

# **Attachment GG**

## **MWSF CONTINGENCY PLAN**

**CONTINGENCY PLAN AND EMERGENCY PROCEDURES  
MIXED WASTE STORAGE FACILITY**

**1. General Information**

Name of Facility: Mixed Waste Storage Facility (MWSF) located at the Puget Sound Naval Shipyard at the Bremerton Naval Complex

Name of Owner and Operator: United States Department of the Navy

Location of Facility: Building 1002  
Puget Sound Naval Shipyard  
1400 Farragut Avenue  
Bremerton, WA 98314-5001

Emergency Coordinator (Puget Sound Federal Fire Department): Puget Sound Federal Fire Department, dial 911 (can also activate fire alarm pull stations)

Phone Numbers: Outside Bremerton Naval Complex or by cellular phone, dial (360) 476-3333

Phone Number of Radiological Control Office: 6-2185 ext 250 or 200  
Outside Bremerton Naval Complex, dial (360) 476-2185 ext 250 or 200

Phone Number of Mixed Waste Storage Facility: 6-8970  
Outside the Bremerton Naval Complex, dial (360) 476-8970

Phone Number of Mixed Waste Storage Facility Supervisor's Office: 6-2033  
Outside the Bremerton Naval Complex, dial (360) 476-2033

Mixed Waste Storage Facility Operations: Receive, consolidate, and store pre-packaged sealed containers of mixed waste in metal boxes or metal drums

Site Plan Refer to Figure G-1

**2. Use of the Contingency Plan:**

The Contingency Plan provides response procedures intended to protect human health and the environment in the unlikely event that an emergency occurs involving mixed waste at the Mixed Waste Storage Facility (MWSF or 'facility'). Mixed waste is a mixture of low-level radioactive waste and chemically hazardous waste. Due to the nature of mixed waste generated, and the various structural and operational measures in place to minimize the risk of an emergency situation, an emergency that would result in off-site consequences or require assistance from off-site agencies is highly unlikely.

The MWSF Contingency Plan also provides procedures for handling damaged containers, or containers that might otherwise present a hazard to the public health and the environment. Such conditions may or may not result in an emergency condition.

Naval Nuclear Propulsion Program radiological emergency procedures will be implemented coincident with this Contingency Plan when mixed waste is involved.

### **3. Definitions:**

For the purposes of this plan, the term "**emergency**" refers to a fire, explosion, or sudden or non-sudden release of dangerous waste or dangerous waste constituents to air, soil, surface water, or ground water (whether accidental or from natural disaster). Incidental spills as defined below are not considered emergencies under this plan.

**Incidental spills** of mixed wastes where the substance can be absorbed, neutralized, or otherwise controlled at the time of spill by MWSF personnel are not considered to be emergencies if there is no possible release to air, soil, surface water, or groundwater. For example, a spill within the secondary containment berm of the facility would not normally be an emergency. A spill outside the facility entrance on a paved surface that can be absorbed, neutralized, or otherwise controlled at the time of release by MWSF personnel, so as not to enter soil or water, would also not normally be an emergency.

The "**initial responder**" is the first person on the scene of an emergency.

The "**emergency coordinator**" is the Federal Fire Department Incident Commander, upon arrival at the scene.

**4. Evacuation Procedure (use only when invoked in sections 8 or 9):** The initial responder will notify employees to evacuate by use of the fire alarm and by shouting. Employees will evacuate through the nearest exit (see Figure G-2 Evacuation Plan) and assemble at the Farragut Avenue gate. Primary or alternate evacuation routes consist of exiting the storage area by the most convenient of either of the personnel doors located at both ends of the building or the roll top (vehicle) door located at the North end of the building. Upon exiting, proceed to the assembly area located on Farragut Avenue. The initial responder assumes responsibility until the emergency coordinator arrives.

