

**SECTION 6**

**PROCEDURES TO PREVENT HAZARDS**

**MIXED WASTE FACILITY  
RCRA/TSCA PERMIT APPLICATION**

**PERMA-FIX NORTHWEST RICHLAND, INC.**

**RICHLAND, WASHINGTON**

# Mixed Waste Facility

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Attachment 6-1	Example Inspection Forms
Attachment 6-2	Subpart BB Monitoring Program Manual

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## **6.0 PROCEDURES TO PREVENT HAZARDS [F]**

*[WAC 173-303-806(4)(a)(iv), (v), (vi), (viii), (xi), WAC 173-303-310, WAC 173-303-320, WAC 173-303-340, 40 CFR 270.14(b)(4), (5), (6), (8), 40 CFR 264.14, 40 CFR 264.15, 40 CFR 264.17, 40 CFR 264.30 - .35]*

This section discusses security; inspection schedules; preparedness and prevention requirements; preventive procedure, structures, and equipment; and prevention of reaction of ignitable and reactive wastes stored and treated at the Mixed Waste Facility (MWF).

The MWF is designed and operated to minimize exposure of the general public and operating personnel to waste. Shielding, control of toxic or dangerous material, safety and security procedures, and structures are utilized for this purpose.

### **6.1 Security [F-1]**

*[WAC 173-303-806(4)(a)(iv), WAC 173-303-310(1), (2), 40 CFR 270.14(b)(4), 40 CFR 264.14]*

This section describes the procedures, structures, and equipment for the areas in which dangerous wastes are stored or treated.

#### **6.1.1 Security Procedures and Equipment [F-1a]**

*[WAC 173-303-806(4)(a)(iv), WAC 173-303-310(2), 40 CFR 270.14(b)(4), 40 CFR 264.14]*

The entire MWF is located on the southeast corner of Logston and Battelle Boulevards in Richland, Washington on a 45-acre site. The MWF access is controlled by physical barriers, which complies with WAC 173-303-310(2)(c). There is a fence that surrounds the entire property and an additional fence that surrounds the Radiological Control Area (RCA). Mixed waste operations include treatment and storage (Building 13) and loading and unloading areas. Treatment and storage activities do not take place at the Rail Loading Area (RLA) or the Truck Loading Area (TLA). The RLA is located within the property fence, but outside of the RCA. The TLA and Building 13 are within the RCA. Access into the RCA where wastes are stored or treated is controlled by gates in the facility and RCA fences. The RCA may also be accessed by entering Building 17. This is an administrative building which, during operation hours, is staffed by employees. Building 17 is locked after hours. In addition, one must pass through the facility gate in order to gain access to Building 17. There is a guard building at the facility fence gate. Signs stating, "Danger-Unauthorized Personnel Keep Out", or equivalent language, legible at 7.6 meters (25 feet) or more, are posted on the RCA fence and near the entrances of the RCA and Building 13.

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## **6.1.2 Waiver [F-1b]**

*[WAC 173-303-310(1), 40 CFR 270.14(a)]*

The MWF is not requesting waiver of the security procedures and equipment requirements. Therefore this subsection is not applicable.

## **6.2 Inspection Plan [F-2]**

*[WAC 173-303-806(4)(a)(v), WAC 173-303-320, WAC 173-303-340, 40 CFR 270.14(b)(5), 40 CFR 264.15]*

This section describes the methods and schedule for inspection of the MWF. The purpose of inspections is to identify; leaking containers or tanks, improperly stored containers, and degradation of containment and safety and emergency equipment and/or systems. These inspections help to ensure that situations do not exist that might cause or lead to the release of waste to the environment or that might pose a threat to human health. Abnormal conditions identified by inspections are corrected in accordance with WAC 173-303-320(3).

### **6.2.1 General Inspection Requirements [F-2a]**

*[WAC 173-303-806(4)(a)(v), WAC 173-303-320, WAC 173-303-340, 40 CFR 270.14(b)(5), 40 CFR 264.15, 40 CFR 264.33 - .35]*

The MWF inspections are performed by qualified personnel. Inspections are documented on inspection checklists / log sheets. Inspection schedules and documentation are maintained at the facility site. The inspection checklist consists of a listing of items that are to be assessed during each inspection. Any problems identified during the inspection are reported to the appropriate MWF Supervisor.

