



ESHID-602362

Environmental Protection & Compliance Division
Los Alamos National Laboratory
PO Box 1663, K491
Los Alamos, New Mexico 87545
(505) 667-2211

National Nuclear Security Administration
Los Alamos Field Office
3747 West Jemez Road, A316
Los Alamos, New Mexico, 87544
(505) 665-7314/Fax (505) 667-5948

Date: **MAY 12 2017**
Symbol: EPC-DO: 17-145
LA-UR: 17-22808
Locates Action No.: N/A

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

Subject: Notification of a Class 1 Permit Modification to Update and Provide Clarification to Attachment D of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit

Mr. Kieling,

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 (Permit) EPA ID# NM0890010515 issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), collectively the Permittees, in November 2010. This permit modification provides revisions to Permit Attachment D, *Contingency Plan*.

The proposed modifications have been prepared in accordance with the Code of Federal Regulations [CFR], Title 40 (40 CFR) § 270.42(a). This permit modification was determined to be a Class 1, consistent with 40 CFR § 270.42, Appendix I, Items A.1 and B.6.d.


Included with this permit modification package is this transmittal letter and an enclosure that contains a description of changes and pages of the revised portions of Attachment D (LA-UR-22808). Accordingly, a signed certification page has also been included.

Included herein are three hard copies and one electronic copy of this submittal. The hardcopy submittal includes pages or sections where text has been changed, rather than copies of the entire collection of Permit attachments. The electronic copy, provided only to the New Mexico Environment Department Hazardous Waste Bureau, includes a reproduction of the hardcopy in portable document format (PDF) and 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.

If you have comments or questions regarding this permit modification, please contact Karen Armijo (DOE) at (505) 665-7314 or Mark Haagenstad (LANS) at (505) 665-2014.

Sincerely,


John C. Bretzke
Division Leader

Sincerely,


Karen E. Armijo
Permitting and Compliance Program Manager

JCB:KEA:FN/eim/am

Enclosure 1: Class 1 Permit Modification to Update and Provide Clarification to Attachment D of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit

Copy: Laurie King, USEPA/Region 6, Dallas, TX (E-File)
Dave Cobrain, NMED/HWB, Santa Fe, NM, (E-File)
Neelam Dhawan, NMED-HWB, Santa Fe, NM, (E-File)
Siona Briley, NMED-HWB, Santa Fe, NM (E-File)
Karen E. Armijo, NA-LA, (E-File)
Kirsten M. Laskey, EM-LA, (E-File)
Jody Pugh, NA-LA, (E-File)
David J. Nickless, EM-LA, (E-File)
Craig S. Leasure, PADOPS, (E-File)
William R. Mairson, PADOPS, (E-File)
Michael T. Brandt, ADESH, (E-File)
Raeanna Sharp-Geiger, ADESH, (E-File)
Craig S. Leasure, PADOPS, (E-File)
William R. Mairson, PADOPS, (E-File)
Michael T. Brandt, ADESH, (E-File)
Raeanna Sharp-Geiger, ADESH, (E-File)
David J. Funk, ADEM, (E-File)
John P. McCann, EPC-DO, (E-File)
Mark P. Haagenstad, EPC-CP, (E-File)
Luciana Vigil-Holterman, EPC-CP, (E-File)
Felicia D. Naranjo, EPC-CP, (E-File)
Ellena I. Martinez, EPC-CP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
locatsteam@lanl.gov, (E-File)

Mr. John E. Kieling
EPC-DO: 17-145

- 3 -

epc-correspondence@lanl.gov, (E-File)
adesh-records@lanl.gov, (E-File)
rcra-prr@lanl.gov, (E-File)



COPY



Environmental Protection & Compliance Division
Los Alamos National Laboratory
PO Box 1663, K491
Los Alamos, New Mexico 87545
(505) 667-2211

National Nuclear Security Administration
Los Alamos Field Office
3747 West Jemez Road, A316
Los Alamos, New Mexico, 87544
(505) 665-7314/Fax (505) 667-5948

Date: MAY 12 2017
Symbol: EPC-DO: 17-145
LA-UR: 17-22808
Locates Action No.: N/A

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



Subject: Notification of a Class 1 Permit Modification to Update and Provide Clarification to Attachment D of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit

Mr. Kieling,

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 (Permit) EPA ID# NM0890010515 issued to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS), collectively the Permittees, in November 2010. This permit modification provides revisions to Permit Attachment D, Contingency Plan.

The proposed modifications have been prepared in accordance with the Code of Federal Regulations [CFR], Title 40 (40 CFR) § 270.42(a). This permit modification was determined to be a Class 1, consistent with 40 CFR § 270.42, Appendix I, Items A.1 and B.6.d.

