



**Environmental Protection Division  
Environmental Compliance Programs (ENV-CP)**  
PO Box 1663, K490  
Los Alamos, New Mexico 87545  
(505) 667-0666

**National Nuclear Security Administration  
Los Alamos Field Office, A316**  
3747 West Jemez Road  
Los Alamos, New Mexico, 87545  
(505) 667-5794/Fax (505) 667-5948

*Date:* **SEP 22 2014**  
*Symbol:* ENV-DO-14-0234  
*LAUR:* 14-26586  
*Locates Action No.:* Not Applicable

Mr. John E. Kieling, Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303

Dear Mr. Kieling:

**Subject: Notification of Class 1 Permit Modification to Update Attachment D, Contingency Plan and Permit Part 2, General Facility Conditions, of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID # NM0890010515**

The purpose of this letter is to notify the New Mexico Environment Department's Hazardous Waste Bureau (NMED-HWB) of a Class 1 permit modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit. The Permit was issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), the Permittees, in November 2010. This modification includes an update to an organization name within Attachment D, *Contingency Plan* and Permit Part 2, *General Facility Conditions*.

The Permittees have prepared this permit modification in accordance with Title 40 of the Code of Federal Regulations (40 CFR) § 270.42(a)(1). All of the changes made to the Permit as part of this modification fall under Appendix I of 40 CFR §270.42. Attachment D, *Contingency Plan* and Permit Part 2, *General Facility Conditions* require an organizational name change that fall under Item (B)(6)(d). A full description of the permit modification and the necessary changes has been included in Enclosure 1 (LAUR-14-26586).

This permit modification notification includes this letter and an enclosure that contains a description of the permit modification, text edits of the Permit sections and a signed certification page. Three hard copies and one electronic copy of this submittal will be delivered to the NMED-HWB. The hardcopy submittal contains pages or sections where text has been changed rather than copies of full attachments of the Permit. The electronic copy contains a reproduction of the hardcopy in portable document format (PDF) along with all the word processing files used to create the hardcopy.

Notification of this modification will be sent to the NMED-HWB-maintained LANL facility mailing list in accordance with 40 CFR § 270.42(a)(1)(ii) within ninety days of the transmittal of this permit modification request. If you have comments or questions regarding this permit modification, please contact Gene E. Turner, DOE, at (505) 667-5794 or Mark P. Haagenstad, LANS, at (505) 665-2014.

Sincerely,



Alison M. Dorries  
Division Leader  
Environmental Protection Division  
Los Alamos National Security LLC

Sincerely,



Kimberly Davis Lebak  
Manager  
Los Alamos Field Office  
U.S. Department of Energy

AMD:KDL:TDD/ms

Enclosures: (1) Class 1 Permit Modification Notification to Update Attachment D, Contingency Plan and Permit Part 2, General Facility Conditions, of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, September 2014  
(2) Certification

Cy: Laurie King, USEPA/Region 6, Dallas, TX, (E-File)  
Dave Cobrain, NMED/HWB, Santa Fe, NM, (E-File)  
Tim Hall, NMED/HWB, Santa Fe, NM, (E-File)  
Peter Maggiore, NA-LA, (E-File)  
Gene E. Turner, NA-LA, (E-File)  
Kirsten Laskey, NA-LA, (E-File)  
Carl A. Beard, PADOPS, (E-File to [aosburn@lanl.gov](mailto:aosburn@lanl.gov))  
Michael T. Brandt, ADESH, (E-File)  
Raeanna Sharp-Geiger, ADESH, (E-File)  
Alison M. Dorries, ENV-DO, (E-File)  
Marla J. Brooks, EM-ER, (E-File)  
Kathryn M. Roberts, REG-SP, (E-File)  
Mark P. Haagenstad, ENV-CP, (E-File)  
Luciana Vigil-Holterman, ENV-CP, (E-File)  
Jeff A. Carmichael, ENV-CP, (E-File)  
Elizabeth W. English, REG-SP, (E-File)  
Tammy D. Diaz, ENV-CP, (E-File)  
[lasomailbox@nnsa.doe.gov](mailto:lasomailbox@nnsa.doe.gov), (E-File)  
[locatsteam@lanl.gov](mailto:locatsteam@lanl.gov), (E-File)  
[env-correspondence@lanl.gov](mailto:env-correspondence@lanl.gov), (E-File)





COPY



Environmental Protection Division
Environmental Compliance Programs (ENV-CP)
PO Box 1663, K490
Los Alamos, New Mexico 87545
(505) 667-0666

National Nuclear Security Administration
Los Alamos Field Office, A316
3747 West Jemez Road
Los Alamos, New Mexico, 87545
(505) 667-5794/Fax (505) 667-5948

Date: SEP 22 2014
Symbol: ENV-DO-14-0234
LAUR: 14-26586

Locates Action No.: Not Applicable

RECEIVED

SEP 22 2014

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

NMED
Hazardous Waste Bureau

Dear Mr. Kieling:

Subject: Notification of Class 1 Permit Modification to Update Attachment D, Contingency Plan and Permit Part 2, General Facility Conditions, of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, EPA ID # NM0890010515

The purpose of this letter is to notify the New Mexico Environment Department's Hazardous Waste Bureau (NMED-HWB) of a Class 1 permit modification to the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit. The Permit was issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), the Permittees, in November 2010. This modification includes an update to an organization name within Attachment D, Contingency Plan and Permit Part 2, General Facility Conditions.

The Permittees have prepared this permit modification in accordance with Title 40 of the Code of Federal Regulations (40 CFR) § 270.42(a)(1). All of the changes made to the Permit as part of this modification fall under Appendix I of 40 CFR §270.42. Attachment D, Contingency Plan and Permit Part 2, General Facility Conditions require an organizational name change that fall under Item (B)(6)(d). A full description of the permit modification and the necessary changes has been included in Enclosure 1 (LAUR-14-26586).

This permit modification notification includes this letter and an enclosure that contains a description of the permit modification, text edits of the Permit sections and a signed certification page. Three hard copies and one electronic copy of this submittal will be delivered to the NMED-HWB. The hardcopy submittal contains pages or sections where text has been changed rather than copies of full attachments of the Permit. The electronic copy contains a reproduction of the hardcopy in portable document format (PDF) along with all the word processing files used to create the hardcopy.

# **ENCLOSURE 1**

**Class 1 Permit Modification Notification to Update  
Attachment D, Contingency Plan and Permit Part 2, General  
Facility Conditions, of the Los Alamos National Laboratory  
(LANL) Hazardous Waste Facility Permit, September 2014**

ENV-DO-14-0234

LA-UR-26586

Date: \_\_\_\_\_ SEP 22 2014



## Permit Modification Notification

This document contains a notification for a Class 1 Permit Modification to update the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (Permit). The text modifications are provided herein and have been made to the Permit by the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), collectively the Permittees. The modifications to the text of the Permit have been identified using red text for additions and red lines through the text for deletions.

### Description

This modification includes updates within Attachment D, *Contingency Plan* and changes within Permit Section 2, *General Facility Conditions*. Enclosure 1, *Revised Permit Text*, includes the specific changes to the Permit shown in redline and strikeout. A certification page in accordance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR) § 270.11 is included in Enclosure 2.

### Basis

This permit modification incorporates updated information that meets the conditions for Class 1 permit modifications listed within Appendix I of 40 CFR §270.42 and has been drafted accordance with 40 CFR § 270.42 (a)(1). Attachment D, *Contingency Plan*, requires updates that meet the conditions of the following items specified in 40 CFR §270.42, Appendix I, Item B.6.d organizational name and contact updates. Changes throughout Attachment D, *Contingency Plan*, include name changes for the emergency response resources. The following name changes have been made throughout various sections of Attachment D:

- Emergency Operations – Emergency Management Group (EO-EM) was changed to Security Emergency Operations 3 – Emergency Management Group (SEO-3:EM).
- Emergency Operations Division was changed to Security and Emergency Operations (SEO) Division.
- The HAZMAT Team was changed to HAZMAT Group.
- Emergency Operations Division’s Emergency Response Group (EO-ER) was changed to Security and Emergency Operations Division’s Emergency Response Group (SEO-1:ER)

Changes within Permit Part 2, *General Facility Conditions*, Section 2.10.5, *Arrangements with Local Authorities*, include administrative and informational changes (Item A.1) that are reflective of updates throughout the *Contingency Plan*. This change consists of a name change from “Emergency Management Group Leader and Emergency Planning and Preparedness Team

**Leader' to "Security and Operations Division Leader and Security and Emergency Operations-3: Emergency Management Group Leader".**

**Position Description**

The incumbent will be responsible for the overall management and coordination of the Security and Emergency Operations Division. This includes the development and implementation of policies, procedures, and plans for the division. The incumbent will also be responsible for the supervision and training of staff, and for the coordination of the division's activities with other departments and agencies. The incumbent will also be responsible for the management of the division's budget and resources.