Inspections of the active MWF areas and containers are conducted to detect any signs of malfunction, deterioration, discharges, or other anomalies. Specific items and/or problems to be noted during routine storage area inspections include the following:

- Condition of concrete floor, curbing and walls
- Appropriate safety equipment
- Container integrity
- Containers closed
- Significant corrosion of containers
- Evidence of spills or leaks
- Containers labels and markings in place, legible, and unobscured
- Appropriate aisle spacing between rows of containers.

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Inspections take place when an area or equipment is in use and the MWF is operating. The routine inspections are conducted on a daily, weekly, monthly, quarterly and annual basis based on the type of unit or equipment involved. More frequent inspections may be conducted based on current operating conditions. Areas subject to spills are inspected daily when in use (for example when in the process of receiving waste or transferring waste out.) The written inspection schedule is provided in Table 6-1.

**Table 6-1 Inspection Schedule Summary**

<b>Frequency</b>	<b>Inspection Type</b>	<b>Form</b>
Daily (when in use)	General Facility	Daily Inspection Checklist
	Tank System Operation	Daily Inspection Checklist
	Unloading and Loading Areas	Daily Inspection Checklist
	Container Storage (leaks, spills, accumulated liquids, labels)	Daily Inspection Checklist
	Monitoring Equipment	Daily Inspection Checklist
Weekly (at least every 7 days)	Perimeter and General Facility	Weekly Inspection Checklist
	Security Devices	Weekly Inspection Checklist
	Eye Washes and Safety Showers	Weekly Inspection Checklist
	Container Storage (structural integrity, secondary containment)	Weekly Inspection Checklist
	Monitoring Equipment (when in use)	Weekly Inspection Checklist
	Pumps Subject to Subpart BB	BB Equipment Compliance Summary and Monitoring Log Sheet
Monthly (at least every 30 days)	Safety and Emergency Equipment	Monthly Inspection Checklist
	Preparedness and Prevention Equipment (drains, sumps, backup power)	Monthly Inspection Checklist
	Fire Equipment	Monthly Inspection Checklist
Quarterly	First Aid Equipment and Spill Kits	Quarterly Inspection Checklist

In addition, periodic tank integrity inspection/assessments will be performed in accordance with the engineering standard used to design and construct the tanks and/or the recommendation of a qualified professional engineer.

### **6.2.2 Inspection Log [F-2b]**

*[WAC 173-303-320(2)(d), 40 CFR 264.15]*

Example inspection logs, example forms and additional information are provided in this section. The inspection logs and forms will be updated as necessary if equipment is added or removed from service. Inspection records are maintained for at least five years from the date of the inspection in accordance with WAC 173-303-320(2)(d), and contain, at a minimum, the following information;

- Date and time of inspection,

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- Printed name and the handwritten signature of the inspector
- Notation of the observations made
- Account of spills or discharges, and
- Date and nature of any repairs or remedial actions taken.

### 6.2.3 Schedule for Remedial Actions for Problems Revealed [F-2c]

*[WAC 173-303-320(3), 40 CFR 264.15(c)]*

In general, hazards to human health or the environment (such as tanks or containers with significant leaks) should be remedied immediately. If inspections identify leaks, and/or spills into the secondary containment, the resultant material should be removed as soon as reasonably possible, and for tank systems, within 24 hours from detection of the problem. Table 6-2 provides the required implementation schedule for corrective action for several types of problems, including major categories of problems. Inspectors are responsible for notifying the appropriate manager of the need for corrective action. The manager is then responsible for assigning personnel to perform the necessary corrective action and ensuring the work is completed. In addition, if any employee observes an abnormal condition, that employee must notify his/her manager.