Included with this permit modification package is this transmittal letter and an enclosure that contains a description of changes and pages of the revised portions of Attachment D (LA-UR-22808). Accordingly, a signed certification page has also been included.

Included herein are three hard copies and one electronic copy of this submittal. The hardcopy submittal includes pages or sections where text has been changed, rather than copies of the entire collection of Permit attachments. The electronic copy, provided only to the New Mexico Environment Department Hazardous Waste Bureau, includes a reproduction of the hardcopy in portable document format (PDF) and the word processing files used to create the hardcopy.

ENCLOSURE 1

Class 1 Permit Modification to Update and Provide
Clarification to Attachment D of the Los Alamos National
Laboratory (LANL) Hazardous Waste Facility Permit

EPC-DO:17-145

LA-UR-17-22808

Date: MAY 12 2017

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 underlined, red text for additions and redline strikeout for deletions.

DESCRIPTION

Attachment 1 of this modification provides updates to Sections D.1.1, D.1.3, D.2.2.3, D.3.2, D.3.3, D.5, and D.6 of Attachment D, *Contingency Plan*. A certification page in accordance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR) § 270.11 is included in Attachment 2.

Permit Section D.1.1

Permit Section D.1.1 has been updated to include the name, address, and telephone numbers for an additional Alternate Emergency Manager. The order in which the telephone numbers are listed for the Primary and Alternate Emergency Managers was also changed to reflect the order in which they prefer to be contacted: 1) Work, 2) Cell, and 3) Home.

Additionally, Permit Section D.1.1 was revised to correct a misleading statement. Paragraph 4 of Permit Section D.1.1 originally read as follows:

D.1.1 Emergency Operations-Emergency Management Group

4. ...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-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.

The intent of this section is to communicate that emergency response personnel shall have access to various tools and information during an emergency response. Although this information is available and accessible at the Emergency Operation Center (EOC), it is not maintained by EOC personnel. Language in paragraph 4 of Section D.1.1 was revised for clarification, and now reads:

D.1.1 Emergency Operations-Emergency Management Group

4. ... *These tools shall be available to the SEO-EM Duty Officer and other emergency response organization members at the EOC. Additionally, this information may be gained from the facility manager where a waste management unit is located. The various response groups may 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.*

Permit Section D.1.3

Permit Section D.1.3 has been updated to reflect an organizational structure change. Originally, Permit Section D.1.3 was titled and read as follows:

D.1.3 Environmental Protection and Compliance Division and Waste Management Division Response

At the scene, representatives and technical advisors from the Environmental Protection Division and Compliance (EPC), Waste Management Division (WM), and other response personnel are coordinated by the IC.

Recently, the LANL Associate Directorate of Environmental Safety and Health underwent a structural re-organization that merged the Environmental Protection and Compliance Division and the Waste Management Division. As of March 20th, 2017 the two groups that made up the Waste Management Division will report into the Environmental Protection and Compliance Division. As a result of this organization structure change, the title and language from Permit Section D.1.3 has been revised to the following:

D.1.3 Environmental Protection and Compliance Division Response

At the scene, representatives and technical advisors from the Environmental Protection and Compliance Division (EPC) and other response personnel are coordinated by the IC.

The title of the section was also changed in the table of contents.

Permit Section D.2.2.3

Permit Section D.2.2.3 (*Additional Communication Systems*) was updated to delete a reference to the two National Warning System (NAWAS) stations, which were listed as an available method for off-site communications with federal, state, tribal, county, and other agencies. This mode of communication is outdated and is no longer supported. The three additional methods of off-site communication that are listed in Section D.2.2.3 are more modern and capable of disseminating information during an emergency.

Permit Section D.3.2

Permit Section D.3.2 (*Emergency Notification*) was revised to clarify language relating to emergency notifications. Originally, the last sentence of paragraph 1 stated: “*All fire alarms alert EOSC who alerts the SEO-EM Duty Officer and the Los Alamos County Consolidated Dispatch Center, who contacts the LAFD.*” The language was revised to clarify that the Emergency Operations and Support Center (EOSC) will only contact the Los Alamos County Consolidated Dispatch Center when the situation warrants an emergency response from the Los Alamos Fire Department. The language has been revised and now reads as follows: “*All fire alarms alert EOSC. The EOSC alerts the SEO-EM Duty Officer and, if warranted, the Los Alamos County Consolidated Dispatch Center, who then dispatches the LAFD.*”

Permit Section D.3.3

Language was added to line item 1.3 of Permit Section D.3.3 (*Emergency Manager Actions*), which previously stated: “*Proceed directly to the scene,*” so that it now reads “*Proceed directly to the scene, if safe to do so.*” The objective of this added language is to ensure, as far as practicable, the safety, health, and well-being of emergency responders during emergencies.