**Responsibilities**

The incumbent will be responsible for the overall management and coordination of the Security and Emergency Operations Division. This includes the development and implementation of policies, procedures, and plans for the division. The incumbent will also be responsible for the supervision and training of staff, and for the coordination of the division's activities with other departments and agencies. The incumbent will also be responsible for the management of the division's budget and resources.

**Qualifications**

The incumbent must have a minimum of five years of experience in a similar position. The incumbent must also have a minimum of a Bachelor's degree in a related field. The incumbent must also have a minimum of five years of experience in the management of a large organization. The incumbent must also have a minimum of five years of experience in the management of a budget and resources.

- Bachelor's degree in a related field
- Five years of experience in a similar position
- Five years of experience in the management of a large organization
- Five years of experience in the management of a budget and resources

The incumbent must also have a minimum of five years of experience in the management of a large organization. The incumbent must also have a minimum of five years of experience in the management of a budget and resources.

# ATTACHMENT D TECHNICAL CONTINGENCY PLAN

The following technical contingency measures are included in this plan to ensure that the project can continue to operate in the event of a major system failure. The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure. The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure.

## CONTINGENCY PLAN AND RECOVERY PROCEDURES

The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure. The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure. The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure.

### ATTACHMENT D CONTINGENCY PLAN

The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure. The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure. The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure.

The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure. The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure. The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure.

The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure. The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure. The contingency plan is designed to ensure that the project can continue to operate in the event of a major system failure.



## ATTACHMENT D

### GENERAL CONTINGENCY PLAN

This Attachment presents contingency measures applicable to all permitted hazardous or mixed waste management units. The Permittees shall implement the provisions of this Plan and the applicable provisions of Permit Part 2 (*General Facility Conditions*) immediately to minimize hazards whenever there is a fire, explosion, or release of hazardous or mixed waste or hazardous or mixed waste constituents that could threaten human health or the environment.

#### D.1 HAZARDOUS AND MIXED WASTE EMERGENCY RESPONSE RESOURCES

1. The management of hazardous and mixed waste emergency incidents at the Facility resides within Permittees' ~~Security Emergency Operations~~ ~~Emergency Operations~~ - Emergency Management Group (SEO-3:-EM). During an emergency situation, line management (*i.e.*, the Line Manager of the affected area) works with an Emergency Manager serving as the SEO-3:-EM Duty Officer from the SEO-3:-EM Group. The Emergency Manager has primary responsibility for managing emergency response operations, directing the Emergency Operations Support Center (EOSC) to make appropriate notifications, and activating the emergency response organizations. The Emergency Manager has authority to assume the role of Incident Commander (IC) during an emergency and typically assumes full responsibility for management of the emergency response operations at the scene. (Personnel from other organizations, such as the Federal Bureau of Investigation or the Los Alamos Fire Department [LAFD], may also assume the role of IC, depending upon the type of emergency and responding organizations.) Additional Facility resources that may provide assistance in an emergency include personnel from health physics, industrial hygiene, environment compliance, emergency response, and radiation protection personnel at the Facility. These personnel as well as other resources are discussed in Attachment Sections D.1.2, D.1.3, and D.1.6 of this Attachment.

2. Laboratory-contracted support services and other agencies shall also be available for assistance during emergencies. These are discussed in Attachment Section D.1.5 and include the contracted services for security and the LAFD. These contracted services, if changed, shall be replaced and/or supplemented with functionally equivalent contracted services required to assume the same duties and responsibilities described in this section. Other outside response agencies are discussed in Section D.1.7 and include the Los Alamos Police Department (LAPD) and the Los Alamos Medical Center (LAMC). The LAPD and the LAMC each provide assistance under a memorandum of understanding with the U.S. Department of Energy (DOE).

3. The Permittees shall use the Incident Command System (ICS) in response to all emergencies. The ICS is based on the on-scene management response structure protocols of the National Incident Management System (NIMS). The NIMS is a national standard that provides a solid foundation for an effective and integrated emergency response both locally and nationally, if necessary.

4. The IC (*e.g.*, SEO-3:EM Duty Officer) coordinates all groups and agencies responding to the emergency and personnel operating at the scene using the ICS. The General Hazardous Waste Emergency Notification Structure, illustrated on Figure D-1, is designed to expand and contract, as appropriate, to include the response groups/agencies needed to address any particular emergency. The EOSC provides notification to on-site and off-site groups and agencies for both response requests and information.
5. The IC may appoint and utilize a network of support personnel to assess, plan for, and mitigate emergencies. These personnel can include, but are not limited to, a Safety Officer, a Public Information Officer, and a Liaison Officer that report directly to the IC and are responsible for issues related to safety, information, and the interaction of various groups associated with the overall emergency. Also reporting directly to the IC are an Operations Section Chief, Logistics Section Chief, Planning Section Chief, and an Administrative Section Chief. The Operations Section Chief oversees the Fire Branch, the Emergency Medical Services Branch, and the Hazardous Material Group, and is responsible for mitigating the emergency response. The Logistics Section Chief is responsible for providing support personnel and equipment necessary for the emergency response. The Planning Section Chief is responsible for planning the mitigation and recovery activities for the emergency. The Administrative Section Chief is responsible for keeping records of expenditures. These ICS positions are listed in Figure D-1. The appropriate ICS positions will be activated as the emergency warrants. During an emergency at the Facility, assistance may be provided to the IC and the IC's appointees by a large variety of response groups/agencies. The responsibilities and/or assistance available from the various response groups/agencies are discussed briefly in Attachment Sections D.1.2 through D.1.7 and the appropriate representatives will be contacted during an emergency as appropriate.
6. The Permittees shall provide a copy of this Contingency Plan and any revisions to each of the emergency response groups/agencies (including the LAPD, LAFD, LAMC, and the State of New Mexico's Department of Homeland Security and Emergency Management (DHSEM) Area 3 Emergency Management Coordinator).

#### **D.1.1 Emergency Operations-Emergency Management Group**

1. The Permittees shall delegate the authority and responsibility for administering and implementing the Facility's emergency management program to the Security and Emergency Operations (SEO) Division, which includes SEO-3:EM. ~~SEO Emergency Operations~~ Division personnel shall coordinate and issue the Facility's Los Alamos National Laboratory and Los Alamos Field Office Hazardous Materials Program Plan; SEO-3:EM provides response coordination for emergencies. SEO-3:EM provides a 24-hour Emergency Operations Support Center (EOSC) for the Facility and an Emergency Manager serving as the 24-hour Duty Officer to respond to emergencies, including hazardous and mixed waste releases. The Facility Emergency Manager (*i.e.*, the SEO-3:EM Duty Officer) is the functional equivalent of the Emergency Coordinator (40 CFR § 264.55). The SEO-3:EM maintains an Emergency Operations Center (EOC) in a ready condition, should a center be required. The primary EOC is located at TA-69, Building 33 (TA-69-33). An alternate mobile EOC is equipped and ready for



immediate deployment. Should an EOC be activated during an emergency, additional emergency personnel can be requested by the IC through the EOC.