**Table 6-2 Corrective Action Implementation Schedule**

Major Problem Classification	Specific Corrective Actions	Implementation Schedule
<b>CONTAINERS</b>		
Container Leak	Stop leak, if possible, by tightening container closure or by using plug or patch materials to seal container	Immediately
	Overpack, if necessary, (marked and labeled in same manner as contents, noting condition of container inside)	As soon as possible
	Segregate leaking containers	As soon as possible
	Build containment of sorbent materials, if appropriate	Immediately
	Restrict access, if appropriate	Immediately
	Trained HAZMAT personnel to clean up any spillage, place wastes generated in properly labeled containers, and transfer remaining contents of original container to non-leaking container(s) if original container not usable or repairable.	Within 24 hours
	Report hazardous material releases in accordance with the Contingency Plan	As required by the Contingency Plan

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**Table 6-2 Corrective Action Implementation Schedule (continued)**

Major Problem Classification	Specific Corrective Actions	Implementation Schedule
<b>TANKS</b>		
Tank Leak	Shut down any related process operations	Immediately
	If necessary, stop flow into system using manual override valves	Immediately
	Tighten fittings and closures related to the leakage	Immediately
	Use plug or patch material to seal tank leak	Immediately
	Restrict access, if appropriate	Immediately
	Trained HAZMAT personnel to clean up any spillage captured by secondary containment; wastes from spillage cleanup are to be transferred to properly labeled containers	Within 24 hours of detection
	Transfer remaining contents of the tank to a non-leaking tank or to labeled containers if the tank is not readily repairable	Within 24 hours or as required by the Contingency Plan
	Report hazardous material releases in accordance with the Contingency Plan	As soon as possible or as required by the Contingency Plan
	Certify major repairs before system is returned to service	As required
<b>CONTAINMENT AREAS</b>		
Containment System Loss of Integrity	Fill in any major floor cracks or gaps	Immediately, unless waste can be removed from the area
	Make any necessary curbing or berming repairs	
	Remove any accumulated spills according to schedule outlined above	
	For container storage, verify and maintain proper container storage and spacing	
<b>SUBPART BB CORRECTIVE ACTIONS</b>		
	Leaks in equipment subject to Subpart BB will be repaired according to the schedule in Attachment 6-2, "Subpart BB Monitoring Program Manual."	

### 6.2.4 Specific Process or Waste Type Inspection Requirements [F-2d]

#### 6.2.4.1 Container Inspections [F-2d(1)]

[WAC 173-303-806(4)(a)(v), WAC 173-303-630(3) and (6), WAC 173-303-320(2)(c) and (3), 40 CFR 270.14(b)(5), 40 CFR 264.15(c), 40 CFR 264.174]

Inspections take place when an area or equipment is in use and the MWF is operating. When containers are in storage areas, the containers and container storage areas will be inspected for leaks, spills and accumulated liquids and to ensure container labels are not obscured, removed or otherwise unreadable. When containers are in storage areas, the containers and container storage areas will be inspected weekly for deterioration of containers and the secondary containment system including: cracks or deterioration of coatings, sealants or foundations. Areas and items of inspection are detailed on the example Inspection

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Checklist forms included at the end of this section. Any deficiencies will be documented on the inspection log/checklist and the appropriate manager will be notified. The schedule for addressing deficiencies is included as Table 6-2, Corrective Action Implementation Schedule.

When in use, unloading and loading areas will be visually inspected daily. Cracks, staining, residues, and any evidence of a spill or leak will be noted. Spills will be addressed in accordance with the procedures described in the Contingency Plan. In addition, the Rail Loading Area and Truck Loading area will also be inspected daily for any accumulated liquids. Any accumulated liquid greater than the one (1) inch mark on the containment wall shall be removed. Accumulated liquids from rainfall or precipitation will be inspected for the presence of an oily sheen. Liquids with an oily sheen shall be removed from the containment system and characterized for disposal. Liquids removed that do not have an oily sheen will be sampled for radioactive components and verified that the results are less than the "Investigation and Action Levels" for Environmental Water shown in Low-level Operating Procedure 217 Environmental Data Review and Reporting prior to discharging the liquid to the ground. Any accumulated liquids with sample results that are greater than or equal to the "Investigation and Action Levels" for Environmental Water in Low-Level Operating Procedure 217 will be characterized for disposal.

