

PERMIT ATTACHMENT G PREPAREDNESS AND PREVENTION PROCEDURES

The Holloman Air Force Base (**HAFB**) Container Storage Unit (**CSU/the Unit**) is designed, constructed, maintained, and shall be operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.30 through §264.37. This Attachment contains a discussion about the following items:

- A list of equipment that is required at the CSU (e.g., portable fire extinguishers);
- An equipment testing and maintenance schedule;
- Description of employee access to communication and alarm systems;
- Aisle space requirements;
- Documentation of arrangements with local authorities (e.g., local fire department); and
- Management procedures for ignitable, reactive, and incompatible wastes.

Required Equipment

The CSU is equipped with the following equipment:

- **An internal communications system**

The internal communications system consists of an emergency alarm. This alarm system is capable of providing immediate emergency instruction (by sound signal) to facility personnel. The alarm is located along the exterior southeast wall of the indoor storage building. This fire alarm is connected to the Base-wide Fire Department notification system.

- **A telephone** that is immediately available at the scene of operations. Personnel also carry a **hand-held two-way radio** that is capable of summoning emergency assistance.
- **Portable fire extinguishers spill control equipment, and decontamination equipment.** There are four fire extinguishers (two located inside the indoor storage building and two located at the outdoor storage building). Appropriate spill control equipment (including absorbent pads, salvage drums, a non-sparking shovel) and appropriate personnel protective equipment (including face shields, boots, gloves) are readily available at the CSU. On-site

decontamination equipment includes three eyewash and safety shower stations that are accessible from the indoor and outdoor storage buildings.

- **Water at adequate volume and pressure to supply water hose streams.**

Water for fire control is not directly available at the unit. The Base Fire Department trucks are available at all times for emergency response. Fire-fighting vehicles are fitted for connection to the two nearby fire hydrants located approximately 120 yards north and 50 yards southwest of the CSU. These hydrants can deliver 750 gallons per minute of flow at a pressure of 50 psi.

Testing and Maintenance of Equipment

All facility communication and alarm systems, fire protection equipment, spill control equipment, and decontamination equipment shall be inspected, tested, and maintained as necessary to assure its proper operation in time of emergency. Permit Attachment I, Table I-1, *Records Retention Times*, provides time frames for performing these checks.

Access to Communications or Alarm Systems

Whenever employees are handling containerized hazardous waste, they have access to telephones in both the Defense Re-utilization and Marketing Office (DRMO) Administrative Building (Building 112) and the indoor container storage area (Building 118). Employees also wear a two-way hand-held radio when working at the CSU. The fire alarm located at the CSU also provides immediate emergency notice to the Base Fire Department. Each of these pieces of equipment is capable of summoning external emergency assistance. If there is ever just one employee on the premises while the facility is operating, he or she has access to all of the communications and alarm system discussed above.

During non-operational hours (e.g., at night), Holloman Air Force Base Security Forces Squadron provides security checks of the outer fence of the DRMO complex to ensure that the storage building is secure.

External communication capabilities are provided through the Base Operator. Communications systems include the Defense Switching Network and U.S. West Communications, both of which allow communication with other Air Force Bases as well as off-site personnel.

Required Aisle Space

The CSU operators maintain sufficient aisle space to allow the unobstructed movements of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the CSU operation in an emergency.

Each of the three areas in the CSU shall meet these requirements. The outdoor storage area provides adequate aisle space for personnel movement and emergency response activities.

The arrangement of containers in the 20 ft by 50 ft staging area is always configured to meet aisle space requirements and to ensure that the forklifts, personnel, fire protection equipment, spill control equipment, and decontamination equipment can safely access the hazardous waste containers.

Within the indoor storage area, two 10 ft-wide rows span the building length and provide ample space for movement among the containment cells and for immediate response actions. Figure B-6 of Permit Attachment B illustrates the configuration of the indoor storage area.

Arrangements with Local Authorities

The Security Forces Squadron, Base Fire Department, the City of Alamogordo, and on-site Base medical facilities shall respond to emergency incidents at the CSU. The Base Fire Department is the primary emergency response authority (i.e., not the local fire department) and shall respond to any emergency at the CSU.

HAFB Fire Department personnel are familiar with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the Unit, and possible evacuation routes. Personnel at the Base medical facility are trained to respond to emergency incidents involving chemical exposure.

In the event of an emergency, the emergency response procedures outlined in the Contingency Plan, Permit Attachment H of this document will be followed. These procedures include notifying state emergency response teams, emergency response contractors, and equipment suppliers, as necessary.

Management of Ignitable, Reactive, and Incompatible Wastes

The prevention of accidental ignition or unplanned reaction of ignitable, reactive, or incompatible waste is achieved by a combination of facility design and operating practices. The design standards and operating practices related to accident prevention are presented in Permit Attachment C of this Permit.

Hazard Prevention Procedures, Structures, and Equipment

This section provides a description of the handling techniques and facility design standards that prevent hazards from occurring that would endanger human health or the environment. The procedures, structures, and equipment associated with the operation of the CSU are designed to prevent hazards, such as spills, fires, or mixing of incompatible wastes that are posed by the wastes at the facility.

Permit Attachment C of this Permit describes the container management practices, including procedures to prevent spills or ruptures during loading and unloading activities, run-on and run-off prevention measures, and proper management and storage procedures.

Drain Lines

The closest sanitary sewer drain lines are located approximately 100 yards north of the CSU at the DRMO Administration building. The nearest storm sewer is located approximately 50 ft southeast of the facility.

Equipment Failure and Power Outages

The Container Storage Unit only manages and stores containerized waste; therefore no automatic waste feed cutoff systems exist. In the event of a brief power interruption, all waste-handling and inspection activities cease until power shall be restored. Loaded forklifts shall complete a single transfer operation, if so engaged. Otherwise, only spill cleanup activities would continue under the circumstances using natural light that enters the building through the open garage doors.

Personnel Protective Equipment

A description of available protective equipment at the CSU is presented in Table H-1 of the Contingency Plan contained in Permit Attachment H of this permit. The use of protective equipment, discussed in Permit Attachment J, *Personnel Training*, describes the types of training that the CSU operators must complete in order to work at the Unit. The information in the Contingency and Personnel Training Plans indicates that only personnel wearing the appropriate protective equipment will accomplish any operations, such as bulking and consolidating of hazardous wastes. Equipment will generally include, but not be limited to, respirators, protective gloves, eye and face guards, chemical-resistant overalls, and boots.

Personnel must be familiar with the disposal turn-in documentation, Material Safety Data Sheets and/or other references for each waste that will be handled in order to determine which safety equipment is appropriate.

The level of protective equipment used at the CSU is normally referred to as Level D protection equipment. In the event of a spill or other imminent hazard, the Fire Department and Spill Response Team (if necessary) are capable of outfitting in Level A protection equipment (i.e., full encapsulating suit and self-contained breathing apparatus, if necessary).

Prevention of Releases to the Atmosphere

The design of the CSU and operating procedures, including the use of DOT containers shall prevent the releases of hazardous waste to the atmosphere. A detailed discussion of the facility design and operating procedures are presented in Permit Attachment B (General Facility Description). If an incident requiring emergency response occurs, procedures outlined in the Contingency Plan in Permit Attachment H shall be followed to immediately remedy the situation.