2. Assignment as the SEO-3:EM Duty Officer is rotated. The Duty Officer can be reached 24 hours a day by contacting the EOSC at 667-6211.
3. The SEO-3:EM Duty Officer will respond to emergency incidents involving the release of hazardous or mixed waste to the environment, including spills, fires, and explosions. With input from the appropriate Facility groups, the SEO-3:EM Duty Officer shall initially assess the possible hazards to human health or the environment and, if assuming incident command, shall use whatever response personnel and/or emergency equipment necessary to control and contain the waste. In the event of an emergency, the SEO-3:EM Duty Officer typically becomes the IC with full responsibility for field activities. As described previously, the exception to this is when on-site personnel can adequately address the emergency and maintain incident command internally.
4. The SEO-3:EM Duty Officer responding to an emergency shall have access to various tools to include Emergency Actions Levels with prescribed protective actions and ChemLog with a current chemical inventory of the appropriate building(s) in the area in which the incident is occurring. These tools shall be maintained by the EOC with assistance from the facility manager where a waste management unit is located and shall be available at the EOC at TA-69; located on-site for use by emergency response personnel; and available to SEO-3:EM Duty Officers by computer. The various response groups shall obtain specific information relating to the facilities involved (including the layout of all affected buildings; the location of evacuation routes, equipment, and personnel; properties of the materials/wastes managed at the facility; and the hazards associated with these materials/wastes) from other site-specific information.
5. The Permittees shall ensure that the names, addresses, and telephone numbers listed below are the current Primary and Alternate Emergency Managers.

Primary:

Brenda Andersen  
3926 A Alabama  
Los Alamos, NM  
(H) 505-662-4173  
(W) 505-667-6211  
(C) 505-699-1144



Alternates:

Ron Huerta  
P.O. Box 923  
Alcalde, NM  
(H) 505-852-0286  
(W) 505-667-6211  
(C) 505-412-8434

Wil Martinez  
120 A RA CR 92  
Chimayo, NM  
(H) 505-351-2340  
(W) 505-667-6211  
(C) 505-412-8135

Dave McClard  
23 Ojito Drive  
Espanola, NM  
(H) 505-412-8945  
(W) 505-667-6211  
(C) 505-699-0803

6. To assure timely notifications and immediate response during an emergency, the Permittees shall ensure that the telephone numbers 911 or 667-6211 are contacted to obtain the on-call SEO-3 EM Duty Officer.

**D.1.2 Hazardous Materials Response**

1. The Hazardous Materials (HAZMAT) GroupTeam is responsible for the aggressive mitigation of chemical, radiological, hazardous waste, and mixed waste emergencies, including field decontamination of responders and response equipment. At the request of the IC, the HAZMAT GroupTeam may provide limited field decontamination support for victims. The HAZMAT GroupTeam is capable of providing a decontamination station at the scene of a hazardous material incident to process people working in a contaminated area and is prepared to perform decontamination of personnel. The HAZMAT TeamGroup shall meet the training criteria for emergency response personnel specified in the Code of Federal Regulations, Title 29, §1910.120(q)(6)(iii), (iv), and (v). The HAZMAT GroupTeam acts as part of the ICS reporting directly to IC, or the Operations Section Chief if the position is staffed.

2. During an emergency response, the HAZMAT GroupTeam may also provide site field monitoring to determine the nature and extent of contamination, provide information on correct handling of chemicals, make recommendations on protective clothing and equipment, and provide exposure and treatment information to responders. The field monitoring team leader supervises field monitoring activities to determine the boundaries of the potential release. The

HAZMAT GroupTeam may obtain resources from environmental monitoring groups, such as health physics and industrial hygiene personnel.

### **D.1.3 Environmental Protection Division and Waste Management Division Response**

At the scene, representatives and technical advisors from Environmental Protection Division (ENV), Waste Management Division (WM), and other response personnel are coordinated by the IC. In addition to their post-emergency duties, they may also be responsible for on-scene emergency operations such as planning. Depending on the type of emergency and the associated hazards, an individual from the most relevant group in the ENV shall provide technical support and shall ensure the Permittees' compliance with applicable federal, state, and local regulations.

#### **D.1.3.1 Ecology Personnel**

Ecology personnel provide field surveys of soil, foodstuffs, and biota to determine environmental effects of exposure after an emergency.

#### **D.1.3.2 Meteorology and Air Quality Personnel**

Meteorology and air quality personnel provide field surveys of air to determine environmental impacts and dose equivalent to members of the public after a radiological emergency. In addition, they provide expertise in meteorology to project short- and long-term environmental effects of emergency conditions.

#### **D.1.3.3 Hazardous Waste Compliance Personnel**

Hazardous waste compliance personnel provide guidance on regulatory requirements for proper treatment, storage, and transportation of hazardous and mixed wastes to other Facility groups. After an emergency, waste management sampling personnel may provide field sampling (e.g., of soil, spills, or potentially hazardous waste) to determine environmental effects of exposure.

#### **D.1.3.4 Water Quality and Hydrology Personnel**

After an emergency, water quality and hydrology personnel provide sampling of surface water runoff and sediments to determine the environmental effects of an emergency and perform assessments for regulatory reporting requirements. They also provide expertise in hydrogeology to establish short- and long-term environmental effects of emergency conditions.

### **D.1.4 Other Facility Response Resources**

Emergency response personnel from the Plutonium Manufacturing and Technology Division at TA-55 are trained to respond to emergencies at that facility. Personnel from the Los Alamos National Laboratory (LANL) Transuranic Program may provide guidance on proper treatment, storage, and transportation of hazardous and mixed waste at TA-50 and TA-54.

### **D.1.5 Contracted Response**

Contracted response groups' representatives may report directly to the Incident Command Post (ICP), if requested. If the IC deems it necessary, the IC may designate an Operations Section Chief to aid in the coordination and direction of these groups. In addition, contracted response groups may report to a staging area, with a representative going either to the ICP or, if activated, to the EOC.

#### **D.1.5.1 Security Services**

Security personnel provide security service to the Facility. During an emergency, these activities include maintaining security, directing traffic within the Facility, and controlling access to the emergency scene. Security personnel maintain the necessary equipment (such as crowd-control equipment and patrol vehicles) to perform these functions.

#### **D.1.5.2 Maintenance Site Services**

Maintenance Site Services (MSS) provides a maintenance support force to the Facility. This support force is under the Permittees' direction in an emergency. MSS also provides a representative to the Facility in the event of an emergency and participates, as necessary, in post-emergency cleanup under the direction of a Recovery Manager designated by the IC. The duties of the Recovery Manager are discussed in Attachment Section D.10.

#### **D.1.5.3 Los Alamos Fire Department**

The LAFD provides fire protection and ambulance coverage for the residential communities of Los Alamos and White Rock and for the Facility. In the case of an emergency within the Facility, the LAFD coordinates fire suppression and Emergency Medical Services. The IC retains overall responsibility for the emergency response effort.

### **D.1.6 Facility Support**

#### **D.1.6.1 Health Physics Operations**

Radiation protection personnel perform routine site evaluation and monitoring to determine radiological conditions in facilities. They also provide guidance on radiological decontamination. In addition, this group augments the assessment and monitoring functions of the HAZMAT Team Group.

#### **D.1.6.2 Occupational Medicine Personnel**

1. The Facility maintains its own medical facility operated by occupational medicine personnel. Occupational medicine personnel provide appropriate medical treatment for occupation-related illnesses and injuries and monitors employees to assess the effectiveness of health protection programs.



2. Although occupational medicine personnel are not routinely involved with on-scene emergency response, the group maintains a central medical facility with a fully equipped emergency room and decontamination facilities at TA-3, Building 1411. The location of this and other emergency facilities are shown on Figure 49 in Attachment N (*Figures*). Medical staff at these facilities includes physicians, physician assistants, nurse practitioners, nurses, technicians, psychologists and counselors. All full-time medical providers and nurses receive radiation accident training. Occupational medicine personnel also maintain access to a database that provides the clinical staff with timely toxic exposure and treatment information.

#### **D.1.6.3 Industrial Hygiene and Safety Personnel**

Industrial hygiene and safety personnel assist occupational medicine personnel with their ability to obtain additional exposure and treatment information. In addition, they maintain computer access to the National Institute of Occupational Safety and Health Technical Information Center and the Registry of Toxic Effects of Chemical Substances. During routine operations, these personnel perform site evaluations and field testing to determine the nature and extent of chemical contamination and specify protective clothing and equipment.

