERATOR #1 25-PE 503	#458	GUARD AND SECURITY BUILDING	SWR NO.6	SWITCHRACK NO. 6
#255.2	BACK-UP DIESEL GENERATOR #2 25-PE 504	#459	CORE STORAGE BUILDING	SWR NO.7,7A,7B	SWITCHRACK NO. 7, 7A, 7B
#256.4	SWITCHBOARD #4 (25P-SBD04/4)	#463	COMPRESSOR BUILDING	SWR NO.7C	SWITCHRACK NO. 7C
#311	WASTE SHAFT	#465	AUXILIARY AIR INTAKE	SWR NO.10	SWITCH RACK NO. 10
#351	EXHAUST SHAFT	#468	TELEPHONE HUT	SWR NO.11	SWITCH RACK NO. 11
#361	AIR INTAKE SHAFT	#473	ARMORY BUILDING	SWR NO.12	SWITCH RACK NO. 12
#362	AIR INTAKE SHAFT/HOIST HOUSE	#474	HAZARDOUS WASTE STORAGE FACILITY	SWR NO.15	SWITCH RACK NO. 15
#363	AIR INTAKE SHAFT/WINCH HOUSE	#474A	HAZARDOUS WASTE STORAGE BUILDING		
#364	EFFLUENT MONITORING INSTRUMENT SHED A	#474B	HAZARDOUS WASTE STORAGE BUILDING		
#365	EFFLUENT MONITORING INSTRUMENT SHED B	#474C	OIL & GREASE STORAGE BUILDING		
#366	AIR INTAKE SHAFT HEADFRAME	#474D	GAS BODLE STORAGE BUILDING		
#371	SALT HANDLING SHAFT	#474E	HAZARD MATERIAL STORAGE BUILDING		
#372	SALT HANDLING SHAFT HEADFRAME	#474F	WASTE OIL RETAINER		

Figure D-1a
Legend to Figure D-1

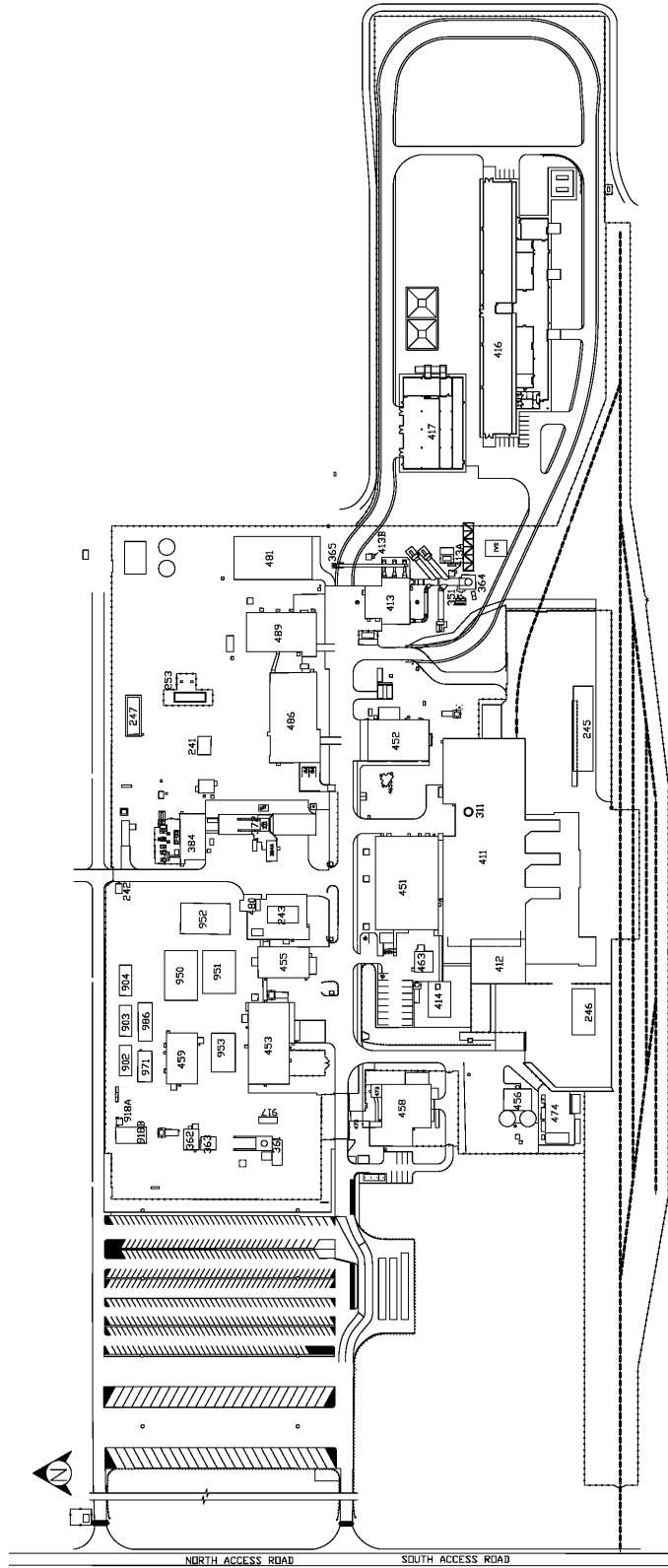


Figure D-1-NFB
WIPP Surface Structures with Building 416

Waste Isolation Pilot Plant
 Hazardous Waste Permit
 August 2020/October 2021

BLDG./ FAC. #	DESCRIPTION	BLDG./ FAC. #	DESCRIPTION	BLDG./ FAC. #	DESCRIPTION
#241	EQUIPMENT SHED	#384A	MINING OPERATIONS	#475	GATEHOUSE
#242	GUARDSHACK	#411	WASTE HANDLING BUILDING	#480	VEHICLE FUEL STATION
#243	SALT HAULING TRUCKS SHELTER	#412	TRUPACT MAINTENANCE BUILDING	#481	WAREHOUSE ANNEX
#245	TRUPACT TRAILER SHELTER	#413	EXHAUST SHAFT FILTER BUILDING	#486	ENGINEERING BUILDING
#246	MgO STORAGE SHELTER	#413A	MONITORING STATION A	#489	TRAINING BUILDING
#253	13.8 KV SWITCHGEAR 25P-SWG15/1	#413B	MONITORING STATION B	#H-16	SANDIA TEST WELL
#254.1	AREA SUBSTATION NO.1 25P-SW15. 1	#414	WATER CHILLER FACILITY & BLDG	#902	TRAILER
#254.2	AREA SUBSTATION NO.2 25P-SW15.2	#416	NEW FILTER BUILDING	#903	TRAILER
#254.3	AREA SUBSTATION NO.3 25P-SW15.3	#417	SALT REDUCTION BUILDING	#904	TRAILER
#254.4	AREA SUBSTATION NO.4 25P-SW15.4	#451	SUPPORT BUILDING	#917	AIS MONITORING
#254.5	AREA SUBSTATION NO.5 25P-SW15.5	#452	SAFETY & EMERGENCY SERVICES FACILITY	#918A	VOC AIR MONITORING STATION
#254.6	AREA SUBSTATION NO.6 25P-SW15.6	#453	WAREHOUSE/SHOPS BUILDING	#918B	VOC LAB TRAILER
#254.7	AREA SUBSTATION NO.7 25P-SW15.7	#455	AUXILLIARY WAREHOUSE BUILDING	#950	WORK CONTROL TRAILER
#254.8	AREA SUBSTATION NO.8 25P-SW15.8	#456	WATER PUMPHOUSE	#951	PROCUREMENT/PURCHASING
#254.9	480V SWITCHGEAR (25P-SWG04/9)	#457N	WATER TANK 25-D-001B	#952	TRAILER
#255.1	BACK-UP DIESEL GENERATOR #1 25-PE 503	#457S	WATER TANK 25-D-001A	#953	MODULAR OFFICE COMPLEX
#255.2	BACK-UP DIESEL GENERATOR #2 25-PE 504	#458	GUARD AND SECURITY BUILDING	#971	HUMAN RESOURCES TRAILER
#256.4	SWITCHBOARD #4 (25P-SBD04/4)	#459	CORE STORAGE BUILDING	#986	PUBLICATIONS & PROCEDURES TRAILER
#311	WASTE SHAFT	#463	COMPRESSOR BUILDING	SWR NO.6	SWITCHRACK NO. 6
#351	EXHAUST SHAFT	#465	AUXILIARY AIR INTAKE	SWR NO.7,7A,7B	SWITCHRACK NO. 7, 7A, 7B
#361	AIR INTAKE SHAFT	#468	TELEPHONE HUT	SWR NO.7C	SWITCHRACK NO. 7C
#362	AIR INTAKE SHAFT/HOIST HOUSE	#473	ARMORY BUILDING	SWR NO.10	SWITCH RACK NO. 10
#363	AIR INTAKE SHAFT/WINCH HOUSE	#474	HAZARDOUS WASTE STORAGE FACILITY	SWR NO.11	SWITCH RACK NO. 11
#364	EFFLUENT MONITORING INSTRUMENT SHED A	#474A	HAZARDOUS WASTE STORAGE BUILDING	SWR NO.12	SWITCH RACK NO. 12
#365	EFFLUENT MONITORING INSTRUMENT SHED B	#474B	HAZARDOUS WASTE STORAGE BUILDING	SWR NO.15	SWITCH RACK NO. 15
#366	AIR INTAKE SHAFT HEADFRAME	#474C	OIL & GREASE STORAGE BUILDING		
#371	SALT HANDLING SHAFT	#474D	GAS BODLE STORAGE BUILDING		
#372	SALT HANDLING SHAFT HEADFRAME	#474E	HAZARD MATERIAL STORAGE BUILDING		
#384	SALT HANDLING SHAFT HOISTHOUSE	#474F	WASTE OIL RETAINER		