**5. Internal Notification Procedure (use only when invoked in sections 8 or 9):** The initial responder will notify the Federal Fire Department and the Radiological Control Office as follows:

**a. Federal Fire Department:** activate fire alarm pull station or telephone 911. Dial (360) 476-3333 if using a cellular phone. Upon arrival on scene, the Federal Fire Department Incident Commander (as emergency coordinator) is responsible for coordinating all further emergency response efforts. This responsibility includes ambulance dispatch and communication with Navy and local medical centers and local fire departments.

**b. Radiological Control Office:** dial 6-2185 ext 250 or 200. Outside the Bremerton Naval Complex, dial (360) 476-2185 ext 250 or 200.

**c. Information Required:** the MWSF Supervisor, or in their absence the person who discovered the incident (initial responder), must gather and report to the Federal Fire Department and the Radiological Control Office the following information:

**(SUMMON ASSISTANCE IMMEDIATELY - DO NOT DELAY INITIAL NOTIFICATION TO COLLECT THIS DATA)**

- (1) name and address of the facility;
- (2) time and type if incident (e.g. release, fire);
- (3) name and quantity of material(s) involved to the extent known;
- (4) extent of any injuries;
- (5) possible hazards to human health or the environment outside the facility.

**6. Spill/Release Control Procedure (use only when invoked in sections 8 or 9):** The procedures used to control a container spill or leak at the MWSF are dictated by the potential for spread of contamination. Only those personnel who are specifically tasked, trained, and equipped in proper work procedures are permitted to handle this situation. Other personnel shall limit the response to making the proper notifications and guarding the area from a safe distance until qualified responders arrive. Additional actions to be taken by qualified personnel include:

- (a) Don the appropriate PPE;
- (b) Stop the spill by righting overturned containers;
- (c) Warn others in the area and have unnecessary people leave;
- (d) Control further spread of the spill with dikes or berms and absorbents;
- (e) Isolate the spill area from further entry;

**7. Outside Agency Notification Procedure (use only as invoked in sections 8 or 9):**

If assessment of the event by the Radiological Control Office indicates that mixed waste has been released or will be released to an area outside of the secondary containment (berm) of the MWSF, the Radiological Control Office shall ensure that the agencies (below) are immediately notified with the information listed in section 5.c. above, including the name and telephone number of the reporter and name and address of the facility:

- (1) If the release exceeds the Reportable Quantity listed in 40 CFR 302.4, the Radiological Control Office will contact the:

National Response Center (NRC) 24 Hour Hotline at (800) 424-8802 or (202) 426-2675.

EPA Region X Federal Facilities Manager at 1-206-553-1263.

WA Emergency Management Division (EMD) at 1-800-258-5990

WA Dept. of Ecology Northwest Regional Office Spill/Compliance  
Section at 1-425-649-7000.

NOTE: The reportable quantity table in 40 CFR 302.4 designates releases of certain metals to not be reportable regardless of quantity if the metal released is in solid form and the diameter of the pieces of the solid metal released is equal to or exceeds 100 micrometers (0.004 inches or 0.1 millimeters). Releases of these metals would be reportable thus only if the diameter of pieces released was smaller than 100 micrometers (0.004 inches or 0.1 millimeters) as in a fine powder or as a liquid and if the released metal exceeded the reportable quantity provided in the table.

(2) If the release is not reportable to the NRC (above) but is considered to present a threat to human health or the environment, the Radiological Control Office will contact the:

WA Emergency Management Division (EMD) at 1-800-258-5990

WA Dept. of Ecology Northwest Regional Office Spill/Compliance  
Section at 1-425-649-7000.

(3) A release of 10 pounds or greater of material containing Polychlorinated Biphenyls (PCBs) to water or soil must be reported, independent of other criteria, if the released material contains PCBs at 50 ppm concentration or greater. In this situation, the Radiological Control Office will contact the:

EPA Region X Pesticides and Toxic Substances Branch at  
1-206-553-1918.

(4) Any release reported to outside agency under parts (1) through (3) above must be reported to Kitsap County. In this situation, the Radiological Control Office will contact the:

Kitsap County DEM at 1-360-616-5870 or after hours via CENCOM at  
1-360-478-0011.