#### **D.1.6.4 Performance Assurance Office**

The Performance Assurance Office assists the facility manager in investigating all adverse environmental, safety, health, and operational occurrences (on-site and off-site), determining the causal factors, identifying the appropriate corrective actions, and assisting in the preparation of reports documenting the occurrence to DOE. This group tracks corrective actions associated with such occurrences and maintains the information in an on-site database.

#### **D.1.7 Outside Response Agencies**

During an emergency, outside response agencies report directly to the IC. A Liaison Officer or an Operations Section Chief, designated by the IC, may aid in coordinating and directing the groups responding to an emergency.

##### **D.1.7.1 Los Alamos Police Department**

The Los Alamos Police Department (LAPD) may assume IC under unique circumstances, but usually has only minimal interaction with the Facility in an on-site emergency. This interaction normally involves traffic control on DOE roads with public access, handling criminal activity, and criminal investigations.

##### **D.1.7.2 Los Alamos County Emergency Management Coordinator**

Los Alamos County has an agreement with the Facility's SEO-3:EM to provide assistance in certain emergency situations. If an emergency occurs on Facility property that may affect the communities of Los Alamos and White Rock, SEO-3:EM personnel will notify the Los Alamos County Consolidated Dispatch Center which in turn will notify the Los Alamos County

Emergency Management Coordinator, who will coordinate necessary emergency actions throughout the county.

#### **D.1.7.3 Los Alamos Medical Center**

The Facility maintains a fully equipped decontamination room adjacent to the emergency room at LAMC. In the event that a case is sent to LAMC, support for the emergency room staff is provided by Facility occupational medical personnel. Radiation protection, industrial hygiene, and HAZMAT personnel also provide assistance to the emergency room staff; assistance from additional Facility resources is provided, as necessary. Assistance is coordinated through SEO-3:EM personnel.

### **D.2 EMERGENCY EQUIPMENT AND COMMUNICATIONS**

#### **D.2.1 Emergency Equipment**

The Permittees shall make available the lists of emergency equipment listed in Table D-1 for use at any of Permittees' hazardous or mixed waste management units. The list includes emergency equipment available in the HAZMAT vehicles and trailers as well as supplemental emergency equipment maintained by the LAFD, Maintenance Site Services, and occupational medicine personnel. A list of emergency equipment available for use at specific hazardous and/or mixed waste management units is identified in Attachment Tables TA-3, D-1; TA-50, D-1; TA-54, Area L, D-1; TA-54, Area G, D-2; TA-54 West, D-3; TA-55 Building 4 First Floor, D-1; TA-55 Building 4 Basement, D-2; TA-55 Container Storage Pad, D-3; TA-55 Building 185, D-4; and TA-63 Transuranic Waste Facility, D-5. Emergency equipment listed in these tables may be replaced and/or upgraded with functionally equivalent components and equipment, as necessary, for routine maintenance and repair.

#### **D.2.2 Emergency Communications**

The initial phase of an emergency may involve a small number of individuals at the affected area and that requires notification of the SEO-3:EM Duty Officer, utilizing local communication equipment and/or systems. When responding to hazardous and/or mixed waste emergencies, the Permittees shall ensure that SEO-3:EM personnel can provide communications between response units and emergency organizations.

##### **D.2.2.1 Fire Alarms**

Fire alarms are monitored 24 hours per day by trained personnel in the EOSC. Both the primary and backup buildings where the monitoring takes place have emergency power systems. The SEO-3:EM Duty Officer is notified when there is confirmed fire or smoke via the Los Alamos County Consolidated Dispatch Center.

### **D.2.2.2 Power Dispatch**

The Permittees shall maintain the Power Dispatch facility 24 hours a day. Alarms at this facility are connected to Facility experiments, equipment, and/or buildings to record outages and hazardous conditions. Any conditions that activate these alarms shall be reported immediately to the building management or to the Los Alamos County Consolidated Dispatch Center operator for notification and response.

### **D.2.2.3 Additional Communication Systems**

Internal communication systems at the Facility include:

1. Preprogrammed telephone system
2. Private telephone lines
3. A variety of frequency modulated very high frequency simplex repeater systems, including:
  - Multiple base stations
  - Mobile and hand-held units
  - Links to New Mexico public safety agencies
4. An ultrahigh frequency radio system, including:
  - Multiple antenna sites
  - Mobile and base units
  - Links with the LAPD, the LAFD, and the State Medical System
5. A 400-megahertz trunked radio system that includes a link with the LAFD
6. Transmission and reception (through the EOC) for:
  - Secure telephone
  - Secure fax
  - Secure still video
  - Secure videoconference system (to all DOE EOCs and DOE Headquarters)
7. Access to all radio systems outlined above (through the EOC).
8. Mass Notification System

2. Off-site communications with federal, state, tribal, county, and other agencies are available through the following:

1. A preprogrammed telephone system
2. Private telephone lines
3. Two NAWAS stations
4. Mass Notification System

3. The Permittees' EOC, maintained by SEO-3:EM personnel, operates radio systems on key Facility and off-site channels. Emergency personnel responding to on-site incidents have the benefit of wide-area radio coverage using EOC facilities. The SEO-3:EM Duty Officer is responsible for activating whatever support personnel, equipment, or services are needed 24 hours a day.

### **D.3 CONTINGENCY PLAN IMPLEMENTATION**

The following sections discuss requirements used to implement this Plan, emergency notification, SEO-3:EM Duty Officer activities and actions to be taken in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into the environment at the Facility.

#### **D.3.1 Requirements for Implementation**

1. The decision to implement this Plan depends upon whether an emergency exists, which for the purposes of this section is defined as an imminent or actual incident arising from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents that could threaten human health or the environment. The SEO-3:EM Duty Officer or IC will use the guidelines listed below to decide whether to implement this Plan. The Permittees shall investigate all adverse environmental, safety, health, and operational occurrences (on-site and off-site) resulting in implementation of the contingency plan to determine causal factors and identify the appropriate corrective actions.

2. This Plan shall be implemented immediately in the following situations involving releases or potential releases of hazardous or mixed waste:

1. Spills:
  - If a hazardous or mixed waste spill cannot be contained with secondary containment or application of sorbents
  - If a hazardous or mixed waste spill causes the release of flammable material, creating a fire or explosion hazard
  - If a hazardous or mixed waste spill results in toxic fumes that threaten human health
2. Explosions:
  - If an unplanned explosion involving hazardous or mixed waste occurs
  - If an imminent danger of an explosion involving hazardous or mixed waste exists.
3. Fires:
  - If a fire involving hazardous or mixed waste occurs
  - If any building, grass, forest, or nonhazardous waste fire exists that threatens to volatilize or ignite hazardous or mixed waste.
4. Other Acts of Force Majeure
  - If an earthquake or other natural disaster threatens containment integrity, including precipitation that threatens to move spilled material off site.

#### **D.3.2 Emergency Notification**

1. Emergency notification requires immediate notification of 667-6211 or SEO-3:EM personnel upon discovery of an imminent or actual incident involving hazardous and/or mixed waste. During nonworking hours, personnel will report all imminent or actual incidents involving hazardous and/or mixed waste to the Emergency Manager at 667-6211. In the case of fire, notification of these individuals is superseded by the Facility fire alarm system. A fire is reported by dialing 911, activating automatic alarms, or activating a fire alarm pull box. All fire



alarms alert EOSC who alerts the SEO-3:EM Duty Officer and the Los Alamos County Consolidated Dispatch Center, who contacts the LAFD.

2. Upon recognition of a hazardous or mixed waste emergency, the first arriving emergency-trained person will become the Facility Command Leader. Once SEO-3:EM personnel are notified of the emergency, the SEO-3:EM Duty Officer will proceed to the scene and be briefed by the Facility Command Leader, building/area personnel, and/or other emergency units/teams. The SEO-3:EM Duty Officer will then assume the position of IC. If necessary, the IC may recommend activation of the EOC and the emergency management team. The IC will assign ICS positions and update the EOSC and request necessary resources. The EOSC will notify the appropriate emergency response groups. The IC may determine from the list of response groups described in Attachment Sections D.1.2 through D.1.7 which groups to contact in an emergency. Each response group maintains an on-call person and/or a call-down procedure to respond to emergencies.

3. SEO-3:EM personnel shall be notified of any potential hazardous or mixed waste emergency. The IC will use whatever means are available (including the assistance of other response groups, computer data searches, and sampling) to determine if a hazardous or mixed waste emergency exists.