### *6.2.4.2 Tank System Inspections and Corrective Actions [F-2d(2)]*

*[WAC 173-303-640(6) and (7), 40 CFR 270.14(b)(5), 40 CFR 264.195]*

#### 6.2.4.2.1 Tank System Inspections [F-2d(2)(a)]

*[WAC 173-303-806(4)(a)(v), WAC 173-303-640(6), 40 CFR 264.195]*

The tank systems are inspected at least once each operating day. Areas and items of inspection are detailed on the example Inspection Checklist forms included at the end of this section. Items inspected daily of permitted tanks storing hazardous waste include overfill controls, exterior surfaces of each tank and the surrounding areas to detect corrosion, and to ensure that there exists no evidence of leaks or releases or the potential for possible leaks or releases. The inspector shall inspect the tank areas for problems such as discolored surface appearance, corrosion, leaks, peeling paint, or pooled or running liquid. The inspector shall visually check the welds, seams, and fixtures of valves, pipes, and ancillary equipment of each facility tank storing hazardous waste to ensure that there is no evidence of corrosion or leaking.

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Periodic tank integrity inspection and assessments will be performed in accordance with the engineering standard used to design and construct the tank and/or the recommendation of a qualified professional engineer.

### 6.2.4.2.2 Tank Systems – Corrective Actions [F-2d(2)(b)]

*[WAC 173-303-640(7), 40 CFR 264.196]*

The corrective actions taken to ensure that a tanks system is removed from service immediately when there has been a leak or spill from it or the system is unfit for use are described in Table 6-2, Corrective Action Implementation Schedule. These actions include and demonstrate:

- The flow of waste into the system will be stopped
- Waste will be removed from the containment system within 24 hours
- Visible releases into the environment will be contained
- Non-exempted spills will be reported as required
- The system will be repaired
- Major repairs will be certified before the tanks system is returned of service

### *6.2.4.3 Storage of Ignitable and Reactive Wastes [F-2d(3)]*

*[WAC 173-303-806(4)(a)(v), WAC 173-303-395(1)(d)]*

Ignitable and reactive wastes may be stored in containers or tanks. The containers and tanks are compatible with the contained wastes. Dangerous waste containers with reactive or ignitable hazards classifications will be stored in specially designed cabinets and racks. The cabinets are equipped with proper OSHA safety equipment, secondary containment, and National Fire Protection Agency (NFPA)-approved fire protection systems. Several precautions have been taken to eliminate potential sources of ignition. Open flames, smoking, sparking devices, cutting and welding are prohibited from these areas. Smoking is not allowed inside the MWF. “No smoking” signs are conspicuously placed throughout the facility. “Hot work permits” are required prior to cutting and welding in these areas to prevent these wastes from being exposed to ignition sources. Wastes are tested for compatibility prior to commingling, e.g., being added to a tank containing other wastes.

The areas where ignitable and reactive wastes are stored will be inspected annually. This inspection will be performed by a facility employee familiar with the International Fire Code, or will be conducted in the presence of the local, state, or federal fire marshal if possible. If the inspector is an employee of the MWF, his/her training record will document the training received to be familiar with the International Fire Code. Each annual inspection will document the date and time of inspection, the name of the

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inspector/fire marshal, a notation on any observations made, and any remedial actions taken as a result of the inspection.

### *6.2.4.4 Air Emissions Control and Detection – Inspections, Monitoring, and Corrective Actions [F-2d(4)]*

*[WAC 173-303-806(4)(a)(v), 40 CFR 270.14(b)(5), 40 CFR 264.1033(e) – (k), 40 CFR 264.1035, 40 CFR 264.1052, 40 CFR 264.1053, 40 CFR 264.1058, 40 CFR 264.1064, 40 CFR 264.1067, 40 CFR 264.1088, 40 CFR 264.1091]*

#### 6.2.4.4.1 Subpart AA Process Vents [F-2d(4)(a)]

*[WAC 173-303-806(4)(a)(v), 40 CFR 264.1033, 40 CFR 264.1034(b) and (c), 40 CFR 264.1035(b)(3), (b)(4) and (c)]*

There are no affected vents at the MWF that are subject to Subpart AA. Therefore, this subsection is not applicable.