Permit Section D.5 and D.6

Language in Permit Sections D.5 (*Explosion*) and D.6 (*Fire*) was revised to clarify the role of the Los Alamos Fire Department (LAFD) during an emergency response. Originally, Permit Sections D.5 and D.6 read as follows:

D.5 EXPLOSION

3. ... *The LAFD Senior Officer will direct firefighting operations as the acting IC until SEO-EM formally assumes command.*

D.6 FIRE

4. ... *The LAFD Senior Officer will direct firefighting operations as the acting IC until the SEO-EM Duty Officer formally assumes command or enters unified command.*

The intent of these statements was to specify that when there is more than one agency with incident jurisdiction, agencies may enter a unified command to establish a common set of objectives and strategies. It was not the intent of this language to imply that the Security and Emergency Operations - Emergency Management Group (SEO-EM) will assume control of, or direct, the Los Alamos Fire Department’s firefighting operations. During an emergency response, the LAFD will direct all firefighting operations and may work together with the SEO-EM and other agencies to create a unified command structure. The LAFD will not assume the responsibility, or work in the capacity, of acting Incident Commander.

Language in Permit Sections D.5 and D.6 was revised for clarification, and now reads as follows:

D.5 EXPLOSION

3. ...*The LAFD Senior Officer will direct firefighting operations and will, if applicable, enter a unified command, with the SEO-EM and other agencies, to coordinate an effective response while at the same time carrying out their own jurisdictional responsibilities.*

D.6 FIRE

4. ...*The LAFD Senior Officer will direct firefighting operations and will, if applicable, enter a unified command, with SEO-EM and other agencies, to coordinate an effective response while at the same time carrying out their own jurisdictional responsibilities.*

Basis

This permit modification incorporates updated information that meets the conditions for Class 1 permit modifications without prior approval listed within Appendix I of 40 CFR §270.42 and has been drafted in accordance with 40 CFR § 270.42 (a)(1). Attachment D, *Contingency Plan*, requires updates that meet the conditions specified in 40 CFR §270.42, Appendix I, Item B.6.d – changes in name of coordinators or other persons or agencies identified in the plan. Additional changes to Permit Attachment D include administrative and information changes that meet the conditions specified in 40 CFR §270.42, Appendix I, Item A.1.

Attachment 1

Attachment D - Revised Permit Text

ATTACHMENT D
CONTINGENCY PLAN

TABLE OF CONTENTS

LIST OF TABLES	4
LIST OF FIGURES	5
GENERAL CONTINGENCY PLAN.....	6
D.1 HAZARDOUS AND MIXED WASTE EMERGENCY RESPONSE RESOURCES	6
D.1.1 Emergency Operations-Emergency Management Group	7
D.1.2 Hazardous Materials Response	10
D.1.3 Environmental Protection and Compliance Division and Waste Management Division Response	10
D.1.3.1 Ecology Personnel	10
D.1.3.2 Meteorology and Air Quality Personnel	10
D.1.3.3 Hazardous Waste Compliance Personnel	11
D.1.3.4 Water Quality and Hydrology Personnel	11
D.1.4 Other Facility Response Resources	11
D.1.5 Contracted Response.....	11
D.1.5.1 Security Services	11
D.1.5.2 Maintenance Site Services	11
D.1.5.3 Los Alamos Fire Department	12
D.1.6 Facility Support.....	12
D.1.6.1 Health Physics Operations	12
D.1.6.2 Occupational Medicine Personnel	12
D.1.6.3 Industrial Hygiene and Safety Personnel	12
D.1.6.4 Performance Assurance Office	12
D.1.7 Outside Response Agencies	13
D.1.7.1 Los Alamos Police Department	13
D.1.7.2 Los Alamos County Emergency Management Coordinator	13
D.1.7.3 Los Alamos Medical Center	13

4. The IC (*e.g.*, SEO-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-EM. SEO Division personnel shall coordinate and issue the Facility's Los Alamos National Laboratory and Los Alamos Field Office Hazardous Materials Program Plan; SEO-EM provides response coordination for emergencies. SEO-EM provides a 24-hour 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-EM Duty Officer) is the functional equivalent of the Emergency Coordinator (40 CFR § 264.55). The SEO-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 EOSC.

