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ADDENDUM J.1
PRE-ACTIVE LIFE CONTINGENCY PLAN

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ADDENDUM J.1
PRE-ACTIVE LIFE CONTINGENCY PLAN

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J.0 CONTINGENCY PLAN

The requirements in this Addendum that address activities involving the receipt and disposal of dangerous waste as defined in [WAC 173-303-040](#) shall be applied during the "Active Life" of the IDF. Active Life of a facility means the period from the initial receipt of dangerous waste at the facility until the department receives certification of final closure ([WAC 173-303-040](#)). The requirements of this Addendum that do not apply to receipt and disposal of dangerous waste as defined in [WAC-173-303-040](#), shall be implemented by the Permittees during the "Pre-Active Life" of IDF. Pre-Active Life is not defined in the regulations, but refers to the facility maintenance period between final construction and the start of active life. Once the IDF begins to receive dangerous waste, the requirements in Addendum J.1 are no longer applicable, and requirements in Addendum J.2 will be applicable.

The requirements for a contingency plan at IDF are satisfied in the following documents: portions of the Hanford Facility RCRA Permit (Permit) Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) and this Addendum.

The unit-specific building emergency plan also serves to satisfy a broad range of other requirements [e.g., Occupational Safety and Health Administration standards ([29 CFR 1910](#)), *Toxic Substance Control Act of 1976* ([40 CFR 761](#)) and U.S. Department of Energy Orders]. Therefore, revisions made to portions of this unit-specific building emergency plan that are not governed by the requirements of [WAC 173-303](#) will not be considered as a modification subject to [WAC 173-303-830](#) or Permit Condition I.C.3.

Table J.1 identifies the sections of the unit-specific building emergency plan written to meet [WAC 173-303-350\(3\)](#) contingency plan requirements. Section 12.0 of the unit-specific building emergency plan is written to meet [WAC 173-303](#) requirements identifying where copies of Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) and the building emergency plan are located and maintained on the Hanford Facility. Therefore, revisions to Addendum J require a Permit modification subject to [WAC 173-303-830](#) and/or Permit Condition I.C.3.

Table J.1. Hanford Facility Documents Containing Contingency Plan Requirements of [WAC 173-303-350\(3\)](#)

| Requirement | Permit Attachment 4, Hanford Emergency Management Plan (DOE/RL-94-02): | Building Emergency Plan ¹ (HNF-39903) | Addendum J |
|--|---|--|---|
| -350(3)(a) - A description of the actions which facility personnel must take to comply with this section and WAC 173-303-360 . | X ² Section 1.3.4 | X ² Sections 7.1, 7.2 through 7.2.5, and 7.3 ³ Sections 4.0, 8.2, 8.3, 8.4, and 11.0 | X ² Sections J.3.1, J.3.2 through J.3.2.5, and J.3.3 ³ Sections J.3, J.3.4, J.3.5, J.3.6, and J.5 |
| -350(3)(b) - A description of the actions which shall be taken in the event that a dangerous waste shipment, which is damaged or otherwise presents a hazard to the public health and the environment, arrives at the facility, and is not acceptable to the owner or operator, but cannot be transported pursuant to the requirements of WAC 173-303-370(5) , Manifest system, reasons for not accepting dangerous waste shipments. | X ² Section 1.3.4 | X ^{2,4} Section 7.2.5.1 | X ^{2,4} Section J.3.2.5.1 |
| -350(3)(c) - A description of the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services as required in WAC 173-303-340(4) . | X Sections 3.2.3, 3.3.1, 3.3.2, 3.4, 3.4.1.1, 3.4.1.2, 3.4.1.3, 3.7, and Table 3-1 | | |

| Requirement | Permit Attachment 4, Hanford Emergency Management Plan (DOE/RL-94-02): | Building Emergency Plan ¹ (HNF-39903) | Addendum J |
|---|--|--|--|
| -350(3)(d) - A current list of names, addresses, and phone numbers (office and home) of all persons qualified to act as the emergency coordinator required under WAC 173-303-360(1) . Where more than one person is listed, one must be named as primary emergency coordinator, and others must be listed in the order in which they will assume responsibility as alternates. For new facilities only, this list may be provided to the department at the time of facility certification (as required by WAC 173-303-810(14)(a)(I)), rather than as part of the permit application. | | X ⁵ Sections 3.1 and 13.0 | X ⁵ Sections J.2 and J.7 |
| -350(3)(e) - A list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities. | | X Section 9.0 | X Section J.4 |
| -350(3)(f) - An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe the signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes. | X ⁶ Figure 7-3 and Table 5-1 | X ⁷ Section 1.5 | X ⁷ Section J.1 |