4. The Facility Emergency Manager or his or her designee shall make best efforts to timely communicate the nature of the emergency and the hazards that may be present to any outside response agency whose assistance may be required.

### **D.3.3 Emergency Manager Actions**

1. Upon notification of an emergency incident, the SEO-3:EM Duty Officer may:

1. Make an initial assessment of the incident and, in conjunction with the Facility Command Leader, obtain resources to determine the source, quantities, and types of hazardous and/or mixed waste involved and the areal extent of any released materials.
2. Request resources needed and have EOSC staff begin notifications.
3. Proceed directly to the scene.
4. Assess the nature of the incident (*e.g.*, through communication with the IC).
5. Assume incident command after a direct briefing with the Facility Command Leader.
6. Based on the guidelines in Attachment Section D.3.1 of this Plan, determine if implementation of this Plan is warranted.
7. Activate the EOC, if necessary.

2. Upon deciding to implement this Plan, the IC will, when appropriate:

1. Assess the hazards to human health and the environment, including both direct and indirect effects, such as generation of toxic, irritating, or asphyxiating gases and/or hazards of runoff of water or chemicals used for fire suppression. An individual designated by the IC will use the guidelines in Section D.3.1 to assess the hazards to human health and the environment. If any of the criteria under Section D.3.1 are met



and if the responsible Line Manager (or his/her designee) has not already accomplished evacuation of the area, the IC will initiate shelter in place or evacuation of the immediate area.

2. Direct the EOSC staff to initiate protective actions and immediately notify appropriate response groups and personnel as per the SEO-3:EM Guidelines. The Los Alamos County Emergency Coordinator may activate one or more of the following community alert mechanisms: reverse 911, the AM 1490 KRSN radio, or the cable television capture system, site wide area network radios, and public radio and television channels.
3. In the case of fire or release of any type, make reasonable efforts to confirm that all response personnel at the scene are aware of actual or imminent special hazards associated with hazardous or mixed waste.
4. In emergency situations, contact the appropriate ENV representative to notify the Department's Hazardous Waste Bureau and the National Response Center at (800) 424-8802, reporting:
  - The name and telephone number of the ENV representative
  - The name and address of the facility
  - The time and type of incident
  - The name and quantity of material involved, to the extent known
  - The extent of injuries, if any
  - The possible hazards to human health or the environment outside the facility.
5. When an emergency occurs at hazardous or mixed waste treatment units, ensure that appropriate Facility personnel monitor for leaks, pressure buildup, gas generation, or equipment ruptures.

3. Once control of the emergency is established, the IC will take all reasonable measures to minimize the occurrence, recurrence, or spread of fires, explosions, or releases. In addition, the IC will delegate cleanup and decontamination responsibilities to the Recovery Manager. These responsibilities may include:

1. Arranging for site cleanup.
2. Assisting with arrangements for proper handling of recovered waste, contaminated soil, or contaminated surface/groundwater.
3. Assisting with arrangements for decontamination of equipment, as needed.
4. Arranging for replacement and/or repair of equipment, as needed.
5. Requesting that testing is conducted to verify successful cleanup.

4. The Permittees shall report implementation of this Plan in accordance with Permit Sections 1.9.12, 1.9.13, and 2.11.6.3.

#### **D.4 SPILLS**

1. Sudden releases may include spills of hazardous or mixed waste that pose a significant threat to human health or the environment. Spill incidents resulting in a sudden release of hazardous or

explosion. Implementation of this Plan is required whenever there is an explosion at a permitted unit.

2. In the event of an explosion at the Facility, all personnel will immediately evacuate the area. Any injured personnel will be decontaminated at the site, if required and if time allows. An LAFD ambulance will transport these personnel to LAMC for treatment. If an injury is severe and requires immediate medical evacuation, the injured person will be wrapped to contain contamination, if necessary. In the case of an actual or potential explosion, on-site personnel will contact SEO-3:EM personnel immediately so that the Emergency Manager can ensure that all necessary emergency response personnel are alerted. The LAFD is notified automatically upon fire alarm activation. The Emergency Manager assumes incident command and will remain near but at a safe distance from the site in order to inform personnel responding to the explosion of the known hazards.

3. If a fire results from an explosion, the LAFD Senior Officer will, upon arrival at the scene, evaluate all available information and determine the appropriate firefighting methods and tactics. The LAFD Senior Officer will direct firefighting operations as the acting IC until SEO-3:EM formally assumes command.

#### **D.6 FIRE**

1. Fires and resultant releases of hazardous or mixed waste may result in a significant threat to human health or the environment. Implementation of this Plan is required whenever there is a fire at a permitted unit.

2. Fire alarms will be sounded automatically or manually to alert personnel that a fire hazard exists and to evacuate the area immediately if in the vicinity. Information related to the various fire alarms at the specific units is included in Attachment Tables TA-3, D-1; TA-50, D-1; TA-54, Area L, D-1; TA-54, Area G, D-2; TA-54 West, D-3; TA-55 Building 4 First Floor, D-1; TA-55 Building 4 Basement, D-2; TA-55 Container Storage Pad, D-3; TA-55 Building 185, D-4; and TA-63 Transuranic Waste Facility, D-5.

3. Depending on the size of the fire and the fuel source, portable fire extinguishers may be used. However, Facility policy does not encourage the use of portable fire extinguishers by employees unless they are properly trained. Instead, Facility policy encourages immediate evacuation of the area and notification of the Los Alamos County Emergency Coordinator by dialing 911. For any fire, including a fire that involves hazardous or mixed waste, the responsible Line Manager and SEO-3:EM personnel must be contacted immediately. The Emergency Manager will alert the LAFD and all other necessary emergency response personnel. If the fire spreads or increases in intensity, all personnel must follow protective actions as designated by the Emergency Manager. The Emergency Manager assumes incident command and will remain near the scene to advise personnel responding to the fire of the known hazards.

4. Upon arrival at the scene, the LAFD Senior Officer will evaluate all available information and determine the appropriate firefighting methods and tactics. The LAFD Senior Officer will direct

firefighting operations as the acting IC until the SEO-3:EM Duty Officer formally assumes command.

## **D.7 UNPLANNED NONSUDDEN RELEASES**

Nonsudden releases include those incidents that, if uncontrolled, impact the environment over a long period of time. Such incidents include minor leaks from containers and loss of secondary containment integrity.

### **D.7.1 Responsibility**

Appropriate Facility personnel are responsible for correction of a nonsudden release from a hazardous or mixed waste unit if the correction can be performed safely with normal maintenance and management procedures. Personnel from SEO-3:EM may provide assistance in mitigating releases. Any correction methods for nonsudden releases that have resulted in an impact to the environment will be coordinated with the Department.

### **D.7.2 Nonsudden Releases**

1. In general, the response to a nonsudden release will be to contain the release, to correct the cause of the release, and to clean up any release to a level that protects human health and the environment.
2. Appropriate Facility personnel shall conduct regularly scheduled inspections to detect failure of containment at the unit(s) addressed in this Permit. Secondary containment systems shall be inspected regularly to ensure that the integrity of the containment systems has not deteriorated. If an inspection reveals that containers are leaking or that secondary containment has deteriorated, Facility personnel shall ensure that maintenance or replacement of containment is performed, as appropriate. Inspections will be conducted in accordance with the facility's inspection plan.

### **D.7.3 Nonsudden Release Surveillance**

1. In addition to routine inspection and site-specific sampling and testing, the Permittees shall maintain an area-wide environmental monitoring network. Monitoring and sampling locations for various types of measurements are organized into three main groups. Regional monitoring stations located within the counties surrounding Los Alamos County are placed up to 80 kilometers (50 miles) from the Facility. These stations serve to determine background conditions. Perimeter stations are generally located within four kilometers (2.5 miles) of the Facility boundary and document conditions in residential areas surrounding the Facility. On-site stations, most of which are accessible only to employees during normal working hours, are within the Facility boundary.
2. Different types of surveillance sampling conducted at these stations include measuring radiation and collecting samples of air particulates, surface waters, groundwater, soil, sediment, and foodstuffs for subsequent analysis. Additional samples provide information about particular

events, such as major runoff events and nonroutine releases. Data from these efforts are used for comparison with standards, for determining background levels, and for radiation dose calculations.