**Figure D-1a-NFB,
 Legend to Figure D-1-NFB (Building 416)**

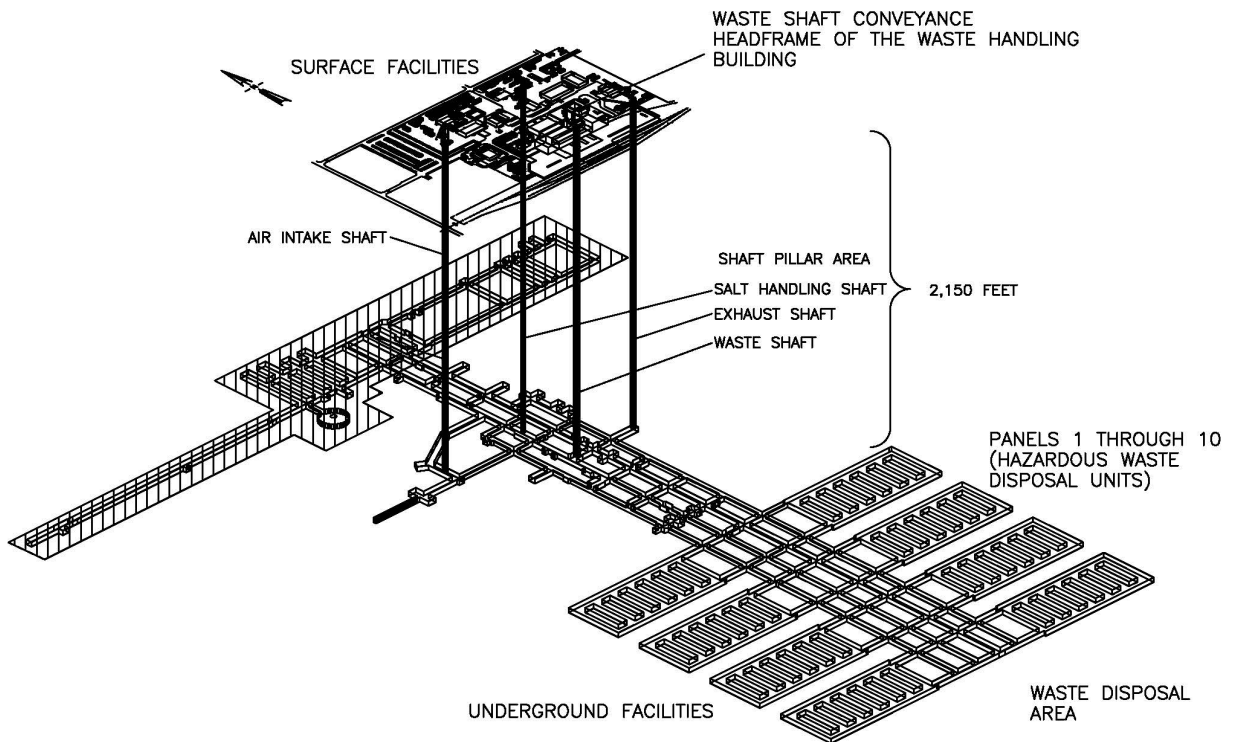


Figure D-2
Spatial View of the WIPP Facility

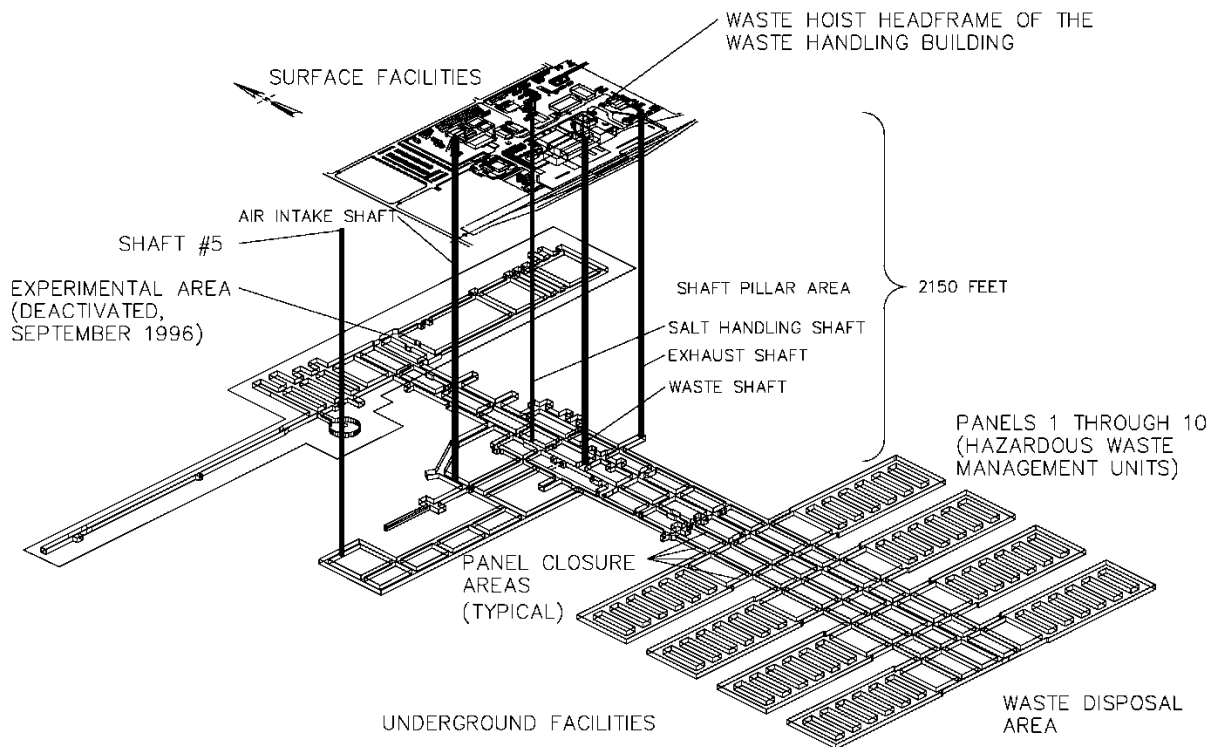
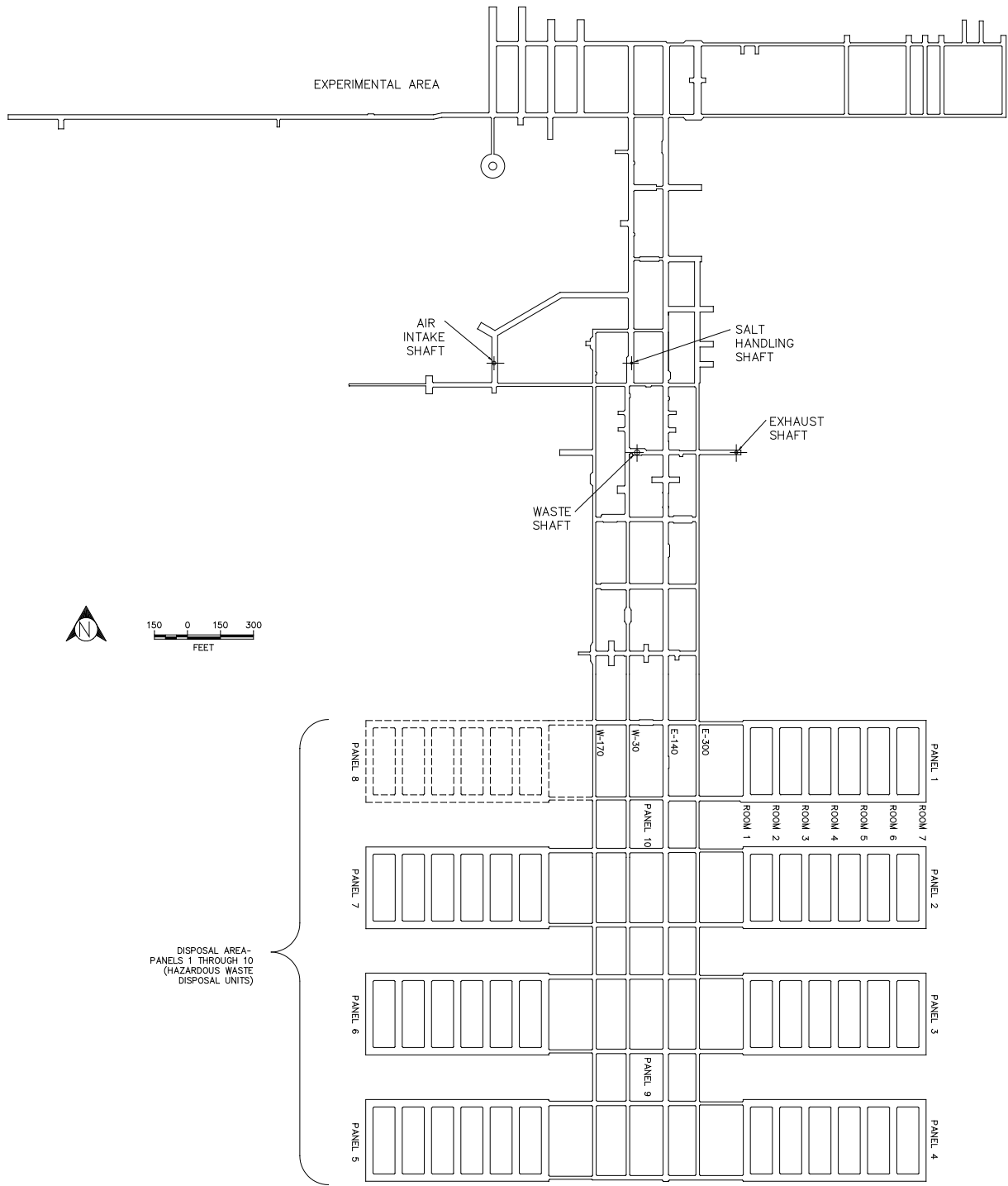