## **8. Emergency Response Procedures:**

**a. Fire/Explosion:** Personnel will evacuate following the evacuation procedure of Section 4. Personnel will also initiate the internal notification procedure of Section 5.

(1) The initial responder is to activate the fire alarm and then attempt to extinguish small fires with a compatible fire extinguisher, remaining out of the smoke plume to the maximum extent possible. If the fire is not extinguished after expending one (1) fire extinguisher, personnel are to evacuate the area. If the fire is not small, the initial responder is to activate the fire alarm and immediately evacuate the area. In all cases, personnel are to secure the MWSF

until the Federal Fire Department arrives and continue to execute the appropriate emergency response notification and reporting procedures.

(2) After summoning assistance, the primary concern is assisting injured personnel. Personnel should remain cognizant of the possible presence of radioactive contamination and hazardous gases or vapors in the combustion products of any fire originating in the facility and not undertake any emergency response actions unless they can do so safely.

(3) In the event of an explosion, personnel are to evacuate the area at once, secure the MWSF until the Federal Fire Department arrives, and follow the appropriate emergency response, notification, and reporting procedures contained in this Contingency Plan. After summoning assistance, the primary concerns are assisting injured personnel.

(4) The Emergency Coordinator will support the Radiological Control Office as possible to determine whether outside agency notifications are required. If mixed waste has been released or will be released to an area outside of the secondary containment (berm) of the MWSF, the Radiological Control Office shall ensure that the outside agency notifications of section 7 are completed.

**b. Injuries:** Follow the internal notification procedure of section 5. The initial responder is to assist injured personnel, as required, until medical assistance arrives. Personnel are not to attempt to rescue injured personnel unless they are confident of their ability to do so safely and then only after notifying someone else of their intentions.

**c. Releases/Spills:**

(1) The initial responder will immediately assess the character, source, amount, and extent of the release. The initial responder will initiate the internal notification procedure of section 5. Qualified personnel discovering a leak or spill, such as an initial responder who is qualified to work with the substance that has been spilled, may initiate the Spill/Release Control Procedure of section 6 prior to the arrival of the Emergency Coordinator provided that

- they believe that it is within their capability to safely respond to the spill or leak, and
- another person, not responding to the spill or leak is aware of the incident and monitoring their situation from a safe distance

At the discretion of the initial responder, the initial responder shall direct qualified personnel available to don appropriate personnel protective equipment and attempt to control or contain a small spill using the Spill/Release Control Procedure of section 6. If the initial responder determines it appropriate, s/he will cease spill response efforts and, along with other qualified personnel available, guard the area from a safe distance until the arrival of the Emergency Coordinator. The initial responder shall have all unnecessary personnel evacuate the area by following the Evacuation Procedure of section 4.

(2) Upon arrival of the Emergency Coordinator, h/she will direct an immediate visual inspection of any hazardous substance release by qualified personnel. If not already done, the Spill/Release Control Procedure of

section 6 will be initiated as soon as the affected area is declared safe for entry. Priority will be given to preventing the spread of released material beyond the secondary containment (berm) of the MWSF. The Emergency Responder shall initiate Post Emergency Clean-up efforts as soon as practical when the release event has been terminated.

(3) The Emergency Coordinator will support the Radiological Control Office as necessary to determine whether outside agency notifications are required. If the spill/release is not an 'incidental spill' as defined in this plan, and poses a threat to human health or the environment, the Radiological Control Office shall initiate the Outside Agency Notification Procedure of section 7. Note that section 7 may or may not require specific notifications depending on the quantity of the release/spill and whether a threat exists to public health or environment.

**9. Procedures for the Receipt of Damaged Containers, or Containers that Otherwise are Not Acceptable in the MWSF, but Cannot be Transported:**

(a) The initial responder shall determine an area of the facility where the waste can be safely stored based on container labeling and/or waste profile information and make notification of the situation to the Radiological Control Office.

(b) If a container is damaged, place the container in an overpack or cofferdam capable of containing the contents of the container should it begin to leak.