## **D.8 EXPOSURE TO HAZARDOUS OR MIXED WASTE**

1. If a person is exposed to hazardous or mixed waste, the affected person, a co-worker, or line management will notify SEO-3:EM personnel. Appropriate first aid should be administered immediately. An SEO-3:EM representative will make appropriate notifications as soon as possible so that exposure levels and decontamination requirements can be established. The affected person will then be transported to the occupational medical facility or to LAMC for evaluation. If possible, the material involved in the exposure will be ascertained, and the information will be given to the medical staff.

2. Other potential exposures will necessitate evacuation of the area, if appropriate, or under any of the following conditions:

1. Irritation of the eyes, breathing passages, or skin
2. Difficulty in breathing
3. Nausea, lightheadedness, vertigo, or blurred vision.

3. The affected person will be transferred to the occupational medical facility or to LAMC if there is a serious injury. An industrial health and safety, radiation protection, or HAZMAT representative will attempt to ascertain what, if any, exposure occurred and what corrective measure is appropriate.

## **D.9 EVACUATION**

A permitted unit shall be evacuated upon the voice command to evacuate the area or upon the sounding of the evacuation or fire alarm. The IC may call for sheltering in place when evacuation is impractical due to significant airborne hazards. Shelter in place may be possible in a designated area or in a building where all exterior windows and doors may be closed and outdoor air ventilation equipment turned off. Once the airborne hazard has decreased, personnel would then be evacuated.

### **D.9.1 Emergency Process Shutdown Prior To Evacuation**

Personnel are instructed to shut down equipment prior to evacuating a building/area unless an immediate building/area evacuation is announced or signaled. To ensure efficient shutdown, training and exercises addressing the shutdown process are performed. In the case of an immediate evacuation, a selected team may shut down designated equipment in an evacuated area upon approval of command. The team will be equipped with proper equipment and PPE. If they are on location, radiation protection, industrial health and safety, and/or HAZMAT personnel will provide advice and assistance.

### **D.9.2 Evacuation Plan**

1. Emergency situations may warrant the shutdown and evacuation of areas or buildings in order to protect personnel and property, to anticipate the emergency condition, or to enhance the appropriate response. Attachment Table D-3 lists the criteria for evacuation, persons responsible for initiating evacuations, and reentry conditions.
2. To initiate the evacuation of a building/area, the evacuation or fire alarm is sounded and/or the public address (PA) system may be used. Evacuation alarms cannot be silenced and reset by site personnel. Only the Fire Alarm Maintenance Section and the LAFD Battalion Chief can silence and reset alarms. To evacuate a portion of a building or area, use of the PA system may be more appropriate. The PA system will notify the occupants of the area to be evacuated and will advise personnel throughout the building of the existence of a problem in a specific area. Once evacuation has been initiated and if conditions allow, personnel will turn off all equipment that could contribute to the hazard if left unattended. All personnel will then proceed from the affected area to the assembly/muster area.
3. In the event of evacuation of a building, an outbuilding, or an outlying work area, the responsible Line Manager (or his/her designee) will determine a control point at the closest safe location (*e.g.*, considering wind direction). The designated area will be outside the affected area and will serve as an assembly/muster area where the Line Manager (or designee) can oversee evacuation operations and work to prevent further spread of the hazard.
4. As personnel exit an affected building/area, a primary sweep of the building/area may be performed to ensure that all personnel have evacuated. If the building/area is evacuated, a Group Leader designee will take attendance at the assembly/muster area and report personnel accountability to the IC. The evacuation procedure is as follows:
  1. The person discovering the accident or emergency will call 911 if the event is life-threatening or LAFD is required, or 667-6211 for all other evacuations. The person will then notify line management.
  2. Site-specific BEPs and/or emergency action procedures will be followed concerning evacuation, sweep, personnel accountability, and equipment shutdown procedures.
5. A responsible on-site person may direct the initial evacuation and the fire alarm system may be activated. SEO-3:EM personnel will be notified and dispatched immediately. A responsible on-site person may implement and direct the evacuation process until the SEO-3:EM Duty Officer or LAFD arrives at the scene to assume that responsibility.

### **D.10 SALVAGE AND CLEANUP**

1. Appropriate representatives from the ENV groups will survey the affected area before salvage and cleanup begin. They will conduct visual inspections and sampling, as appropriate, of the affected area to determine whether cleanup is complete. If gases or fumes, electrical or radiological problems, or other conditions present a hazardous situation, personnel or selected teams equipped with proper PPE will reenter the area to perform designated decontamination



2. There is change in the design or operation of the facility (e.g., quantities of waste handled and handling techniques) that increases the likelihood of an emergency and requires changes in emergency response;
3. The Primary Emergency Manager changes; and
4. The list of emergency equipment changes significantly.

#### D.13 REFERENCES

EPA, 1986 and all approved updates, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," *EPA-SW-846*, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, U.S. Government Printing Office, Washington, D.C.

LANL, 2014<sup>3</sup>. *The Los Alamos National Laboratory and Los Alamos Field Office Hazardous Material Program Emergency EO-DO-PLAN-100; 2010; LANL Emergency Procedures and Protective Actions, P1201-4, R2*. Los Alamos National Laboratory, Security and Emergency Operations Division, Los Alamos, New Mexico

LANL, 2002, "Los Alamos National Laboratory General Part B Permit Renewal Application", Revision 2.0, August 2002, LA-UR-03-5923, Los Alamos National Laboratory, Los Alamos, New Mexico.

**Table D-1**

**Los Alamos National Laboratory-Wide Emergency Equipment  
Hazardous Materials (HAZMAT) Vehicles and Associated Emergency Equipment**

---

HAZMAT vehicles and trailers are located at Technical Area (TA) 64, Building 39 (TA-64-39). They are available to the **Security and** Emergency Operations Division's Emergency Response Group (**SEO-1:ER**) for emergency response to all of the TAs at the Facility. **SEO-1:ER** is responsible for maintaining the supplies of appropriate emergency equipment in each vehicle and trailer.

The HAZMAT vehicles and trailers are equipped with safety and emergency equipment, personal protective clothing, and other supplies, which may include, but are not limited to, some or all of the following:

- Assorted personal protective equipment, T-shirts, and gloves
- Safety goggles, safety glasses, and face shields
- Boots and booties
- Totally encapsulating suits and boots
- Level A and B suits
- Flash suits
- Self-contained breathing apparatus (SCBA) and SCBA bottles
- Respirators and cartridges
- Hazardous chemical reference books and other reference materials
- Shovels
- Siphon pumps
- Assorted spill kits and sorbents
- Neutralizing solutions: acids, bases, and caustics
- Two-way radios, cellular phones, facsimile, and other communication equipment
- Bottles of leak detector and leak repair kits
- Emergency repair packs
- HAZMAT bags
- Gas detectors and chemical monitoring equipment
- Radiological monitoring equipment
- Sponges and cleaners
- Warning signs and barricade tape
- Traffic control barriers
- Flashlights
- Cameras and film
- Knives
- Portable power supplies
- Warning and signal horns
- Harnesses and belts

**Table D-3**  
**Evacuation Determination and Re-Entry Conditions**

<b>Reason for Evacuation</b>	<b>Evacuation Determination Made by</b>	<b>Reentry Conditions<sup>a</sup></b>
Fire	<sup>1</sup> Fire or evacuation alarm, Line Manager or alternate, Lead Engineer, Senior Staff Member present, Senior Technician, or Emergency Manager	Following survey by the person designated by the IC <sup>b</sup>
Explosion	Same as 1 above	Same as above
Loss of ventilation	<sup>2</sup> Line Manager or alternate, Senior Staff Member, Lead Engineer, or Senior Technician, or Emergency Manager	Same as above
Loss of electric power	Same as 2 above	Same as above
Extensive contamination	Same as 2 above or health physics representative	Same as above
Airborne contamination	Same as 2 above or Radiation Monitor	Same as above
Escape or release of toxic or hazardous gas or fumes	Line Manager or alternate, Senior Staff Member, Lead Engineer, Senior Technician, or Emergency Manager	Same as above
Bomb or bomb threat	SEO-3:EM <sup>c</sup> or security personnel, R&D <sup>d</sup> Section Leader or alternate, Senior Staff Member, or Lead Engineer	Same as above

- <sup>a</sup> All reentries are authorized by the SEO-3:EM Incident Commander.
- <sup>b</sup> "IC" refers to the Incident Commander as defined in 29 CFR § 1910.120.
- <sup>c</sup> "EO-EM" refers to the Emergency Management Group.
- <sup>d</sup> "R&D" refers to the Research and Development Section

TA-3  
ATTACHMENT D  
CONTINGENCY PLAN

The Contingency Plan is a document that describes the actions to be taken in the event of an emergency. It is a key component of the overall environmental management system and is intended to ensure that the facility is prepared to respond to any emergency situation.