Figure D-2-S#5
Spatial View of the WIPP Facility (with S#5)



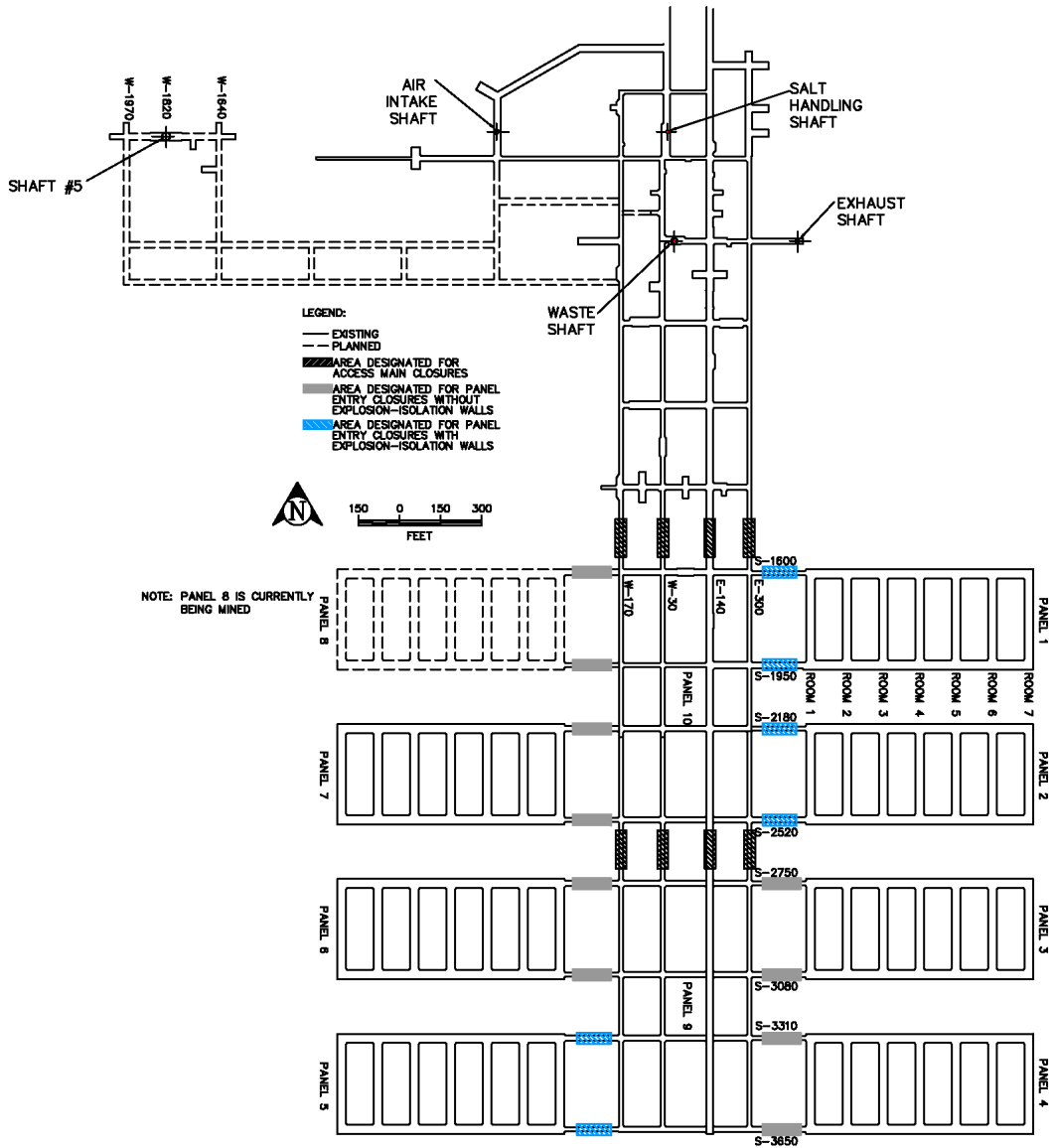


Figure D-3
WIPP Underground Facilities

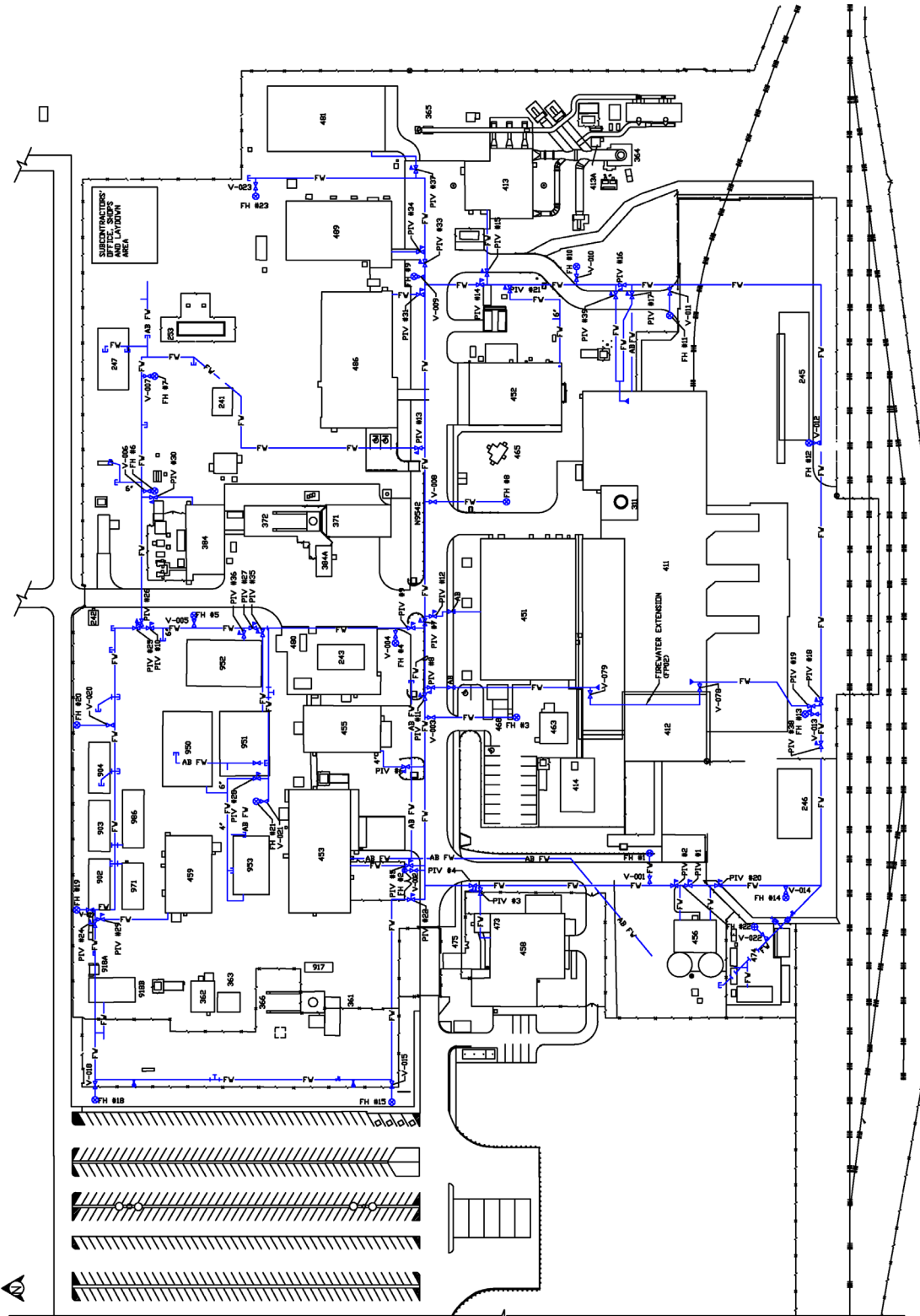
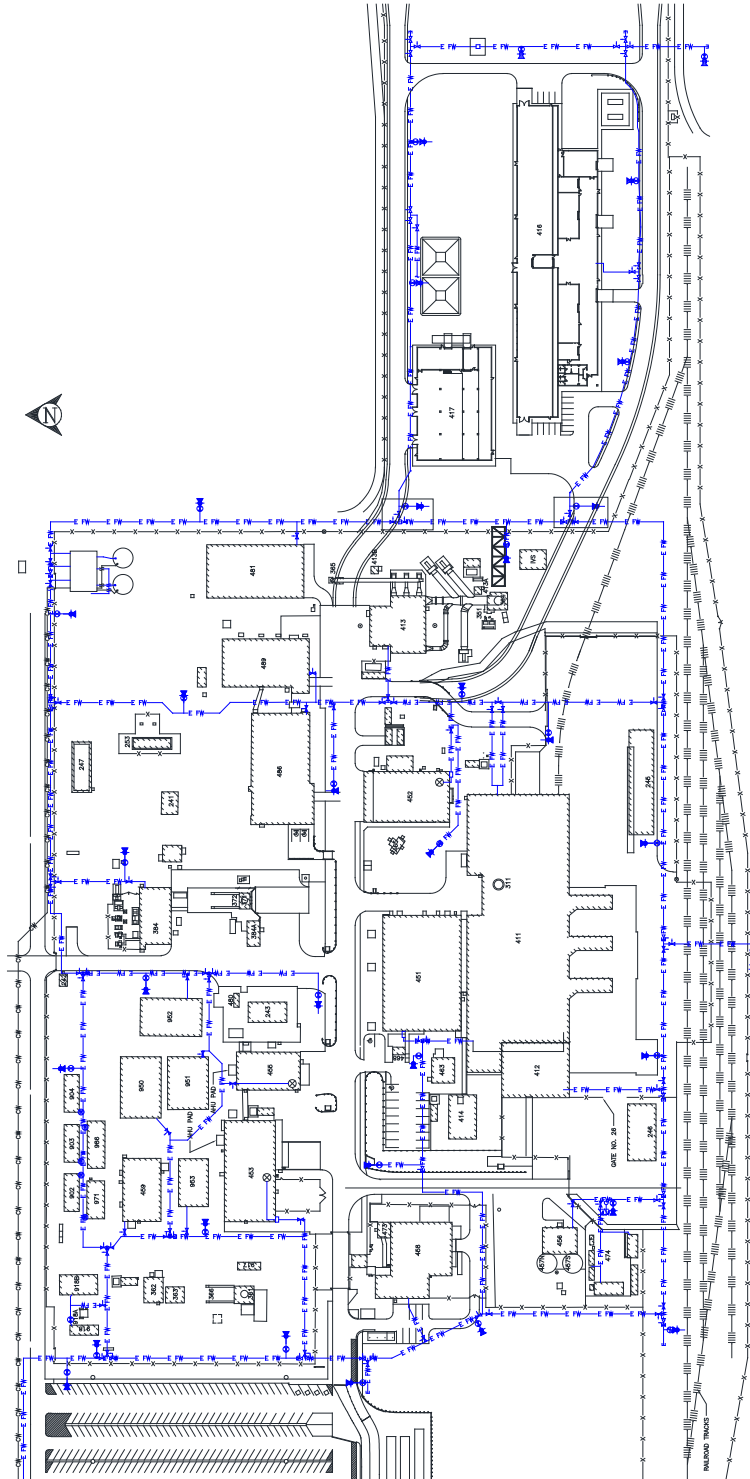