(i) Incidental spills of mixed wastes where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by MWSF personnel are not considered to be emergencies if there is no possible release to air, soil, surface water, or groundwater.

(ii) Spills/releases that do not meet the definition of incidental spill will be treated as emergency events. The complete Internal Notification Procedure of section 5 and the Spill/Release Control Procedure of section 6 will be initiated. The Outside Agency Notification Procedure of section 7 will also be initiated. Note that section 7 may or may not require notification depending on the quantity or nature of the release/spill and whether a threat exists to public health or environment.

(c) The Radiological Control Office shall contact the generator of the waste for instructions on consolidating the damaged or leaking waste container in an overpack.

(d) If necessary, the Radiological Control Office shall determine an alternate storage facility capable of safely storing the waste.

(e) If necessary, the Radiological Control Office shall direct the preparation of the waste for proper shipment and direct the shipment the waste.

**10. Emergency Equipment:** Refer to Table G-1, Emergency Equipment, and Figure G-1, Site Plan. This Contingency Plan, through reference to section 5, will use the MWSF Fire Alarm for internal notification of all emergency events. This alarm is a high pitched horn. No other alarms are present.

**11. Emergency Coordinators:** The Emergency Coordinator is responsible for being familiar with all aspects of this Contingency Plan, MWSF layout and operations, the location and characteristics of the wastes being handled, and the location and format of MWSF records. The Emergency Coordinator has the authority to commit necessary resources in accordance with the response procedures of Section 4 of this contingency plan. Once notified of an emergency, the Federal Fire Department on-shift Incident Commander (summon by fire alarm or 911) assumes the role and responsibilities of the Emergency Coordinator. Hazard assessment regarding spilled/released material and outside agency communication is coordinated with the Radiological Control Office. Responsibilities of the Emergency Coordinator include:

- (a) on-site and on-call availability;
- (b) familiarity with this Contingency Plan, the MWSF layout and operations, waste locations and characteristics, and location and format of records;
- (c) authority to commit necessary resources;
- (d) activation of alarms and communication systems;
- (e) identification and characterization of the release;
- (f) assessment of public health effects<sup>1</sup>;
- (g) surrounding area evacuation notification<sup>1</sup>;
- (h) prevention of spread or recurrence of the emergency;
- (i) monitor leaks, pressure buildup, gas generation, and rupture of pipes, valves, and other equipment;
- (j) cleanup provisions;
- (k) maintenance of emergency equipment;
- (l) agency notification and reporting<sup>1</sup>
- (m) incident record keeping; and
- (n) storage of released materials.
- (o) The Emergency Coordinator may delegate action to other Shipyard organizations (e.g., Radiological Control Office) as necessary.

<sup>1</sup>Note: Hazard assessment regarding spilled/released material coordinated with Radiological Control Office. All outside official/agency notification requirements are fulfilled by the Radiological Control Office.

**12. Arrangements with Local Emergency Responders and Providers:** The Shipyard maintains agreements with local Fire Departments to provide emergency services as requested by the Emergency Coordinator. However, outside agencies (such as local Fire

Departments) are not relied upon to provide emergency services at the MWSF, and would be used at the facility only in an unlikely circumstance where federal services were not sufficient. Harrison Memorial Hospital and Naval Hospital Bremerton may be called upon to provide medical services to injured personnel transported to their facilities. During an emergency, the Federal Fire Department provides hospitals with hazard information which communicates an individual's chemical exposure should BNC personnel require medical services from a local hospital.

**13. Where the Contingency Plan is Kept on File:**

The MWSF Contingency Plan is kept on file at the MWSF, the Radiological Control Office, the Puget Sound Federal Fire Department, Police Department, and Medical Clinic. The Federal Fire Department is provided with detailed information on the amounts and types of waste stored at the MWSF.

As discussed in section 12., outside agencies are not relied upon to provide emergency services at the MWSF, and would be used at the facility only in an unlikely circumstance where federal services were not sufficient. Copies of the contingency plan will be made available to such agencies as needed.