- 1 An 'X' indicates requirement applies.
- 2 ¹ Portions of Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) not enforceable through Appendix A of that
- 3 document are not made enforceable by reference in the building emergency plan.
- 4 ² Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) contains descriptions of actions relating to the Hanford
- 5 Site Emergency Preparedness System. No additional description of actions is required at the site level. If other credible scenarios exist
- 6 or if emergency procedures at the unit are different, the description of actions contained in the building emergency plan will be used
- 7 during an event by a building emergency director.
- 8 ³ Sections 7.1, 7.2 through 7.2.5, and 7.3 of the building emergency plan are those sections subject to the Class 2 "Changes in emergency
- 9 procedures (i.e., spill or release response procedures,)" described in [WAC 173-303-830](#), Appendix I Section B.6.a.
- 10 ⁴ This requirement only applies to treatment, storage, and disposal (TSD) units that receive shipment of dangerous or mixed waste
- 11 defined as offsite shipments in accordance with [WAC 173-303](#).
- 12 ⁵ Emergency Coordinator names and home telephone numbers are maintained separate from any contingency plan document on file in
- 13 accordance with Permit Condition II.A.4. and is updated, at a minimum, monthly.
- 14 ⁶ The Hanford Facility (Sitewide) signals are provided in this document. No unit/building signal information is required unless unique
- 15 devices are used at the unit/building.
- 16 ⁷ An evacuation route for the TSD unit must be provided. Evacuation routes for occupied buildings surrounding the TSD unit are
- 17 provided through information boards posted within buildings.
- 18

1 **J.1 Building Evacuation Routing**

2 [Figure J.1](#) provides identification of the primary and secondary staging areas and a general layout of the
3 IDF. Alternate evacuation routes will be used on a case-by-case basis based on meteorological conditions
4 at the time of the event.

5 **J.2 Building Emergency Director/Building Warden (BED/BW)**

6 Emergency response will be directed by the BED/BW until the Incident Commander (IC) arrives. The
7 Incident Command System (ICS) and staff with supporting on-call personnel fulfill the responsibilities of
8 the Emergency Coordinator as discussed in [WAC 173-303-360](#). During events, IDF personnel perform
9 response duties under the direction of the BED/BW. The Incident Command Post (ICP) is managed by
10 the senior Hanford Fire Department official, unless the event is determined to be primarily a security
11 event, in which case the Hanford Fire Department and Hanford Patrol will operate under a unified
12 command system with Hanford Patrol making all decisions pertaining to security. These individuals are
13 designated as the IC, and as such, have the authority to request and obtain any resources necessary for
14 protecting people and the environment.

15 The BED/BW becomes a member of the ICP and functions under the direction of the IC. In this role, the
16 BED/BW continues to manage and direct IDF operations.

17 A listing of BED/BWs by title, work location, and work telephone number is contained in [Section J.7.1](#) of
18 this plan. The BED/BW is on the premises or is available through “on-call” list 24-hours a day. Names
19 and home telephone numbers of the BED/BWs are available from the Patrol Operations Center (POC) in
20 accordance with Permit Condition II.A.4.

21 **J.3 Implementation of the Plan**

22 In accordance with [WAC 173-303-360\(2\)\(b\)](#), the BED/BW ensures that trained personnel identify the
23 character, source, amount, and areal extent of the release, fire, or explosion to the extent possible.
24 Identification of waste can be made by activities that can include, but are not limited to, visual inspection
25 of dangerous waste, sampling activities in the field, reference to inventory records, or by consulting with
26 facility personnel. Samples of materials involved in an emergency might be taken by qualified personnel
27 and analyzed as appropriate. These activities must be performed with a sense of immediacy and shall
28 include available information.

29 The BED shall use the following guidelines to determine if an event has met the requirements of
30 [WAC 173-303-360\(2\)\(d\)](#):

- 31 1. The event involved an unplanned spill, release, fire, or explosion,
32 AND
- 33 2.a. The unplanned spill or release involved a dangerous waste, or the material involved became a
34 dangerous waste as a result of the event (e.g., product that is not recoverable.),
35 OR
- 36 2.b. The unplanned fire or explosion occurred at the IDF or transportation activity subject to RCRA
37 contingency planning requirements,
38 AND
- 39 3. Time-urgent response from an emergency services organization was required to mitigate the event
40 or a threat to human health or the environment exists.