Figure D-5
Fire-Water Distribution System



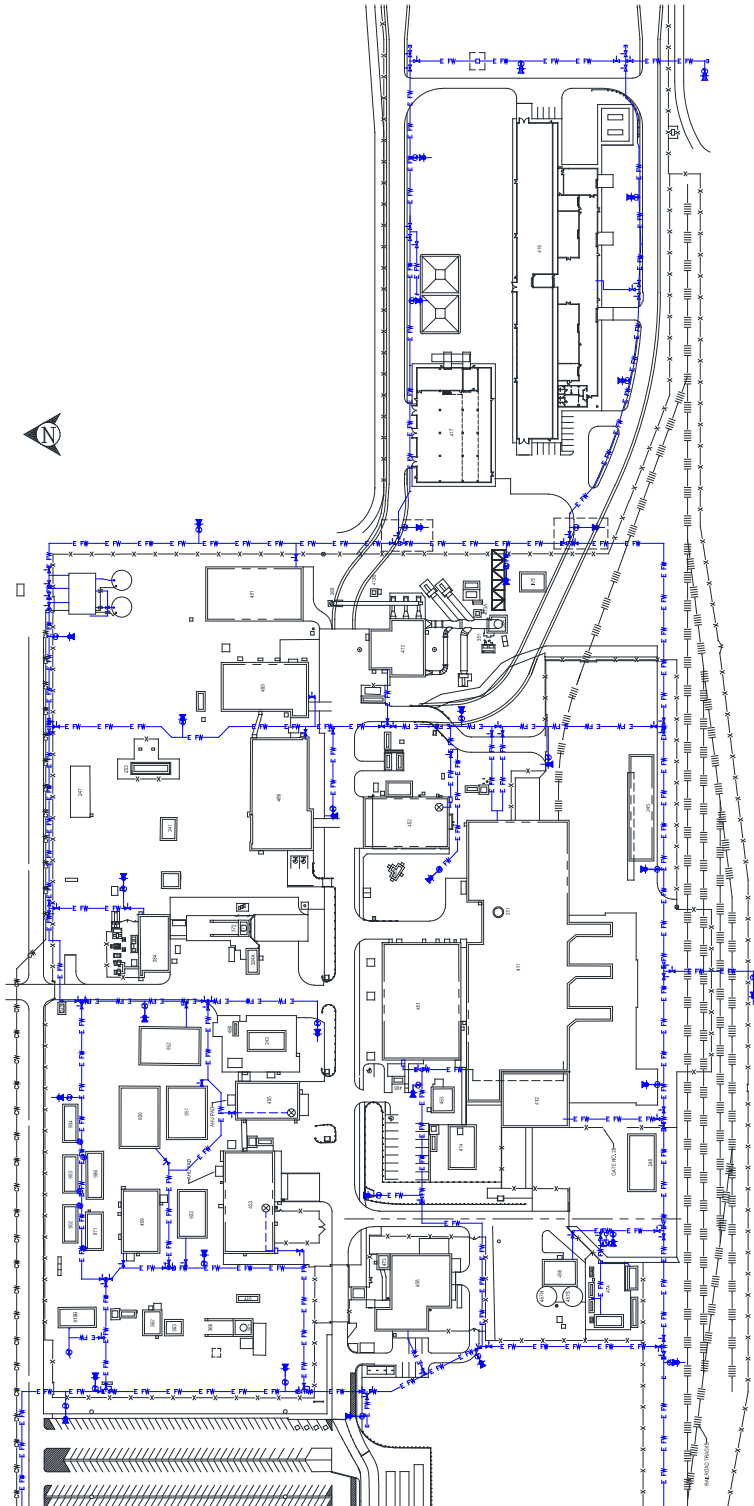


Figure D-5-NFB
Fire-Water Distribution System with Building 416

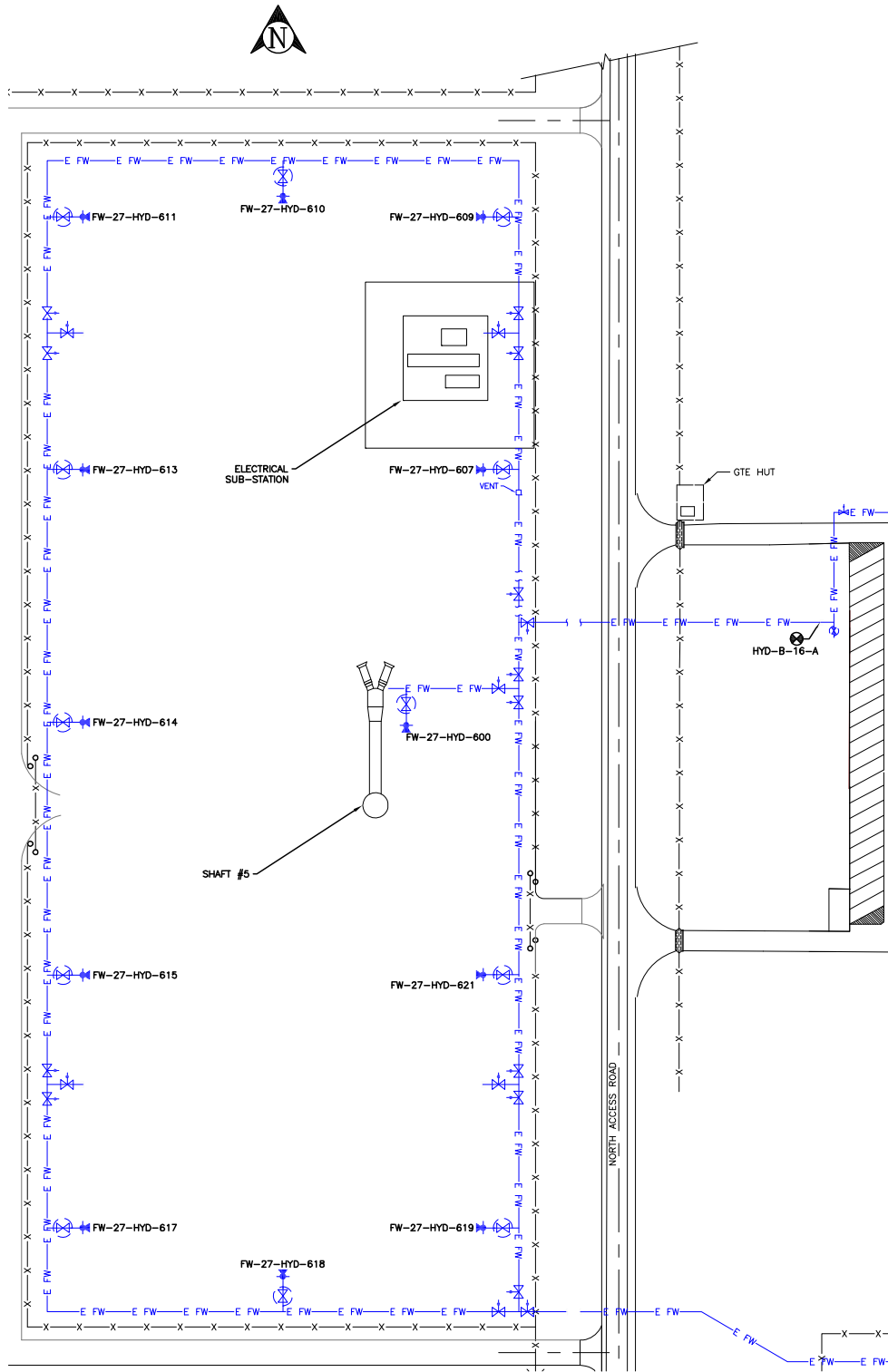


Figure D-5-S#5
Fire-Water Distribution System (with S#5)