**14. Follow-Up (post emergency) Actions:**

a) Post emergency actions could involve inventorying the mixed waste, sampling suspect areas for dangerous waste contamination, and clean up and disposal operations.

1) Any material that results from a release, fire, or explosion at the facility will be properly stored, or disposed of. Wastes will be characterized per the Waste Analysis Plan, section C. Wastes will be moved to a less than 90 day accumulation area if storage in the MWSF is not possible during clean-up actions.

2) Any incompatible waste generated as a result of an emergency will not be placed at affected areas in the MWSF until clean-up is completed. This waste would require physical separation by a distance greater than 20 feet from one another on isolated spill control pallets or by using non-combustible partitions which extend 18 inches above and 18 inches to the sides of the containers. During normal operation, no such waste is expected to be present at the MWSF. Prior to a waste being placed in the facility, a characterization is performed by technical personnel familiar with the mixed waste streams currently in storage and qualified to recognize whether a waste stream would be incompatible, ignitable or reactive. This information will prevent the unnecessary generation of such waste.

3) The BNC will ensure that mixed waste remaining at the facility is not stored in an unsafe manner, and that any unsafe condition at the facility is expeditiously repaired. Emergency equipment contaminated with dangerous waste will be immediately replaced with uncontaminated equipment.

**b) Reporting:**

The Radiological Control Office shall report the following information to the WA Emergency Management Division (EMD) within 15 days of the emergency event:

- (a) name, address and telephone number of the facility and owner/operator.
- (b) date, time, and type of incident (explosion, fire, etc.)
- (c) name and quantity of material(s) involved;
- (d) extent of any injuries;
- (e) an assessment of actual or potential hazards to human health or the environment, where this is applicable
- (f) estimated quantity and disposition of recovered material that resulted from the incident;
- (g) cause of incident and description of corrective action taken to prevent reoccurrence.

A copy of the report is also sent to the National Response Center within fifteen days if an emergency event has resulted in a release has occurred above the minimal reportable quantity listed in the Code of Federal Regulations, Title 40 Part 302.4.