41 As soon as possible, after stabilizing event conditions, the BED/BW shall determine, in consultation with
42 the site contractor environmental single point-of-contact, if notification to the Washington State
43 Department of Ecology (Ecology) is needed to meet [WAC-173-303-360 \(2\)\(d\)](#) reporting requirements. If
44 all of the conditions under 1, 2, and 3 are met, notifications are to be made to Ecology.
45 Additional information is found in Permit Attachment 4, *Hanford Emergency Management Plan*
46 (DOE/RL-94-02), Section 4.2.

1 If review of all available information does not yield a definitive assessment of the danger posed by the
2 incident, a worst-case condition will be presumed and appropriate protective actions and notifications will
3 be initiated. The BED/BW is responsible for initiating any protective actions based on their best
4 judgment of the incident.

5 The BED/BW must assess each incident to determine the response necessary to protect the personnel,
6 facility, and the environment. If assistance from Hanford Patrol, Hanford Fire Department, or ambulance
7 units is required, the Hanford Emergency Response Number (911 from site office phones/373-0911 from
8 cellular phones) must be used to contact the POC and request the desired assistance. To request other
9 resources or assistance from outside the IDF, the POC business number is used (373-3800).

10 **J.3.1 Protective Actions Responses**

11 Protective action responses are discussed in the following sections. The steps identified in the following
12 description of actions do not have to be performed in sequence because of the unanticipated sequence of
13 incident events.

14 **J.3.1.1 Evacuation**

15 If an evacuation is ordered or the evacuation siren sounds in the area of the IDF, personnel will proceed to
16 the staging area.

17 The BED/BW or staging area manager directs the evacuation; however, to ensure that evacuations can be
18 conducted promptly and safely, all personnel must be familiar with the evacuation procedure.

19 Area evacuations are rapid or controlled and the differences between them are pointed out in the
20 following steps. When possible, these steps must be performed concurrently.

| AREA EVACUATION PROCEDURE |
|---|
| Halt any operations or work and place equipment and structures in a safe condition. Use emergency shutdown procedures for rapid evacuation. |
| Use whatever means are available (portable radios, bullhorns, runners, etc.) to pass the evacuation information to personnel. |
| Evacuate personnel to the staging area; group personnel as follows: potentially contaminated protective clothing, keys immediately available for vehicles, and those needing rides. Assist personnel that are temporary/permanently disabled. |
| Conduct personnel accountability. If unable to account for personal, report personnel accountability results to the Hanford Emergency Operations Center (Hanford-EOC). |
| Inform IC of any potentially affected personnel (i.e., injured, contaminated, exposed, etc.) once the IC arrives at the ICP. |
| Relay pertinent evacuation information (routes, destination etc.) to drivers. |
| Dispatch vehicles as soon as the vehicles are loaded. |
| Report status to the Hanford-EOC, request additional transportation if required, and report if any personnel remain who are performing late shutdown duties. |

21 **J.3.1.2 Take Cover**

22 When the Take Cover Alarm is activated, personnel will take cover in the nearest suitable building or
23 trailer.

24 A message followed by the Take Cover siren is transmitted over the area emergency sirens. The
25 following actions must be taken or considered:

- 26 • Shut doors and windows and wait for further instructions.
- 27 • Secure ventilation system.
- 28 • Follow normal exit procedures from radiological areas.

- 1 • Lock up classified documents and prepare for a possible evacuation.
- 2 • Report your location to the Accountability Aid or the BED/BW.
- 3 • Accountability Aides will provide accountability status to the Staging Area Manager for IDF
- 4 personnel during an event.
- 5 • Inform IC of any potentially affected personnel (i.e., injured, contaminated, exposed, etc.) once
- 6 the IC arrives at the ICP.

7 **J.3.2 Response to Facility Operations Emergencies**

8 Depending on the severity of the event, the BED/BW reviews the site-wide and IDF emergency response
9 procedure(s) and, as required, categorizes and/or classifies the event. If necessary, the BED/BW initiates
10 area protective actions and Hanford Site Emergency Response Organization activation. The steps
11 identified in the following description of actions do not have to be performed in sequence because of the
12 unanticipated sequence of incident events.