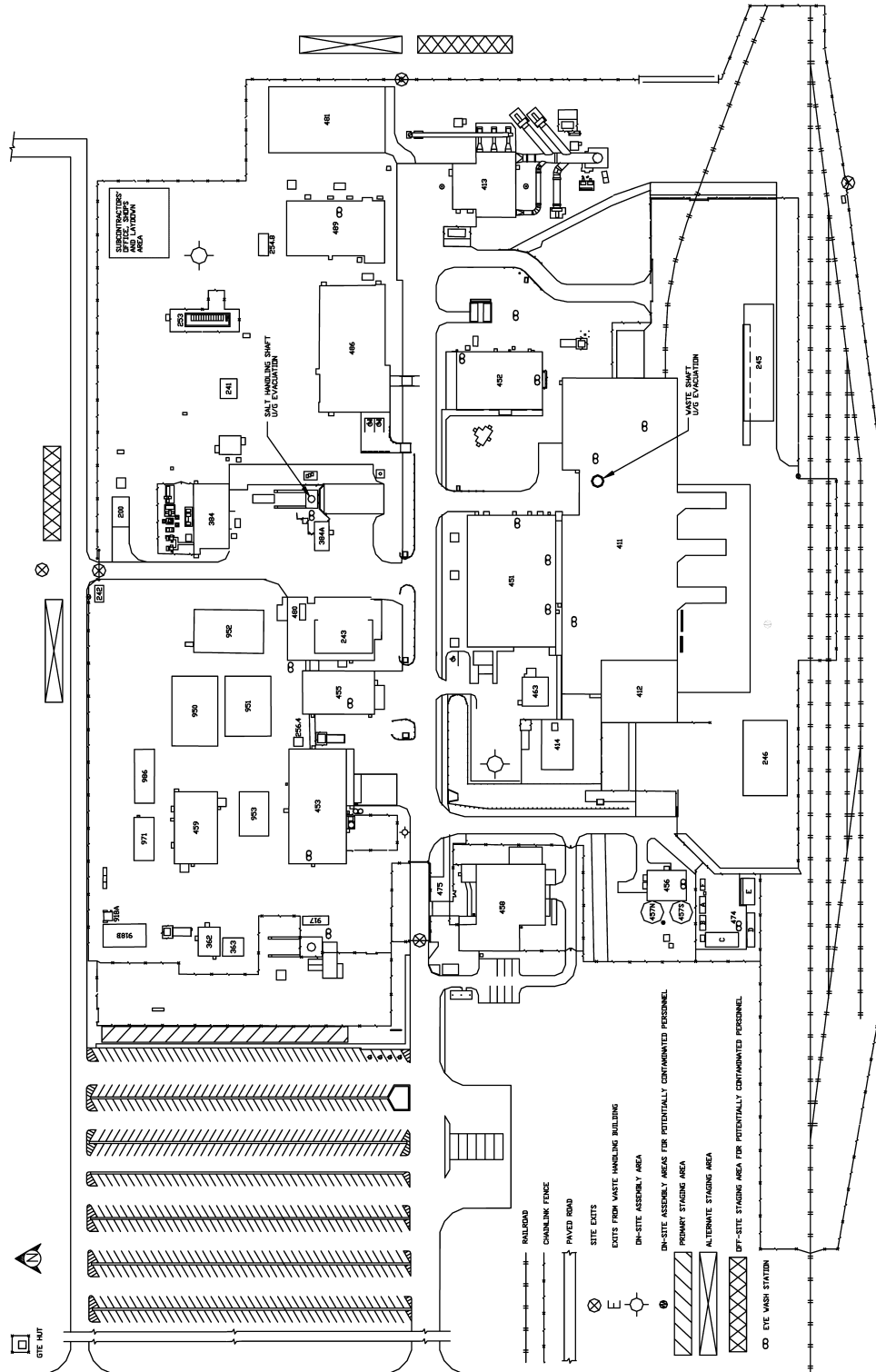


Figure D-6
WIPP On-Site Assembly Areas and Off-Site Staging Areas

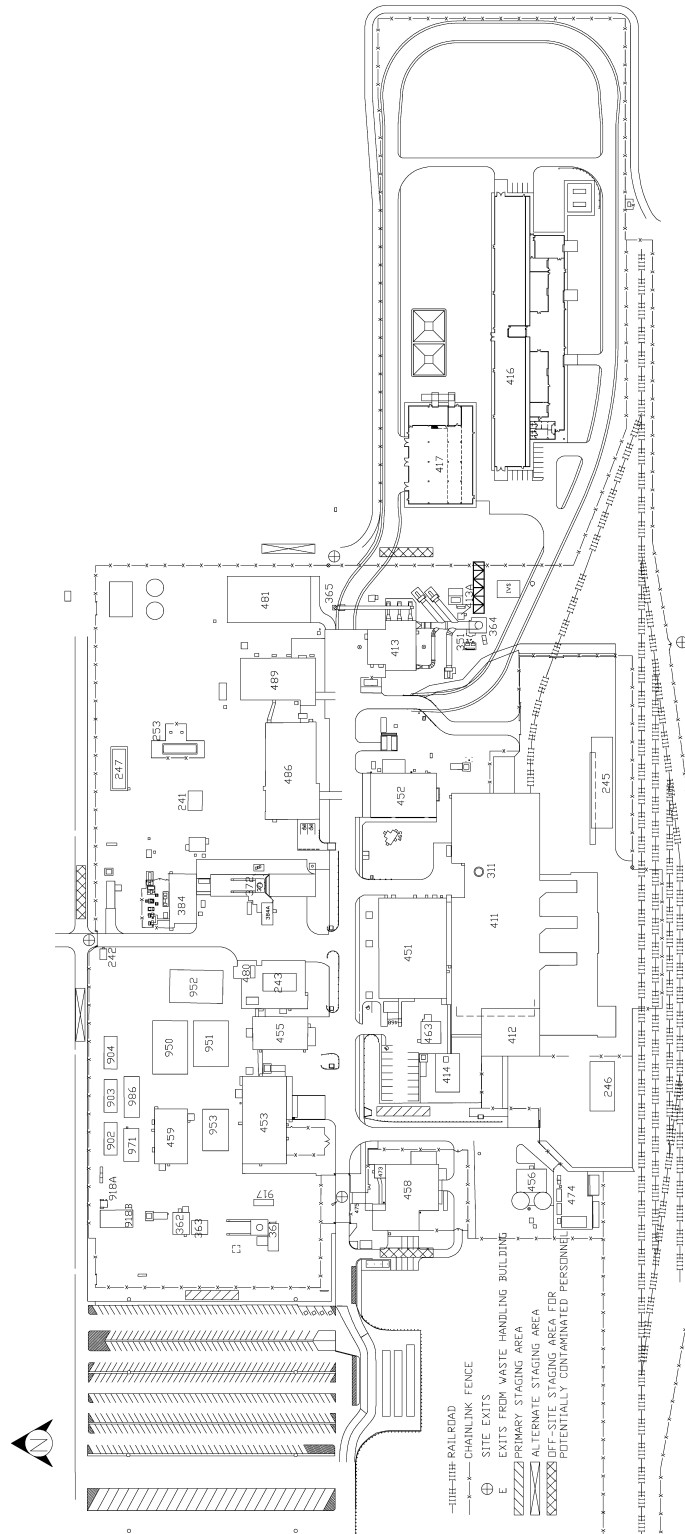
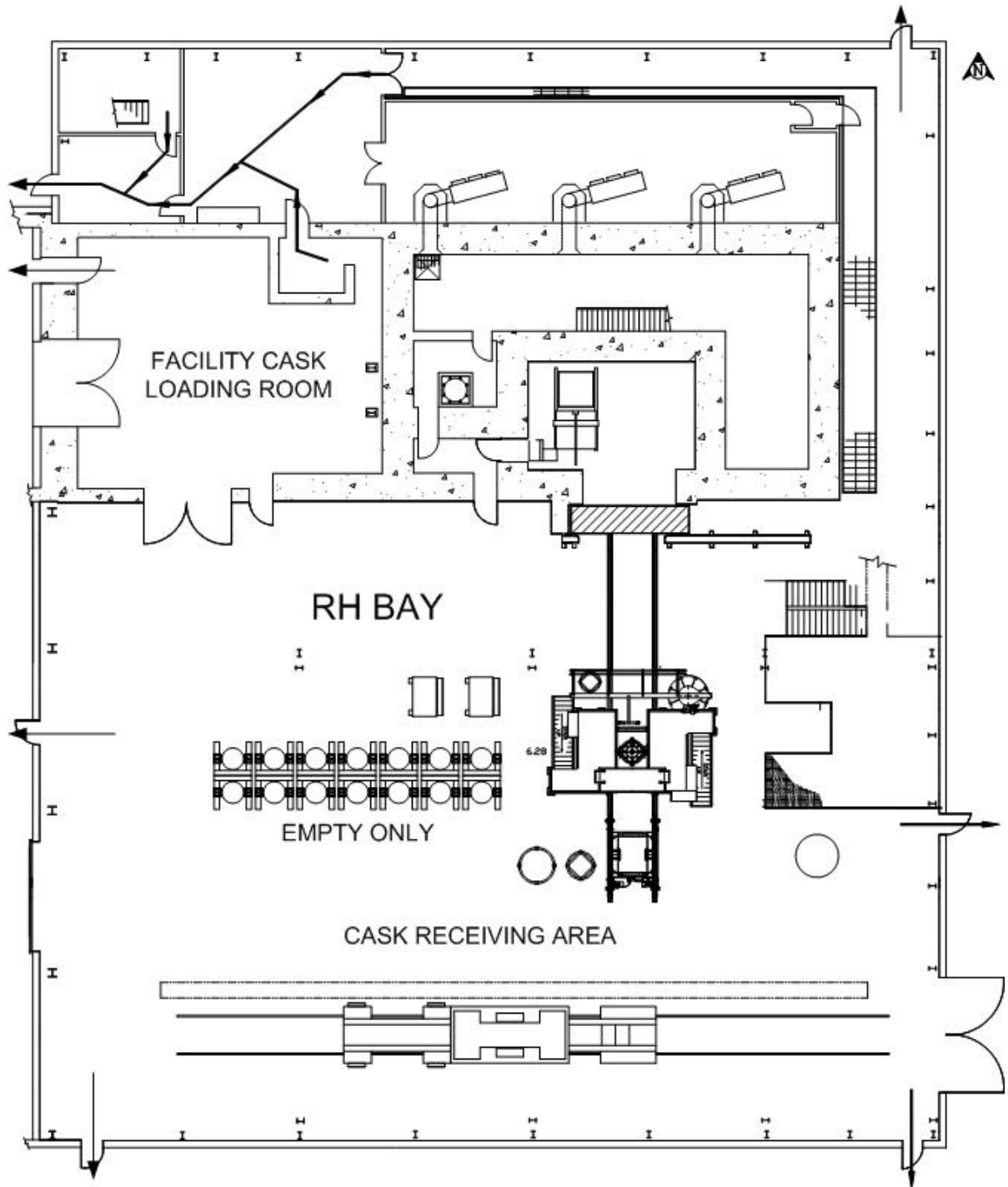