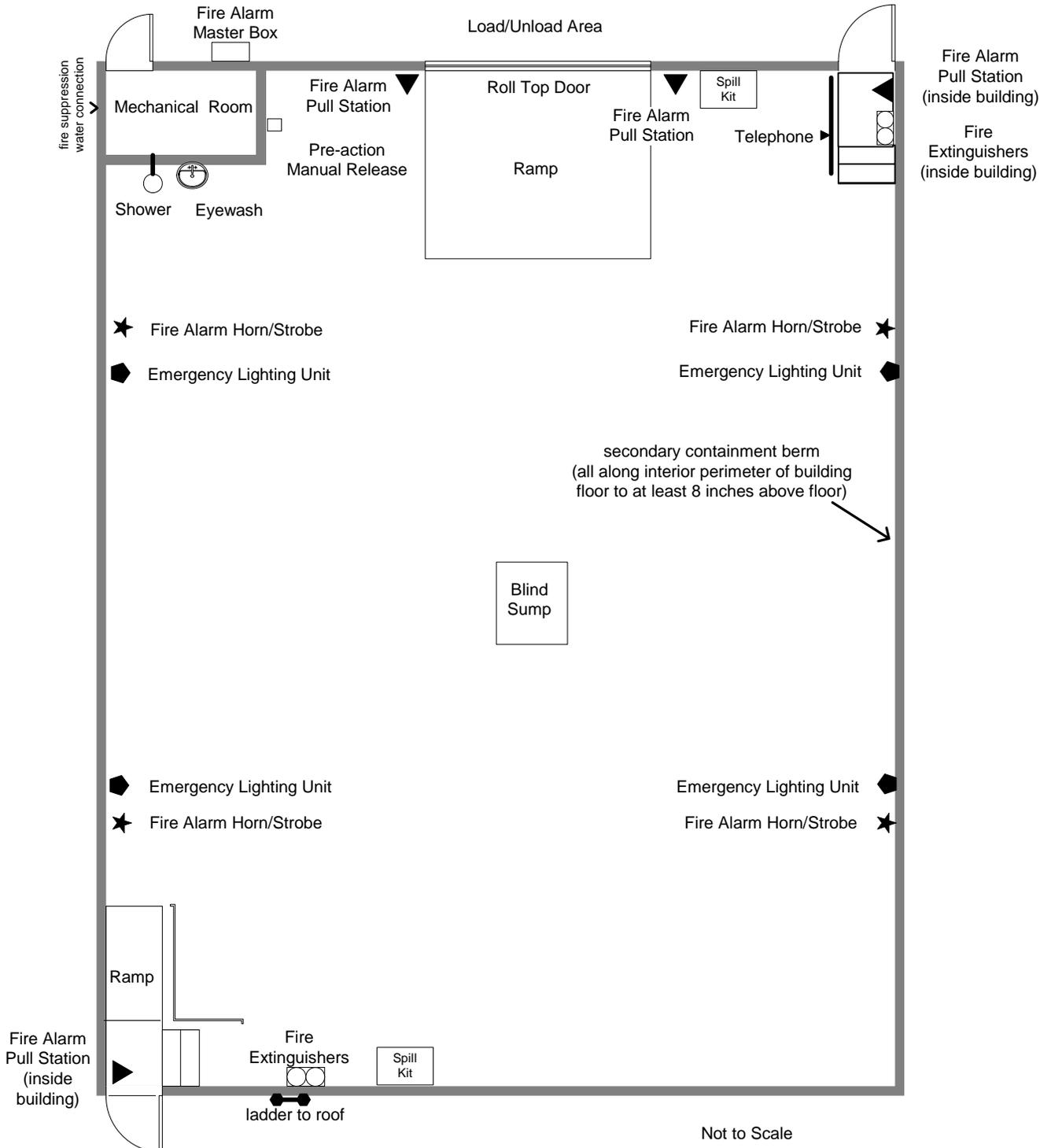
**Table G-1  
MWSF Emergency Equipment**

<b>ITEM</b>	<b>DESCRIPTION (QUANTITY) (typical)</b>	<b>LOCATION</b>
Respirators	Full-face respirators (8)	In Spill Kits inside the MWSF.
Goggles	Goggles (splash guards) and/or Face Shields (8 pair)	In Spill Kits inside the MWSF
Boots	Chemical resistant boots (8 pair)	In Spill Kits inside the MWSF
Coveralls	Full cover TYVEK suits (8 pair)	In Spill Kits inside the MWSF
Gloves	Nitrile gloves (20 pair), butyl rubber gloves (24 pair)	In Spill Kits inside the MWSF
Telephone	Telephone (1)	Inside the MWSF
Fire Alarm	Fire alarm pull stations (5) with alarm horn boxes and strobe lights.	Four inside the MWSF and one (Master Control Box) on the exterior front wall
Fire Extinguishers	Portable fire extinguishers (4)	Inside the MWSF
Safety Shower	Combination safety shower/eyewash unit (1)	Inside the MWSF
Spill Control Equipment Kits	Spill kits (2) with absorbent, neutralizers, coagulant, berm material, barrier rope, containment bags, tape	Inside the MWSF
Secondary Containment (berm)	8 inch epoxy coated berm/floor draining to a 2.5' X 2.5' X 2.5' blind sump in center	Berm on the entire interior perimeter of the storage area; blind sump in the center
Vacuum Cleaner	HEPA filtered vacuum	Inside the MWSF
Emergency Lighting	Floodlights with battery packs (4)	Wall Mounted