#### 6.2.4.4.2 Subpart BB Equipment Leaks [F-2d(4)(b)]

*[WAC 173-303-806(4)(a)(v), 40 CFR 264.1052 – 264.1064]*

Pursuant to the requirements of 40 CFR 264.1050, the air emissions standards for equipment leaks apply to any equipment at the facility that contains or comes in direct contact with hazardous waste with organic chemical concentrations of 10% by weight or higher. Additional information regarding Subpart BB inspections is contained in Attachment 6-2 to this section titled, Subpart BB Monitoring Plan Manual, herein referred to as the BB Manual.

The following locations within the MWF may be subject to this section.

- The piping connecting the Thermal Desorber condensate from the thermal chamber to the Condensate Tank.

For Subpart BB compliance purposes, it is assumed that the equipment associated with these processes subject to Subpart BB monitoring requirements are in light liquid service. The monitoring requirements for equipment in light liquid service are sometimes more demanding than for equipment in heavy liquid service. The associated inspection log sheets will be updated if required as certain equipment is used for heavy liquid service.

The MWF has identified and marked each piece of existing equipment to which the equipment leak standards apply. Proposed equipment will be marked after installation. Equipment subject to Subpart BB is shown drawings Subpart BB Equipment for the Thermal Desorber System. Equipment will be

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inspected; leaking equipment will be tagged; and repairs or replacement will be attempted and completed according to the BB Manual.

All detected leaks will be repaired as soon as practicable, but not later than 15 days after detection unless the following conditions arise:

- The repair is not technically feasible without shutdown of a hazardous waste management unit. In such a case, the leak repair will be completed before the end of the next shutdown of the hazardous waste management unit.
- The leaking equipment is isolated and does not continue to contain or contact hazardous waste with an organic concentration of at least 10% by weight.
- The emissions resulting from immediate repair of a leaking valve would be greater than the emissions likely to result from delay of repair.
- The repair of a leaking pump requires the use of a dual mechanical seal system, which includes a barrier fluid system. In such a case, the repair will be completed as soon as practical, but no later than six months after leak detection.

The facility will record and maintain the information required by 40 CFR 264.1064 and described in the BB Manual. The facility will submit reports required by 40 CFR 264.1065 and described in the BB Manual.

### 6.2.4.4.3 Subpart CC Air Emission Standards for Tanks and Containers [F-2d(4)(c)]

*[WAC 173-303-692, 40 CFR 270.14(b)(5), 40 CFR 270.27(a) (6), 40 CFR 264.1088, 40 CFR 264.1091]*

Waste management unit that is used solely for the management of radioactive mixed waste in accordance with all applicable regulations under the authority of the Atomic Energy Act and the Nuclear Waste Policy Act is exempted from the requirements of this subpart by WAC 173-303-692(1)(b)(vi). All hazardous wastes managed at the MWF are radioactive mixed waste and are managed in accordance with these acts. Therefore this subsection is not applicable.

### *6.2.4.5 Waste Pile Inspection [F-2d(5)]*

The permitting of waste piles is not requested in this application. Therefore, this subsection is not applicable.

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### *6.2.4.6 Surface Impoundment Inspection [F-2d(6)]*

The permitting of surface impoundments is not requested in this application. Therefore, this subsection is not applicable.

### *6.2.4.7 Incinerator Inspection [F-2d(7)]*

The permitting of incinerators is not requested in this application. Therefore, this subsection is not applicable.

### *6.2.4.8 Landfill Inspection [F-2d(8)]*

The permitting of landfills is not requested in this application. Therefore, this subsection is not applicable.

### *6.2.4.9 Land Treatment Facility Inspection [F-2d(9)]*

The permitting of land treatment is not requested in this application. Therefore, this subsection is not applicable.

## **6.3 Preparedness and Prevention Requirements [F-3]**

*[WAC 173-303-806(4)(a)(vi), WAC 173-303-340, 40 CFR 270.14(b)(6), 40 CFR 264 Subpart C]*

This subsection describes the preparedness and prevention measures taken at the MWF to help avoid or mitigate the possibility of a fire, explosion or unplanned release of dangerous waste that could threaten human health or the environment. MWF emergency equipment and procedures are described in the Contingency Plan.