Figure D-6-NFB
WIPP On-Site Assembly Areas and Off-Site Staging Areas with Building 416



This illustration for
Information Purposes Only.

Figure D-6a
RH Bay Evacuation Routes

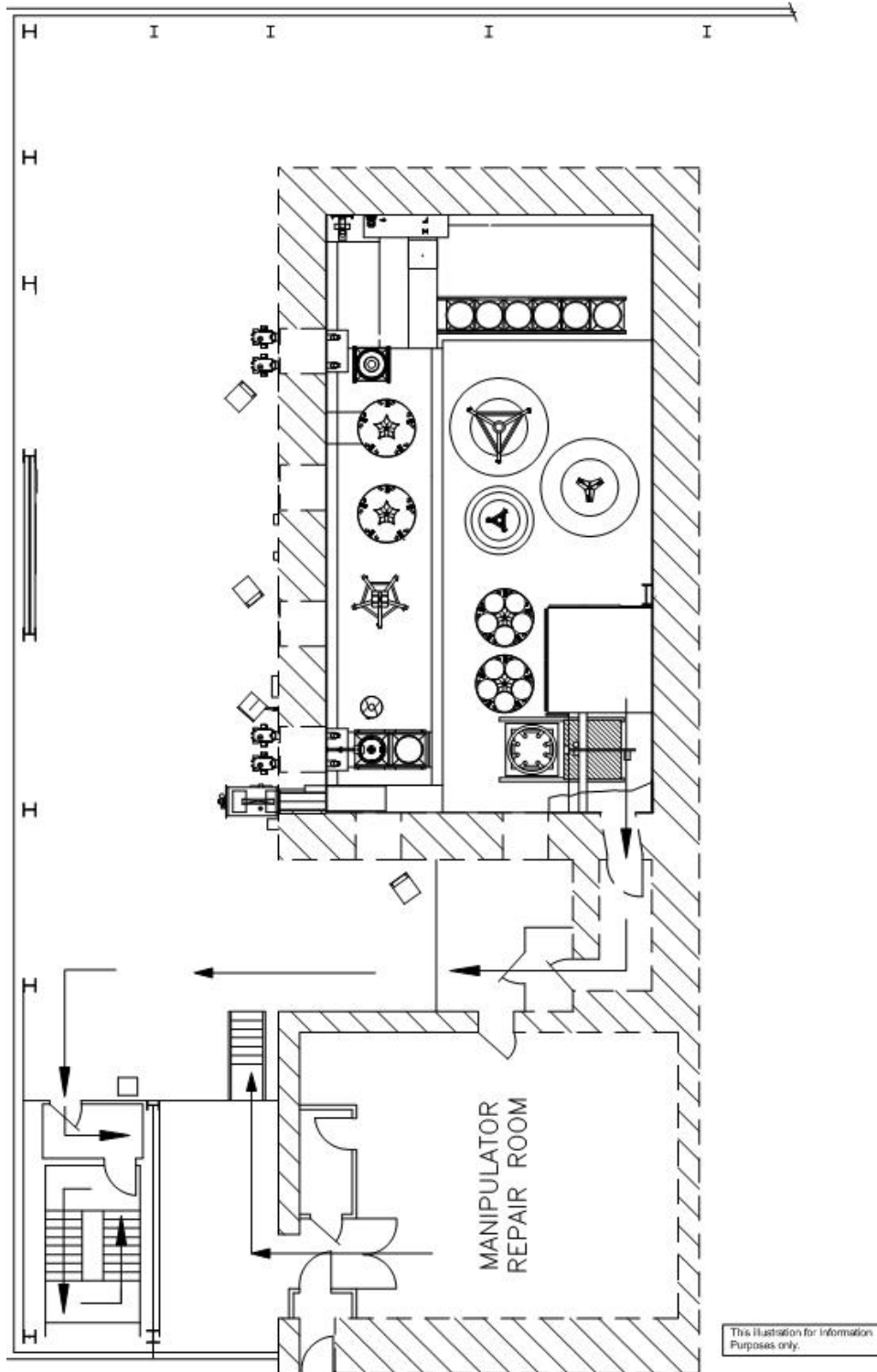


Figure D-6b