13 **J.3.2.1 Loss of Utilities**

14 The only loss of utilities is electrical. Loss of electricity does not constitute an emergency, but must be
15 restored as soon as possible. Electricity supplies power to the sump pumps used to remove accumulated
16 leachate from the primary and secondary liners. The loss of water, ventilation, steam, air, and vacuum are
17 not applicable to the IDF.

18 **J.3.2.2 Major Process Disruption/Loss of Plant Control**

19 N/A

20 **J.3.2.3 Pressure Release**

21 N/A

22 **J.3.2.4 Fire and/or Explosion**

23 In the event of a fire, the discoverer activates a fire alarm (pull box); calls 911 from site office
24 phones/373-0911 from cellular phones or verifies that the Hanford Emergency Response Number has
25 been called.

- 26 • Unless otherwise instructed, personnel shall evacuate the area/building by the nearest safe exit
27 and proceed to the designated staging area for accountability.
- 28 • On actuation of the fire alarm, ONLY if time permits, personnel should shut down equipment and
29 secure waste. The alarm automatically signals the Hanford Fire Department.
- 30 • The BED/BW proceeds directly to the ICP, obtains all necessary information pertaining to the
31 incident, and sends a representative to meet Hanford Fire Department.
- 32 • The BED/BW provides a formal turnover to the IC when the IC arrives at the ICP.
- 33 • The BED/BW informs the Hanford Site Emergency Response Organization as to the extent of the
34 emergency (including estimates of dangerous waste and mixed waste quantities released to the
35 environment).
- 36 • If operations are stopped in response to the fire, the BED/BW ensures that systems are monitored
37 for leaks, pressure buildup, gas generation, and ruptures.
- 38 • Hanford Fire Department firefighters extinguish the fire as necessary.

39 **J.3.2.5 Hazardous Material, Dangerous and/or Mixed Waste Spill**

40 Spills can result from many sources including process leaks, container spills or leaks, damaged packages
41 or shipments, or personnel error. Spills of mixed waste are complicated by the need to deal with the extra
42 hazards posed by the presence of Atomic Energy Act materials.

- 1 • The discoverer notifies the BED/BW and initiates SWIMS response:
 - 2 ○ Stops work.
 - 3 ○ Warns others in the vicinity.
 - 4 ○ Isolates the area.
 - 5 ○ Minimizes the exposure to the hazards.
 - 6 ○ Requests the BED/BW Secure ventilation.
- 7 • The BED/BW determines if emergency conditions exist requiring response from the Hanford Fire
- 8 Department based on classification of the spill and injured personnel, and evaluates need to
- 9 perform additional protective actions.
- 10 • If the Hanford Fire Department resources are not needed, the spill is mitigated with resources
- 11 identified in [Section J.4.5](#) and proper notifications are made.
- 12 • If the Hanford Fire Department resources are needed, the BED/BW calls 911 from site office
- 13 phones/373-0911 from cellular phones.
- 14 • The BED/BW sends a representative to meet the Hanford Fire Department.
- 15 • The BED/BW provides a formal turnover to the IC when the IC arrives at the ICP.
- 16 • The BED/BW informs the Hanford Site Emergency Response Organization as to the extent of the
- 17 emergency (including estimates of dangerous waste and mixed waste quantities released to the
- 18 environment).
- 19 • If operations are stopped in response to the spill, the BED ensures that systems are monitored for
- 20 leaks, pressure buildup, gas generation, and ruptures.
- 21 • Hanford Fire Department stabilizes the spill.

22 **J.3.2.6 Damaged or Unacceptable Shipments**

23 The IDF does not receive onsite transfers or off-site shipments of dangerous and/or mixed waste.

24 **J.3.3 Prevention of Recurrence or Spread of Fires, Explosions, or Releases**

25 The BED/BW, as part of the ICP, takes the steps necessary to ensure that a secondary release, fire, or

26 explosion does not occur. The BED/BW takes measures, where applicable, to stop processes and

27 maintenance activities, collect and contain released waste, and remove or isolate containers. The

28 BED/BW shall also monitor for leaks, pressure buildups, gas generation, or ruptures in valves, pipes or

29 other equipment, whenever this is appropriate.

30 **J.3.4 Termination of Event, Incident Recovery, Restart of Operations**

31 Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 9.0, describes

32 actions for event termination, incident recovery, and restart of operations. The extent by which these

33 actions are employed is based upon the incident classification of each event.