### **6.3.1 Equipment Requirements [F-3a]**

*[WAC 173-303-340(1) and (2), 40 CFR 264.32, 40 CFR 264.34]*

Groups or individuals working in any of the MWF mixed waste storage or treatment unit areas may communicate by two-way radio, land line phone, or cell phone. These communication devices are capable of providing immediate emergency instructions to facility personnel.

The MWF does not have a public address system. However, the MWF has installed communication and alarm systems. Cellular telephones are used throughout the MWF, and a central evacuation alarm is

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installed at the MWF. The central evacuation alarm can be heard in most of the areas within the MWF. However, there are several high-noise areas (certain activities and building ventilation rooms) that will require supervisor(s) or their designee to sweep those areas to ensure that all personnel are evacuated.

The MWF is equipped with equipment for summoning emergency assistance from the Richland Fire Department, the Hazardous Material Response Team, and/or the Richland Police Department as necessary. This includes the land line telephone communication system, fire alarm pull boxes, cell phones, and two-way portable radios.

Telephones, two-way portable radios, and cell phones are available in the Administration Building (Building 17), and they may be used to summon emergency assistance from the outside of the RCA or the MWF. The locations of external communication equipment, other emergency equipment, and the primary staging area are identified in the Contingency Plan. Personnel are trained in the use of emergency equipment as described in the Training Plan.

The MWF does not have a fire sprinkler system. Appropriately classed and sized fire extinguishers are in or near all areas that store or treat ignitable and/or reactive waste. The locations of fire extinguishers and other equipment such as spill control kits and eye wash stations are shown on drawing DWG-MW-GA-004. In addition, a fire alarm system has been installed in accordance with applicable fire codes. Fire detection and annunciation equipment is shown on drawing DWG-MW-GA-003. Smoke and heat detector locations are shown on drawing DWG-MW-GA-002.

The MWF relies primarily on the Richland Fire Department to respond to fires and other emergencies as described by the Contingency Plan. The Richland Fire Department is capable of providing rapid response to fires within the MWF.

Wastes that are incompatible with the use of water for fire control are stored in the hazardous materials (HAZMAT) cabinets in Room WSB-4 and Room SB-02. The HAZMAT cabinets use a suppression gas to extinguish fires. The HAZMAT cabinets and HAZMAT cabinet doors are rated to withstand a two (2) hour and hour and half (1.5) credible fire scenario, respectively.

### **6.3.2 Aisle Space Requirements [F-3b]**

*[WAC 173-303-340(3), 40 CFR 264.35]*

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Aisle spacing between waste in the MWF is sufficient to allow the unobstructed movement of personnel, fire protection, spill control, and decontamination equipment to any area of the facility in an emergency. Aisle space allows sufficient room for movement of personnel and fire protection equipment in and around the containers, as necessary.

The emergency equipment described in this subsection is for the MWF Building 13.

### **6.4 Preventive Procedures, Structures, and Equipment [F-4]**

*[WAC 173-303-806(a)(viii), 40 CFR 270.14(b)(8)]*

Loading and unloading operations requirements of WAC 173-303-395(4) apply to MWF because liquid mixed wastes are accepted into and shipped off-site from the facility. The loading and unloading of liquid mixed waste and wastes that may contain some liquids are only managed within MWF Building 13 or on the RLA or TLA. Unloading of containerized waste will typically occur using fork-lift trucks. On occasion, cranes may be used to load/unload unique waste containers.

Building 13, the RLA and the TLA are completely surrounded by curbs that provide secondary containment. Decontamination activities of transport vehicles and loading/unloading equipment (e.g., fork lift trucks) does not involve the generation of large quantities of wash water. Finally, the design and construction of the building floors and curbs does allow for the removal, as soon as possible, of any spills, leaks, and equipment cleaning liquids. Section 4, Process Description, contains information on run-off and run-on of liquid at the MWF.

Fire hydrants are available for use in the major areas of the RCA and the MWF. However, it is not expected that water would come into contact with ignitable and/or reactive waste container storage or treatment areas.