RH Bay Hot Cell Evacuation Route

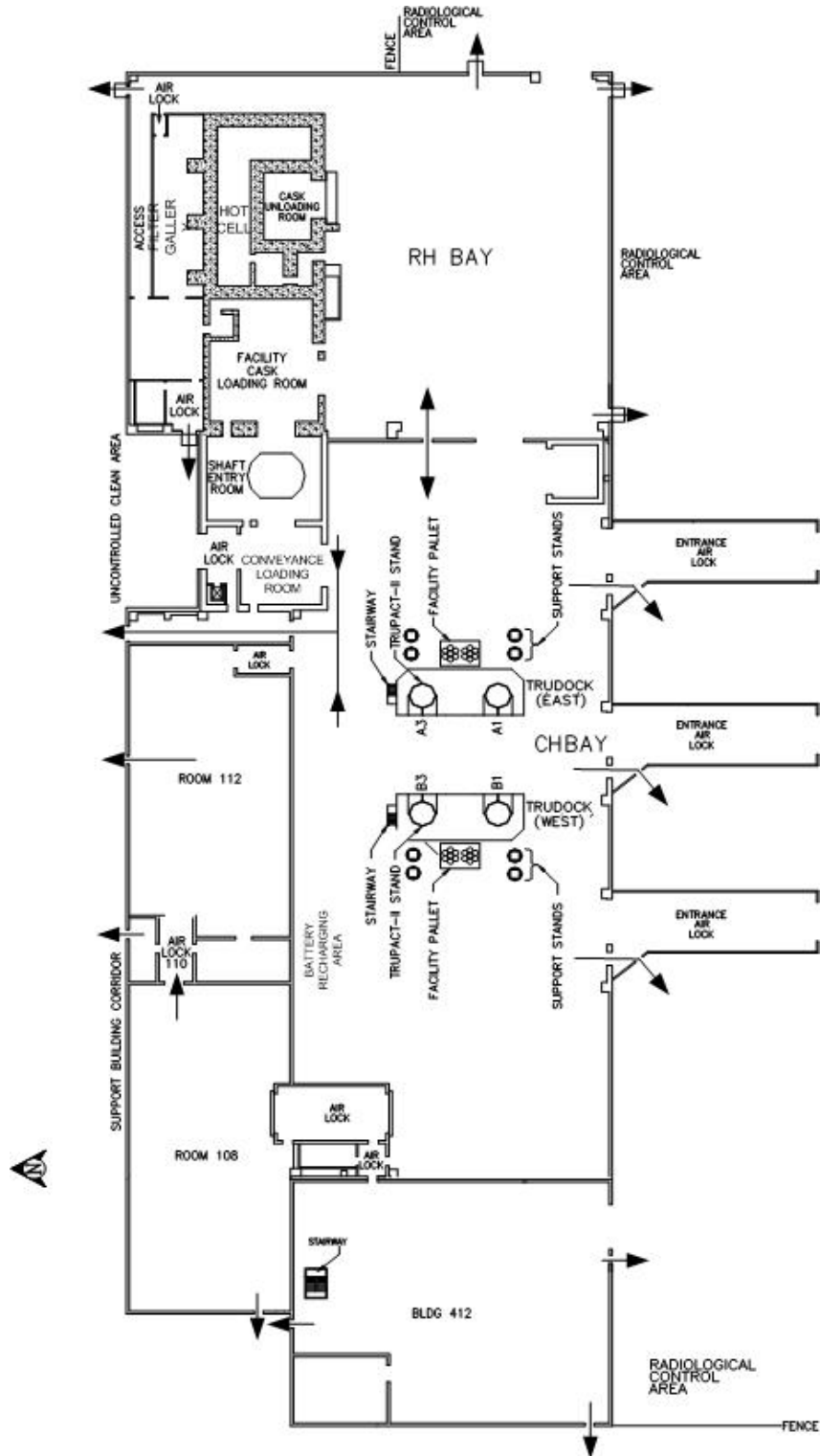
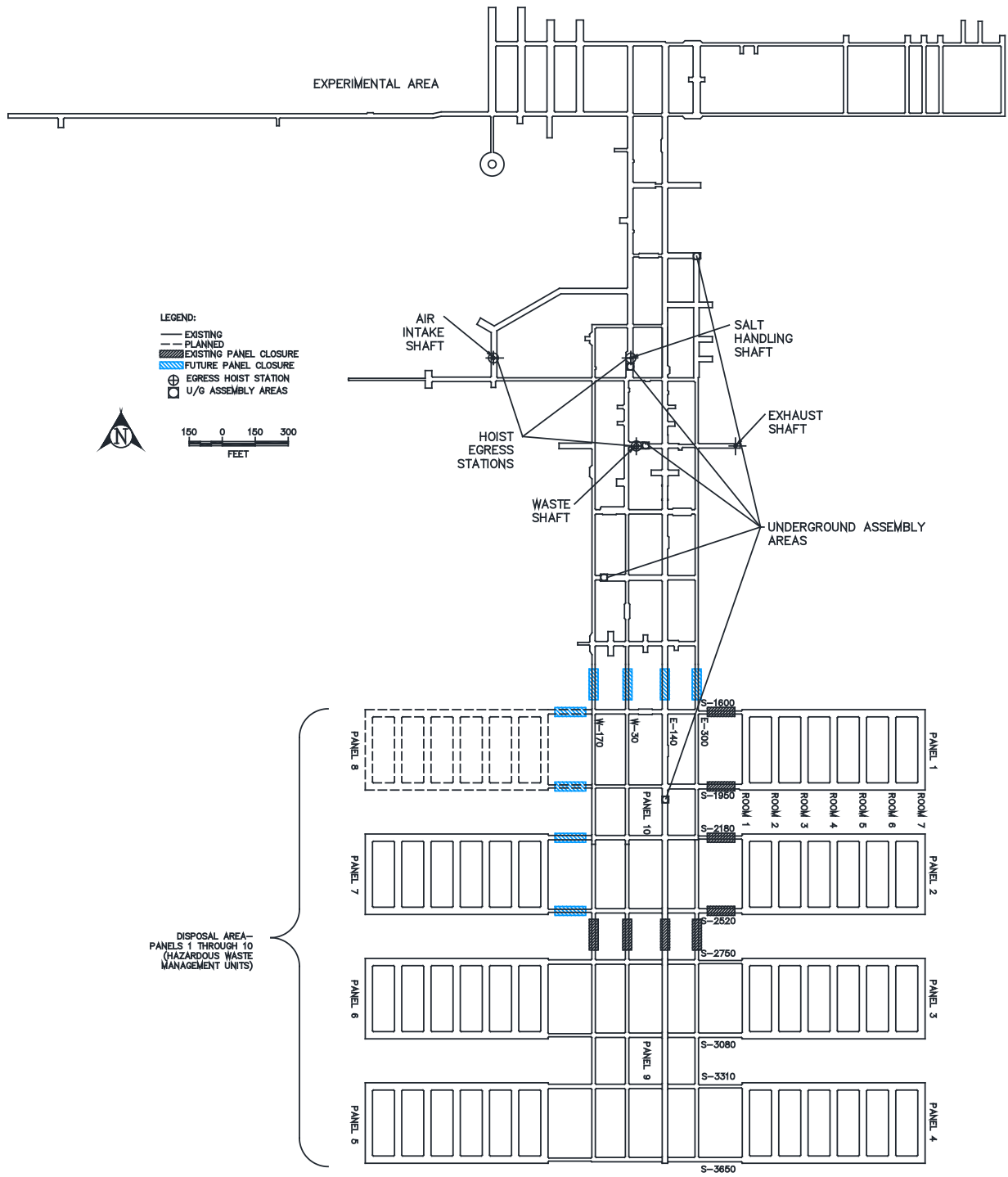


Figure D-6c
Evacuation Routes in the Waste Handling Building



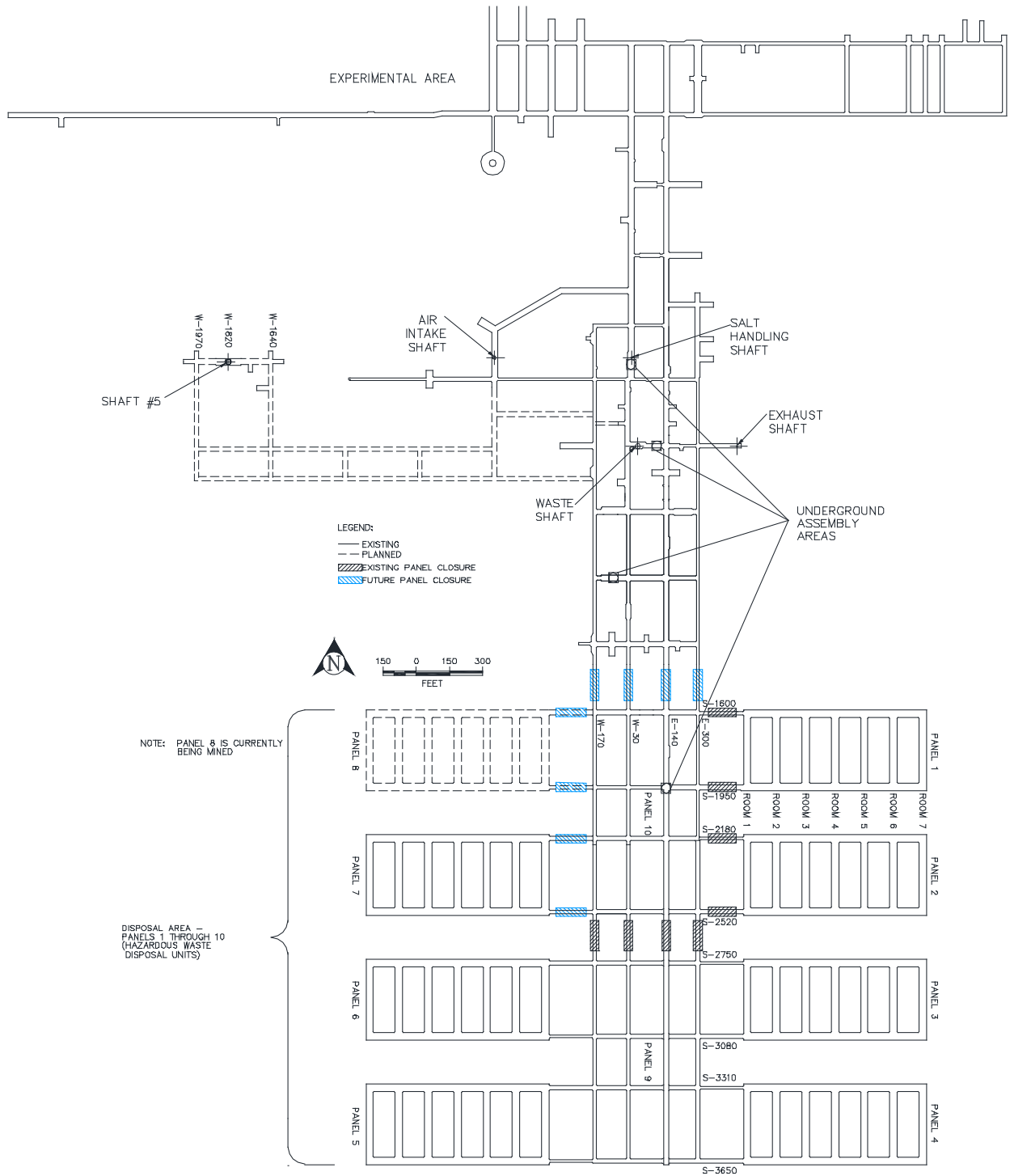
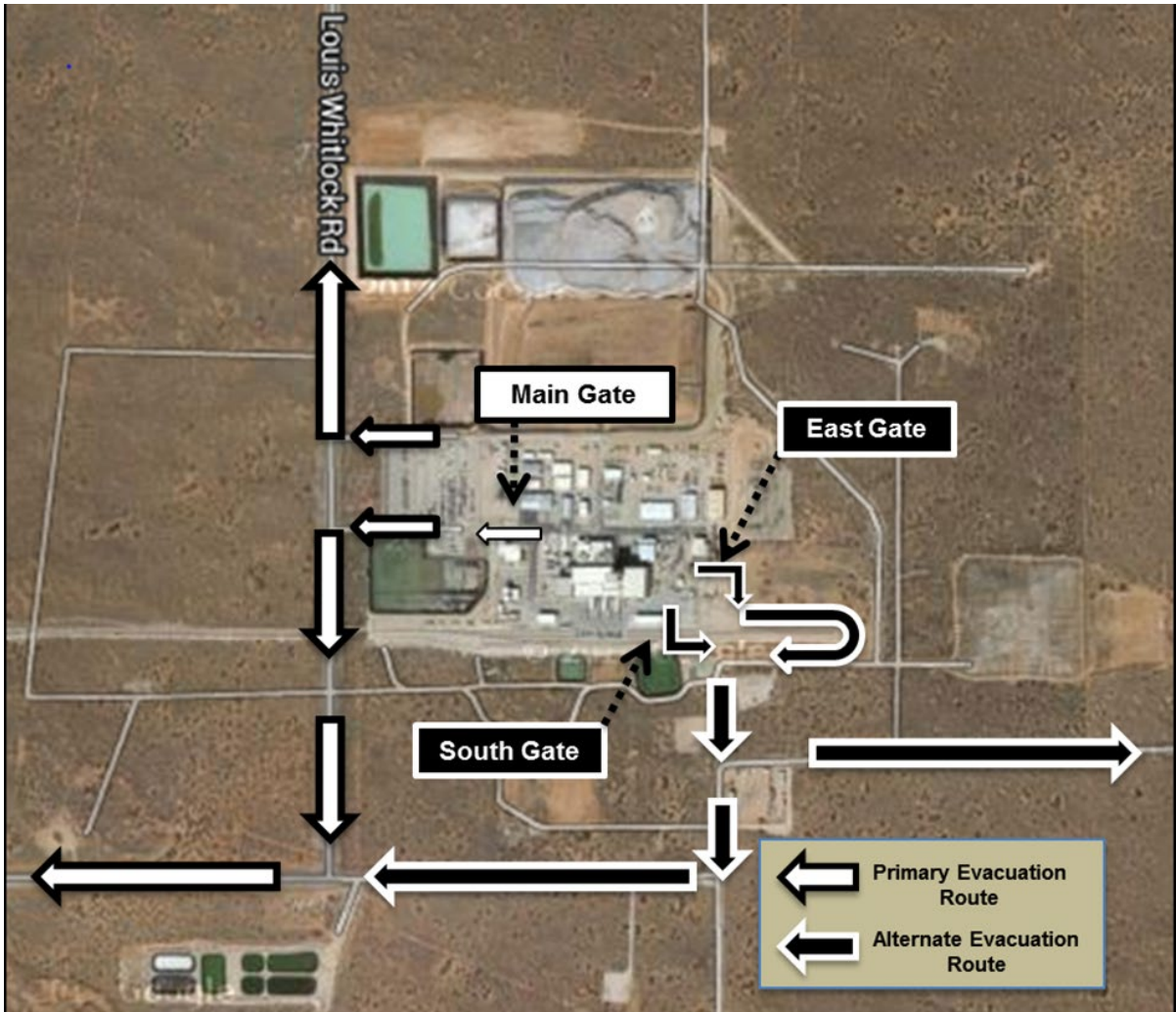