The Contingency Plan is developed in accordance with the requirements of the RCRA and CERCLA. It is a living document that is updated as needed to reflect changes in the facility's operations, equipment, and personnel. The Contingency Plan is a key component of the overall environmental management system and is intended to ensure that the facility is prepared to respond to any emergency situation.

The Contingency Plan is developed in accordance with the requirements of the RCRA and CERCLA. It is a living document that is updated as needed to reflect changes in the facility's operations, equipment, and personnel. The Contingency Plan is a key component of the overall environmental management system and is intended to ensure that the facility is prepared to respond to any emergency situation.

**TA-3**

**ATTACHMENT D**

**CONTINGENCY PLAN**

The Contingency Plan is a document that describes the actions to be taken in the event of an emergency. It is a key component of the overall environmental management system and is intended to ensure that the facility is prepared to respond to any emergency situation. The Contingency Plan is developed in accordance with the requirements of the RCRA and CERCLA. It is a living document that is updated as needed to reflect changes in the facility's operations, equipment, and personnel. The Contingency Plan is a key component of the overall environmental management system and is intended to ensure that the facility is prepared to respond to any emergency situation.

**TA-50**  
**ATTACHMENT D**  
**CONTINGENCY PLAN**

Specific information on emergency response resources and release prevention/mitigation at TA-50 is provided below.

Emergency equipment currently available for use at the permitted units at TA-50-69 are included in Table D-1 below. A list of emergency equipment (including spill equipment) available from the SEO-3:EM and SEO-1:ER is presented in Table D-1 in this Attachment.

Hazardous and mixed waste spills are managed by type and severity of the incident. If a hazardous/mixed waste spill occurs, the Incident Commander evaluates the type and severity of the spill and determines if assistance from SEO-3:EM personnel is required. If not, the spill is managed internally by TA-50 personnel.

**REFERENCES**

LANL, 1998, "Los Alamos National Laboratory General Part B Permit Application," Revision 1.0, Los Alamos National Laboratory, Los Alamos, New Mexico.

LANL, 2002, "Los Alamos National Laboratory Technical Area 50 Part B Permit Renewal Application", Revision 3.0, August 2002, LA-UR-02-4739, Los Alamos National Laboratory, Los Alamos, New Mexico



## **SPILL CONTROL EQUIPMENT**

- **SPILL CONTROL EQUIPMENT**

Description of General Capabilities

The spill control kits may contain items such as absorbents (*i.e.*, pillows and pigs) or weighted tarps. The SEO-3:EM or SEO-1:ER provides additional spill control and clean up equipment as needed.

Spill Control Kit Location

The spill kits are located in TA-50-69 and at the TA-50-69 Outdoor Unit

## **COMMUNICATION EQUIPMENT**

Description of General Capabilities

Telephones for internal and external communication are available for use by employees. Alphanumeric pagers or cellular phones with page/text capabilities are also utilized by employees. Employees can be notified of an emergency situation and appropriate response actions through the use of a text message sent to the pagers, phones, or via two-way radios that may also be utilized for communication. Employees can reach emergency personnel in the time of an emergency through cellular telephones and two-way radios. Fire alarms are activated in the event of a fire. The fire alarm is a double slow whoop sound. When working at the permitted units, personnel will have immediate access to emergency communication equipment either directly or through visual or voice contact with another employee.

Location of Communication Equipment

Personnel working at the permitted units at TA-50-69, will carry cellular phones, pagers, or two-way radios, or will have immediate access to communication equipment through visual or voice contact with another employee.

## **DECONTAMINATION EQUIPMENT**

- **SAFETY SHOWERS**

Description of General Capabilities

Safety showers are available to personnel who receive a chemical splash to the skin.

Location of Safety Showers

A safety shower is located in TA-50-69, Room 102. One standard shower is located adjacent to the change room in TA-50-69.

- **EYEWASHES**

Description of General Capabilities

Eyewashes are available to personnel who receive a chemical splash to the eye(s). Specific SDSs for the chemicals being managed are available hard copy or via online

**TA-55**  
**ATTACHMENT D**  
**CONTINGENCY PLAN**

Specific information on emergency response resources and release prevention/mitigation at TA-55 is provided below.

Emergency equipment currently available for use at TA-55 are included as Tables D-1 through D-4 in this Attachment. A list of emergency equipment (including spill control equipment) available from the TA-55 Emergency Management Team is presented in Table D-1 of this Attachment's General Section. Emergency equipment discussed in this Plan may be replaced and/or upgraded with functionally equivalent components and equipment as necessary for routine maintenance and repairs.

Hazardous waste spills are managed by type and severity of the incident. If a hazardous waste spill occurs, the facility line management evaluates the type and severity of the spill and determines if assistance from SEO-3:EM and the SEO-3:EM Duty Officer is required. If not, the spill is managed internally by TA-55 personnel.

**REFERENCES**

LANL, 2002, "Los Alamos National Laboratory General Part B Permit Renewal Application", Revision 2.0, August 2002, LA-UR-03-5923, Los Alamos National Laboratory, Los Alamos, New Mexico

LANL, 2003, "Los Alamos National Laboratory Technical Area 54 Part B Permit Renewal Application", Revision 3.0, June 2003, LA-UR-03-3579, Los Alamos National Laboratory, Los Alamos, New Mexico

The continuous air monitor alarm is a local high-pitched pulsating tone.

The ventilation alarm is a local slow, repeating chime tone.

The public address system may also be used to announce an evacuation.

### **DECONTAMINATION EQUIPMENT**

Safety showers and eyewash stations are located in Room 401.

#### **Description of General Capabilities:**

Safety showers and eyewashes are available for decontamination of personnel who receive a chemical splash to the skin or eyes.

Electronic versions of Safety Data Sheets (SDSs) are available in Room 401 and at TA-55-4, the TA-55 Operations Center located at TA-55, Building 0004, Room 218, for personnel working in Room 401.

Specific SDSs may be obtained prior to working with any hazardous waste to determine if the application of water is indicated for decontamination.

### **PERSONAL PROTECTIVE EQUIPMENT**

Self-contained breathing apparatus (SCBA) are located in the southside hallway outside of Room 401, in the northside hallway of TA-55-4, and in TA-55-3, Room 179. The SCBAs are available for personnel working in or near Room 401.

Change/decontamination rooms with protective clothing available are located on the first floor of TA-55-4 and in TA-55-3. Protective clothing is also available in a locker located in the hallway near Room 401 for use by personnel working in or near Room 401.

Respirators located in TA-55-3 (Room 107) and in TA-55-4 (Room 515) are available for all personnel working in or near TA-55-4. Respirators are re-issued on a regular basis to TA-55-4 personnel for radiation work. These respirators are stored in the personnel's individual lockers. Combination gas canisters (particulate, organic, and acid) are available in TA-55-4 (Room 515).

#### **OTHER:**

If transportation is needed for evacuation, vehicles may be obtained through the SEO-3:EM or SEO-1:ER.

The evacuation alarm is a facility-wide mid-range pulsating tone.

The continuous air monitor alarm is a local high-pitched pulsating tone.

The ventilation alarm is a local slow, repeating chime tone.

The public address system activated from the TA-55-4 Operations Center may be used to announce an evacuation.

A site-wide paging system activated from the TA-55-4 Operations Center can be heard throughout TA-55-4.

### **DECONTAMINATION EQUIPMENT**

Eyewashes are located throughout the basement of TA-55-4.