Loss of electrical power does constitute an emergency situation regarding the storage and treatment of mixed waste at the MWF. Critical systems are supplied with backup power via emergency diesel generators that automatically start when there is a failure of the normal power supply. Indoor waste storage and treatment areas are not automatically evacuated since the backup power is routed to the ventilation systems. A loss of backup power due to failure of emergency generators is not an immediate emergency situation since personnel are trained in respiratory protection. Evacuation of the MWF due to

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a complete loss of ventilation would be determined on a case-by-case basis. Personnel protection equipment available for use at the MWF is discussed in the Contingency Plan.

### **6.5 Prevention of Reaction of Ignitable, Reactive, and/or Incompatible Waste [F-5]**

*[WAC 173-303-806(4)(a)(ix), (b)(v) and (c), WAC 173-303-395(1)(a), (b) and (c), WAC 173-303-630(9)(a) and (b), WAC 173-303-640(9) and (10), 40 CFR 270.14(b)(9), 40 CFR 264.17(a) and (b), 40 CFR 264.177(a) and (b)]*

The MWF does treat and/or store ignitable, reactive, and/or incompatible dangerous wastes. This subsection describes the precautions to prevent the accidental ignition or reaction of these wastes.

#### **6.5.1 Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Wastes [F-5a]**

*[WAC 173-303-806(4)(a)(ix), WAC 173-303-395(1)(a), and (c), 40 CFR 270.14(b)(9), 40 CFR 264.17(a)]*

The waste stored in the MWF is stored in closed containers. Activities involving heat generation (welding, cutting, open flames, hot surfaces, frictional heat, sparks, or radiant heat) are only allowed in specific areas of the MWF. These activities are controlled via hot work procedures. Documentation of each hot work activity is placed into the facility operating record.

Smoking is prohibited within the MWF buildings and the RCA. "NO SMOKING" signs are posted at the entrances to the Administration Building and are visible at 7.6 meters (25 feet).

#### **6.5.2 Precautions for Handling Ignitable or Reactive Waste and Mixing Incompatible Wastes [F-5b]**

*[WAC 173-303-806(4)(a)(ix), (b)(v) and (c)(x), WAC 173-303-395(1)(b) and (c), WAC 173-303-630(9)(a) and (b), WAC 173-303-640(9) and (10), 40 CFR 270.14(b)(9), 40 CFR 264.17(b), 40 CFR 264.177(a) and (b)]*

##### *6.5.2.1 Ignitable or Reactive Wastes In Tanks [F-5b(1)]*

*[WAC 173-303-806(4)(c)(x), WAC 173-303-640(9), 40 CFR 270.16(j), 40 CFR 264.198]*

Ignitable or reactive waste and mixing of incompatible waste is controlled predominately by segregating these wastes within the storage area and treatment areas.

Ignitable wastes will be stored and processed with compatible material. Ignitable waste will be stored in such a way that it is protected from any material or condition that may cause the waste to ignite. The waste will be stored away from ignition sources when in any open area. "Danger-No Smoking, No Open

## *Mixed Waste Facility*

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Flames” (or similar) signs are posted prominently. Smoking is not permitted within the MWF. During maintenance operations, tanks will be grounded to protect against sparking.

The potential for mixing of incompatible wastes during storage and treatment is minimized because of segregation of storage in the HAZMAT cabinets and dedicated treatment units.

### *6.5.2.2 Incompatible Wastes In Containers or Tanks [F-5b(2)]*

*[WAC 173-303-806(4)(c)(x), WAC 173-303-640(9), 40 CFR 270.16(j), 40 CFR 264.198]*

Water-reactive and incompatible waste is containerized and segregated. Precautions include storage in the HAZMAT cabinets to ensure that water-reactive and incompatible wastes are segregated. The fire suppression systems associated with HAZMAT cabinets do not contain water.

Reactive wastes identified in WAC 173-303-090(7)(a)(vii) and (viii) will not be accepted at the MWF. However, wastes with other reactive characteristics will be accepted by the MWF. Compatibility testing described in the WAP will be used to determine what reactive wastes can be consolidated. Tanks previously containing reactive wastes will not be used to store incompatible wastes until at least one waste, compatible with both wastes is stored in the tank, or the tank has been appropriately cleaned and/or rinsed.