Figure D-7
Designated Underground Assembly Areas



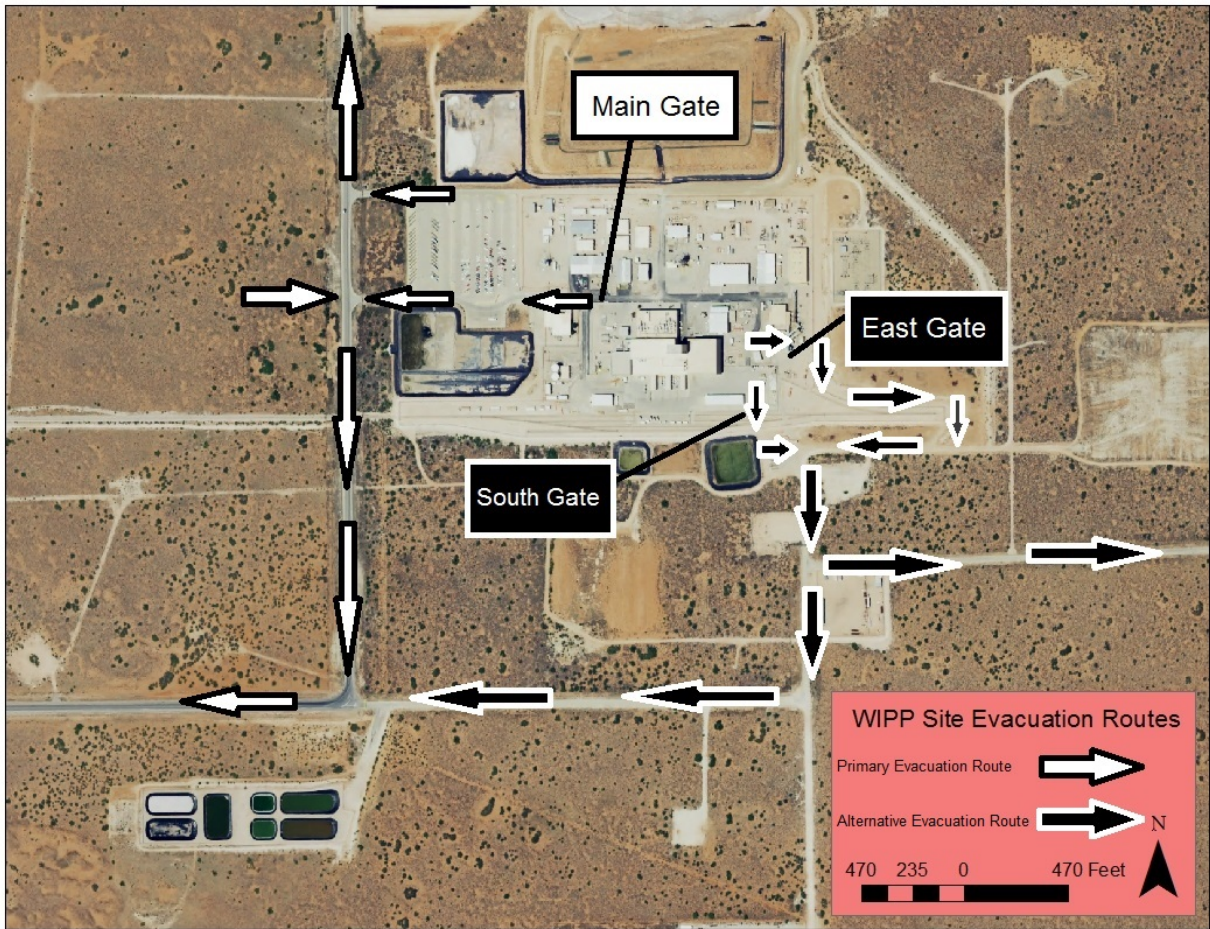


Figure D-8
WIPP Site Evacuation Map

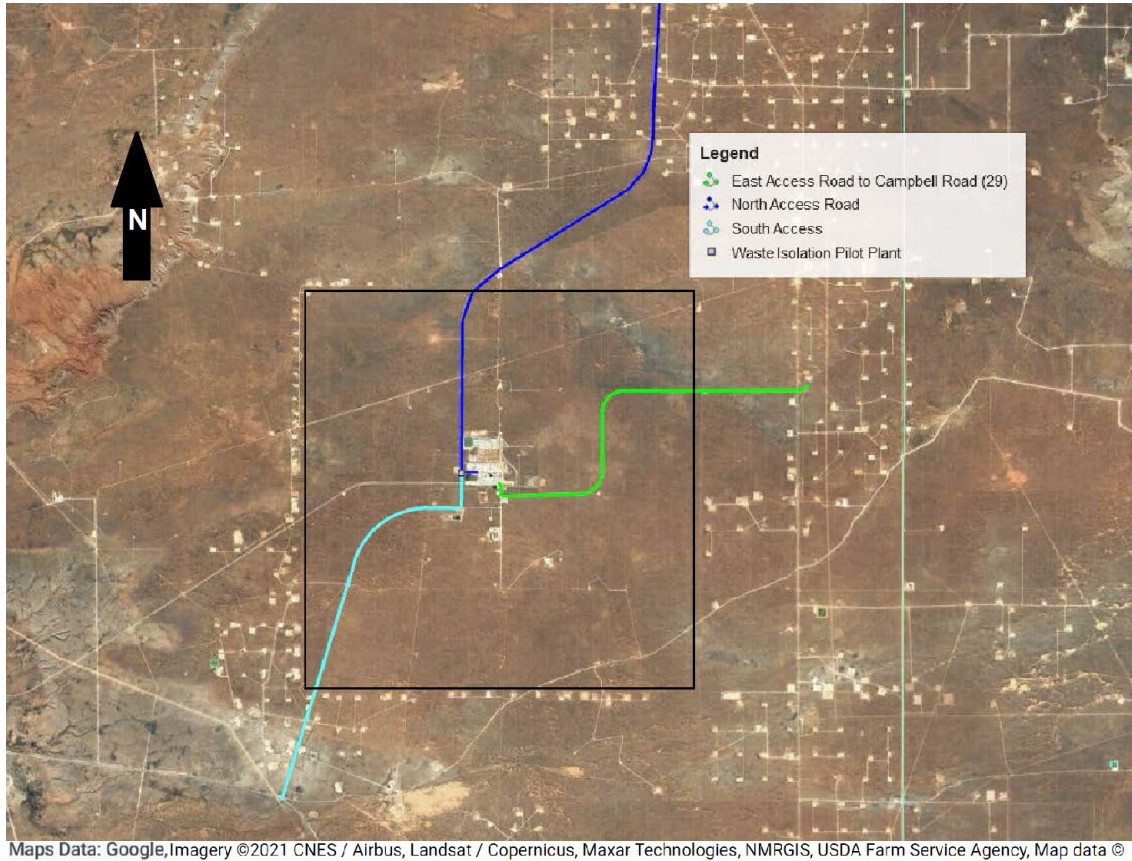


Figure D-8a
WIPP Site Evacuation Routes