#### **Description of General Capabilities:**

The eyewash stations are available for decontamination of personnel who receive a chemical splash to the eyes.

Safety showers are located near B40, K13 and in the office for the Vault.

#### **Description of General Capabilities:**

The safety showers are available for decontamination of personnel who receive a chemical splash to the skin.

Safety Data Sheets (SDSs) are available at TA-55-4. Specific SDSs may be obtained prior to working with any hazardous waste to determine if the application of water is indicated for decontamination.

### **PERSONAL PROTECTIVE EQUIPMENT**

Change/decontamination rooms with protective clothing available are located on the first floor of TA-55-4 and in TA-55-3.

Respirators located in TA-55-4 and in TA-55-3 are available for all personnel working in or near TA-55-4. Particulate and toxic gas canisters are available in TA-55-4.

Self-contained breathing apparatus are located in the TA-55, Basement.

### **OTHER:**

If transportation is needed for evacuation, vehicles may be obtained through the SEO-3:EM or SEO-1:ER.

Forklifts stored in the basement are available for use in the basement and are stored near the north basement doorway.



**Description of General Capabilities:**

The safety shower and eyewash are available for personnel who receive a chemical splash to the skin or eyes.

Safety Data Sheets (SDSs) are available at TA-55-2. Specific SDSs may be obtained prior to working with any hazardous waste to determine if the application of water is indicated for decontamination.

**PERSONAL PROTECTIVE EQUIPMENT**

Change rooms with protective clothing available are located on the first floor of TA-55-4 and in TA-55-3.

Respirators are located in TA-55-4 and in TA-55-3 for all personnel working in or near TA-55-4.

**OTHER:**

If transportation is needed for evacuation, vehicles may be obtained through SEO-3:1EM or SEO-1:ER. Two forklifts are available for NPI-7 use.

**TABLE D-4**  
**TA-55 BUILDING 185**  
**Emergency Equipment**

---

**FIRE CONTROL EQUIPMENT:**

Fire hydrants are located along the north, south, and west sides of TA-55, Building 4 (TA-55-4).

One fire alarm pull box is located inside TA-55-185.

Fire alarm pull boxes are located in TA-55, Building 42, at the northwest corner of TA-55-4.

One fire alarm pull box is located outside on the south side of TA-55-4.

**COMMUNICATION EQUIPMENT:**

One telephone is located inside TA-55-185.

A telephone is located on the east side of TA-55-11 and additional phones are located in TA-55-185 and on the south side of TA-55-4.

Two-way radios are available from the TA-55 Operations Center located at TA-55, Building 0004, and Room 218 for personnel working at TA-55-185.

Personal pagers are issued to and carried by assigned personnel working at TA-55-185. These pagers are accessed by telephone.

Alarms at TA-55-4:

The fire alarm is an area-wide whooping sound.

The evacuation alarm is a facility-wide mid-range pulsating tone.

The public address (PA) system activated from the TA-55-4 Operations Center may be used to announce an evacuation.

PA speakers are located on the west side of TA-55-4 near TA-55-185. Intercom systems to the TA-55-4 Operations Center are located on the south and north sides of TA-55-4.

**DECONTAMINATION EQUIPMENT:**

TA-55-185 will be equipped with a portable safety shower and eyewash station before wastes are managed there.

**PERSONAL PROTECTIVE EQUIPMENT:**

Change rooms with protective clothing available are located in TA-55-3.

Respirators located in TA-55-4 and in TA-55-3 are available for all personnel working in or near TA-55-185.

**OTHER:**

If transportation is needed for evacuation, vehicles may be obtained through SEO-3:EM or SEO-1:ER.

A forklift, pallet jack or drum handler is available inside of TA-55-185.

Two forklifts are available to NPI-7.

## **PART 2: GENERAL FACILITY CONDITIONS**

### **2.1 DESIGN, CONSTRUCTION, MAINTENANCE, AND OPERATION OF THE FACILITY**

The Permittees shall design, construct, maintain, and operate the Facility to minimize the possibility of fire, explosion, or any unplanned, sudden, or non-sudden release of hazardous waste or hazardous constituents to air, soil, groundwater, or surface water that could threaten human health or the environment (*see* 40 CFR § 264.31).

### **2.2 AUTHORIZED WASTES**

The Permittees shall accept, store, treat, or otherwise manage at permitted units at the Facility only those hazardous wastes the Permittees proposed to manage at the units in the Permit Application, which are those wastes bearing the EPA Hazardous Waste Numbers (*i.e.*, waste codes) listed in Attachment B (*Part A Application*), unless otherwise prohibited by this Permit.

#### **2.2.1 Hazardous Waste from Off-Site Sources**

The Permittees may accept, store, treat or otherwise manage at permitted units at the Facility only the following hazardous wastes from off-site sources:

- (1) Treatment-derived waste or residues from wastes generated at the Facility, sent off site for treatment at a facility referenced in Attachment L (*Listing of Off-Site Facilities*), and subsequently returned to the Facility prior to final disposition off-site. Such wastes or waste residues may be managed at the Facility only subject to the following conditions:
  - a. for wastes with no available site for final disposal, the Permittees shall provide written notice to the Department that there is no available site for final disposal within five days of receipt of treatment-derived waste or waste residues at the Facility; or
  - b. for wastes with an available final disposal path, the Permittees shall store the wastes for no more than 60 days and shall ship the wastes off site.

Requests to modify of the list of Attachment L (*Listing of Off-Site Facilities*) shall be Class 1 permit modification requests.

The Permittees shall provide e-mail notification pursuant to Permit Section 1.13 of the written notice under Permit Section 2.2.1(1)a.

- (2) Hazardous waste generated by the Permittees at TA-57 (the Fenton Hill site);



- (3) define the nature and extent of the spilled waste;
- (4) package the spilled waste and contaminated materials in containers; and
- (5) decontaminate the area, all clean-up equipment, and personnel.

### **2.10.5 Arrangements with Local Authorities**

The Permittees shall maintain its preparedness and prevention agreement with the Los Alamos County Emergency Services Division and support agreements with the Los Alamos Fire Department, the Los Alamos Police Department, and the Los Alamos Medical Center (*see* 40 CFR § 264.37).

The Permittees shall provide the Chief of the Los Alamos Fire Department (LAFD) with information that would ensure that emergency response personnel are at all times familiar with the potential hazards in performing their duties associated with the hazardous wastes at LANL's permitted hazardous waste management units. This information shall be specific to each permitted unit and at a minimum include:

- (1) Waste types, *e.g.*, ignitable, reactive, corrosive;
- (2) Waste names that identify principle hazardous chemical constituents;
- (3) Approximate quantities of each waste type; and
- (4) General location of waste types.

The Permittees' Security and Emergency Management Group Operations Division Leader and Security and Emergency Planning and Preparedness Team Leader Operations-3: Emergency Management Group Leader shall annually sign a certification stating that the LAFD has been provided with this information to the satisfaction of the Chief of the LAFD. These certification statements shall be maintained in the Facility Operating Record.

## **2.11 CONTINGENCY PLAN**

### **2.11.1 Implementation of Contingency Plan**

The Permittees shall immediately implement Attachment D (*Contingency Plan*) whenever there is an incident (such as a fire, an explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents) at a permitted unit that threatens human health or the environment (*see* 40 CFR § 264.51(b)).

The Contingency Plan shall be implemented immediately and without consideration to potential threat to human health and the environment if any of the following hazards occur at a permitted unit:

# **ENCLOSURE 2**

## **Certification**

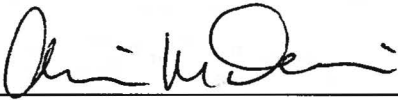
ENV-DO-14-0234

LA-UR-26586

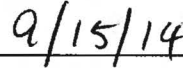
Date: SEP 22 2014

### CERTIFICATION


I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



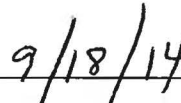
**Alison M. Dorries**  
Division Leader  
Environmental Protection Division  
Los Alamos National Laboratory  
Operator



**Date Signed**



**Kimberly Davis Lehak**  
Manager, Los Alamos Field Office  
National Nuclear Security Administration  
U.S. Department of Energy  
Owner/Operator



**Date Signed**