2. Assignment as the SEO-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-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-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-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-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 available to the SEO-EM Duty Officer, and other emergency response organization members at the by the~~ EOC. ~~Additionally, this information may be gained from the –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-EM Duty Officers by computer.~~ The various response groups ~~shall~~ may 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~~
(W) 505-667-6211
(C) 505-699-1144
(H) 505-662-4173

Alternates:

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

Peter Salazar
912 Calle Quintana
Española, NM
(W) 505-747-1399
(C) 505-500-2594

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

Ted Ulibarri
County Rd. 88
Santa Fe NM 87506
(W) 505-667-6211
(C) 505-412-8737
(H) 505-614-4218

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-EM Duty Officer.

D.1.2 Hazardous Materials Response

1. The Hazardous Materials (HAZMAT) Group 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 Group may provide limited field decontamination support for victims. The HAZMAT Group 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 Group 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 Group 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 Group 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 Group may obtain resources from environmental monitoring groups, such as health physics and industrial hygiene personnel.

D.1.3 Environmental Protection and Compliance Division ~~and Waste Management Division~~ Response

At the scene, representatives and technical advisors from the Environmental Protection and Compliance Division (EPC) ~~Environmental Protection Division and Compliance (EPC), 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 EPC 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

Facility, D-4. 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-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-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-EM Duty Officer is notified when there is confirmed fire or smoke by the EOSC.

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 EOSC 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 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~~
 - ~~4.3. Mass Notification System~~
3. The Permittees' EOC, maintained by SEO-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-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-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-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-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. The EOSC ~~who~~ alerts the SEO-EM Duty Officer and, if warranted, the Los Alamos County Consolidated Dispatch Center, who then dispatches ~~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-EM personnel are notified of the emergency, the SEO-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-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-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-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, if safe to do so.
 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-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 EPC 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 EPC 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.

for Evaluating Solid Waste, Physical/Chemical Methods" (EPA, 1986), and approved updates, as applicable.

3. If a hazardous/mixed waste spill occurs on soil, any free liquid present will be collected and containerized. Liquids may be sorbed with a compatible nonbiodegradable sorbent prior to containerization. For such a spill, contaminated soil will either be excavated and containerized or remediated in situ. Industrial health and safety personnel will conduct industrial hygiene monitoring and, if mixed waste is involved, radiation protection personnel will conduct health physics monitoring, if deemed necessary, to minimize exposure during soil removal or remediation operations. Excavation or remediation will continue until soil contaminant concentrations are at a level approved by the Department.

4. If a hazardous/mixed waste spill occurs in an area with flooring, the floor will either be removed in lieu of decontamination, or the floor will be decontaminated. If the decision is made to decontaminate the floor, swipe samples or other types of sampling appropriate for the contaminant will be collected at random and characterized for decontamination verification. If, after several decontamination efforts, it is subsequently determined that the affected floor area cannot be decontaminated, the floor material will be removed. In all cases, wastes generated during the decontamination and/or removal process will be managed appropriately.

D.5 EXPLOSION

1. Explosions and resultant releases may result in a significant threat to human health or the environment. The potential exists for hazardous or mixed waste to be released during an 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-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. Where there is more than one agency (personnel from other organizations, such as the Federal Bureau of Investigation, or the Los Alamos Fire Department) with incident jurisdiction or when incidents cross political jurisdictions, agencies will work together through the designated member of the unified command to establish a common set of objectives and strategies and single incident Action Plan.

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 and will, if applicable, enter a unified command with the SEO-EM and other agencies to coordinate an effective response while

~~at the same time carrying out their own jurisdictional responsibilities. The LAFD Senior Officer will direct firefighting operations as the acting IC until SEO-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; and TA-63 Transuranic Waste Facility, D-1.
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 Dispatch Center by dialing 911. For any fire, including a fire that involves hazardous or mixed waste, the responsible Line Manager and SEO-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 or enters unified 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 and will, if applicable, enter a unified command with the SEO-EM and other agencies to coordinate an effective response while at the same time carrying out their own jurisdictional responsibilities.~~The LAFD Senior Officer will direct firefighting operations as the acting IC until the SEO-EM Duty Officer formally assumes command or enters unified 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-EM may provide assistance in

Attachment 2
Certification

CERTIFICATION

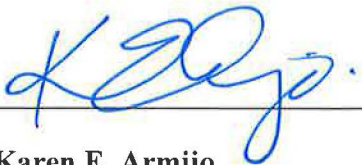
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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.



John C. Bretzke
Division Leader
Environmental Protection and Compliance Division
Los Alamos National Security, LLC

5-1-17

Date Signed



Karen E. Armijo
Permitting and Compliance Program Manager
National Nuclear Security Administration
U.S. Department of Energy
Owner/Operator

04 May 2017

Date Signed