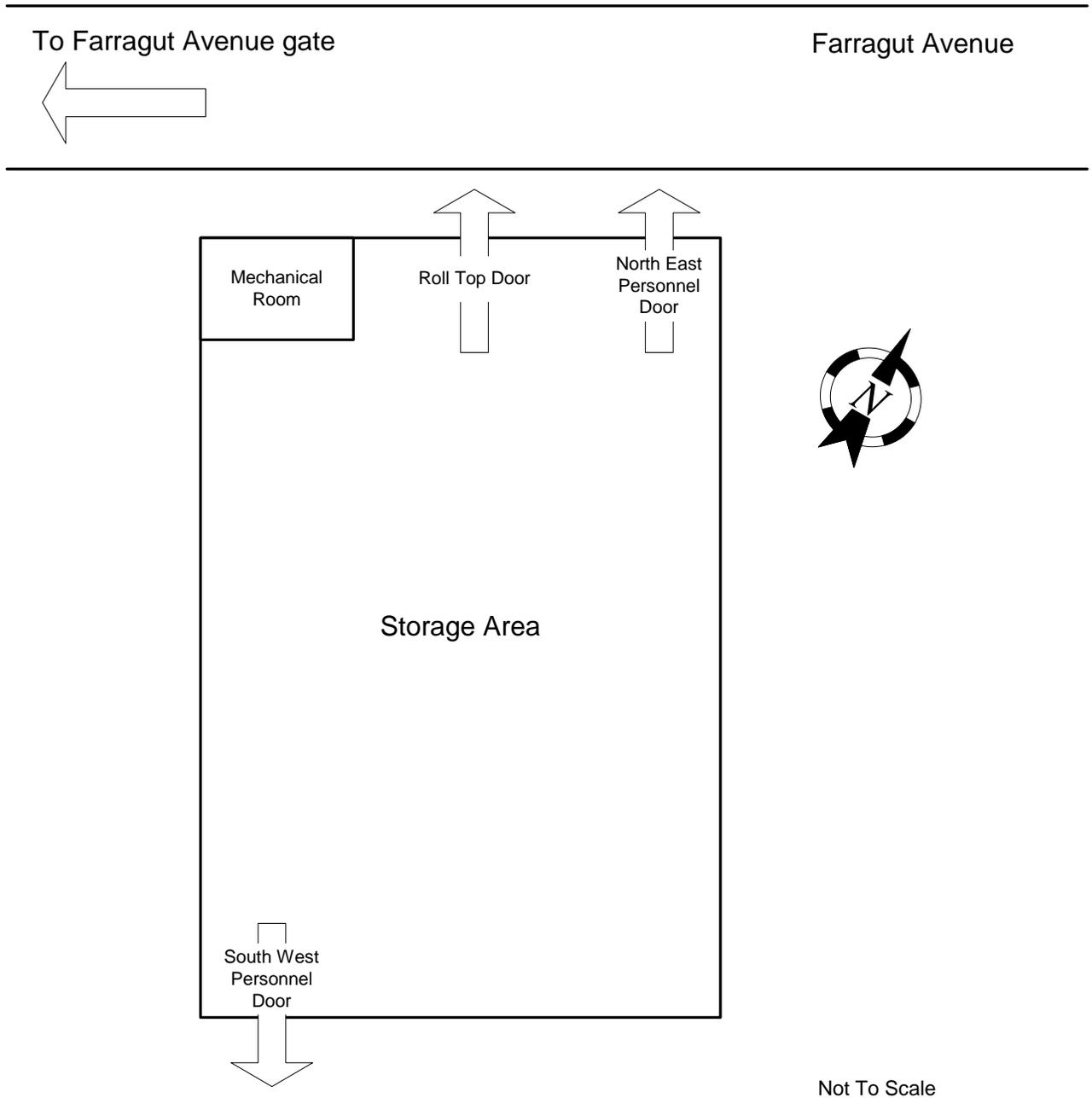
Note: See Figure G-1 for location of emergency equipment

**Figure G-1  
Mixed Waste Storage Facility  
Site Plan**

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**Figure G-2  
Mixed Waste Storage  
Facility Evacuation Plan**



Exit the storage area by either of the personnel doors located at both ends of the building or the roll top (vehicle) door located at the North end of the building. Upon exiting, proceed to the assembly area located at the Farragut Avenue gate.