34 In addition, Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), also contains

35 actions for the management of incompatible waste that might apply.

36 **J.3.4.1 Termination of Event**

37 For events where the Hanford Emergency Operations Center (Hanford-EOC) is activated, the DOE-RL or

38 DOE Office of River Protection Emergency Manager has the authority to declare event termination. This

39 decision is based on input from the BED/BW, IC, and other emergency response organization members.

40 For events where the Hanford-EOC is not activated, the ICS and staff will declare event termination.

41 **J.3.4.2 Incident Recovery and Restart of Operations**

42 A recovery plan is developed when necessary in accordance with Permit Attachment 4, *Hanford*

43 *Emergency Management Plan* (DOE/RL-94-02), Section 9.2. A recovery plan is needed following an

1 event where further risk could be introduced to personnel, the IDF, or the environment through recovery
2 action and/or to maximize the preservation of evidence.

3 If this plan was implemented according to [Section J.3](#), Ecology is notified before operations can resume.
4 Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 5.1, discusses
5 different reports to outside agencies. This notification is in addition to those required reports and must
6 include the following statements:

- 7 • There are no incompatibility issues with the waste and released materials from the incident.
- 8 • All the equipment has been cleaned, fit for its intended use, and placed back into service.

9 The notification required by [WAC 173-303-360\(2\)\(j\)](#) may be made via telephone conference. Additional
10 information that Ecology requests regarding these restart conditions will be included in the required
11 15-day report identified in Section J.5.

12 For emergencies not involving activation of the Hanford-EOC, the BED/BW ensures that conditions are
13 restored to normal before operations are resumed. If the Hanford Site Emergency Response Organization
14 was activated and the emergency phase is complete, a special recovery organization could be appointed at
15 the discretion of RL to restore conditions to normal. This process is detailed in RL and contractor
16 emergency procedures. The makeup of this organization depends on the extent of the damage and the
17 effects. The onsite recovery organization will be appointed by the appropriate contractor's management.

18 **J.3.5 Incompatible Waste**

19 After an event, the BED/BW or the onsite recovery organization ensures that no waste that might be
20 incompatible with the released material is treated, stored, and/or disposed of until cleanup is completed.
21 Clean up actions are taken by IDF personnel or other assigned personnel. Permit Attachment 4, *Hanford*
22 *Emergency Management Plan* (DOE/RL-94-02), Section 9.2.3, describes actions to be taken.

23 Waste from cleanup activities is designated and managed as newly generated waste. A field check for
24 compatibility is performed before storage, as necessary. Incompatible wastes are not placed in the same
25 container. Containers of waste are placed in approved storage areas appropriate for their compatibility
26 class.

27 If incompatibility of waste was a factor in the incident, the BED/BW or the onsite recovery organization
28 ensures that the cause is corrected.

29 **J.3.6 Post Emergency Equipment Maintenance and Decontamination**

30 All equipment used during an incident is decontaminated (if practicable) or disposed of as spill debris.
31 Decontaminated equipment is checked for proper operation before storage for subsequent use.
32 Consumables and disposed materials are restocked. Fire extinguishers are replaced.

33 The BED/BW ensures that all equipment is cleaned and fit for its intended use before operations are
34 resumed. Depleted stocks of neutralizing and absorbing materials are replenished, and protective clothing
35 is cleaned or disposed of and restocked, etc.

36 **J.4 Emergency Equipment**

37 Emergency resources and equipment for the IDF are presented in this section.

38 **J.4.1 Fixed Emergency Equipment**

| FIXED EMERGENCY EQUIPMENT | | |
|---------------------------|----------|------------------|
| Type | Location | Capability |
| 6 Inch Fire Hydrants | IDF | Fire suppression |

1 **J.4.2 Portable Emergency Equipment**

| PORTABLE EMERGENCY EQUIPMENT | | |
|------------------------------|--|---|
| Type | Location | Capability |
| Fire extinguishers | In motorized equipment (e.g., trucks, etc.), nearby structures (e.g., change trailers, storage buildings, etc.). | Use on any Class A, B, or C fires. (Note: Some are only B and C.) Do NOT use on sodium. |

2 **J.4.3 Communications Equipment/Warning Systems**

| COMMUNICATIONS EQUIPMENT | | |
|--------------------------|----------|---------------|
| Type | Location | Capability |
| Cell phones | Portable | Communication |

3 NOTE: Site-wide communications and warning systems are identified in Permit Attachment 4, Hanford Emergency
4 Management Plan (DOE/RL-94-02), Table 5.1.

5 **J.4.4 Personal Protective Equipment**

| PERSONAL PROTECTIVE EQUIPMENT | | |
|-------------------------------|----------|------------|
| Type | Location | Capability |
| N/A | | |

6 **J.4.5 Spill Control and Containment Supplies**

| SPILL KITS AND SPILL CONTROL EQUIPMENT | | |
|--|----------|------------|
| Type | Location | Capability |
| N/A | | |

7 **J.4.6 Incident Command Post**

8 The ICPs for the IDF are in MO-720 and MO-438. Emergency resource materials are stored at each
9 location. The IC could activate the Hanford Fire Department Mobile Command Unit if necessary.

10 **J.4.7 Coordination Agreements**

11 RL has established a number of coordination agreements, or memoranda of understanding (MOU) with
12 various agencies to ensure proper response resource availability for incidents involving the Hanford Site.
13 A description of the agreements is contained in Permit Attachment 4, *Hanford Emergency Management*
14 *Plan* (DOE/RL-94-02), Section 3.0, Table 3-1.

15 **J.5 Required Reports**

16 Post incident written reports are required for certain incidents on the Hanford Site. The reports are
17 described in Permit Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02), Section 5.1.

18 Facility management must note in the TSD-unit operating record, the time, date, and details of any
19 incident that requires implementation of the contingency plan ([Section J.3](#)). Within fifteen (15) days after
20 the incident, a written report must be submitted to Ecology. The report must include the elements
21 specified in [WAC 173-303-360\(2\)\(k\)](#).

22 **J.6 Plan Location and Amendments**

23 Copies of this plan are maintained at the following locations:

- 24 • MO-720
- 25 • MO-438

1 This plan is reviewed and immediately amended as necessary, in accordance with Permit Attachment 4,
2 *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 14.3.1.1.

3 **J.7 Facility/Building Emergency Response Organization**

4 **J.7.1 Building Emergency Director/Building Warden**

| TITLE | WORK LOCATION | WORK PHONE |
|--------------------------|---------------|------------|
| Shift Operations Manager | MO-720 | 373-7777 |

5 Names and home telephone numbers of the BED/BWs are available from the POC (373-3800) in
6 accordance with Permit Condition II.A.4.

7

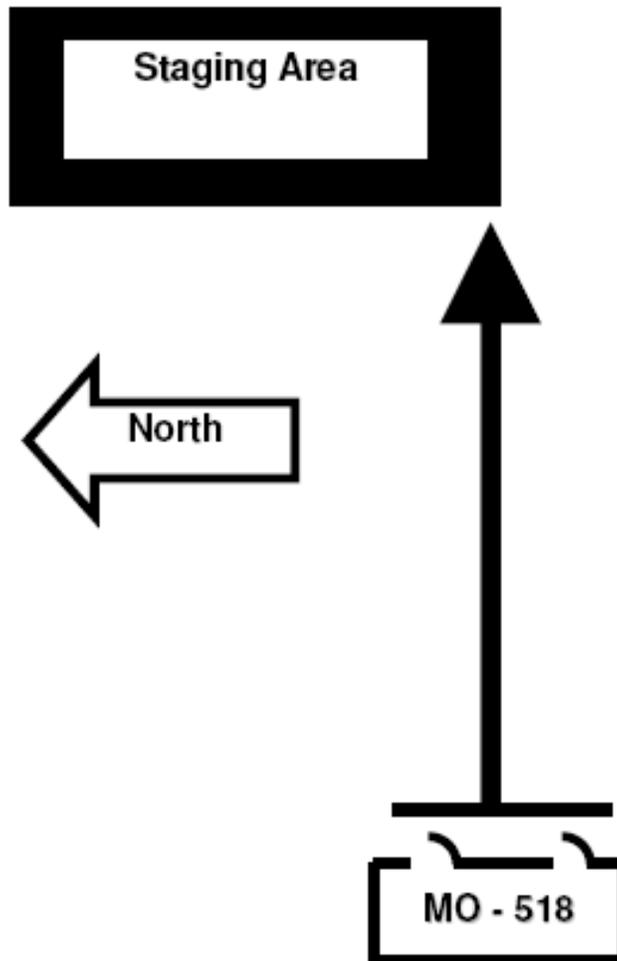


Figure J.1. Evacuation Routes

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