

AMWTP HWMA/RCRA Permit

FOR THE

IDAHO NATIONAL LABORATORY

ATTACHMENT 7

Section G

Contingency Plan

Revision Date: June 2018

TABLE OF CONTENTS
ATTACHMENT 7
CONTINGENCY PLAN

G-1 General Information.....	1
G-2 Emergency Coordinators	2
G-3 Implementation.....	3
G-4 Emergency Response Procedure.....	3
G-4a Notification	3
G-4b Identification of Hazardous Materials	4
G-4c Assessment	5
G-4d Control Procedures 40 CFR 264.52(a)	6
G-4e Prevention of Recurrence or Spread of Fires, Explosions, or Releases.....	7
G-4f Storage and Treatment of Released Materials.....	8
G-4g Incompatible Waste 40 CFR 264.56(h)(1)	9
G-4h Post-Emergency Equipment Maintenance.....	9
G-4i Container Spills and Leakage 40 CFR 264.52, 264.171, and 264.175(b)(5).....	10
G-5 Emergency Equipment 40 CFR 264.52(e).....	12
G-6 Coordination Agreements 40 CFR 264.52(c) and 264.37	16
G-7 Evacuation Plan 40 CFR 264.52(f).....	17
G-8 Required Reports	28

LIST OF TABLES

Table G-1. Emergency Equipment for the MWMUs.....	13
---	----

LIST OF EXHIBITS

Exhibit G-1. AMWTP Evacuation Routes.....	18
Exhibit G-2. WMF-634 Evacuation Routes.....	19
Exhibit G-3. Type II Module Evacuation Routes	20
Exhibit G-4. Type I Module Evacuation Routes.....	21
Exhibit G-5. SWEPP Evacuation Routes.....	22
Exhibit G-6. WMF-676 First Floor Evacuation Routes.....	23
Exhibit G-7. WMF-676 Second Floor Evacuation Routes	24
Exhibit G-8. WMF-676 Penthouse/Roof Evacuation Routes	25
Exhibit G-9. WMF-636 Pad 2 Evacuation Routes.....	26
Exhibit G-10. AMWTP Outside Storage Area Evacuation Routes	27

<p style="text-align: center;">AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p style="text-align: center;">COMPLIANCE METHODOLOGY</p>
<p>G-1 General Information</p> <p>40 CFR 264.51 Purpose and implementation of contingency plan.</p> <p>(a) Each owner or operator must have a contingency plan for his facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.</p> <p>(b) The provisions of the plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.</p> <p>40 CFR 264.53 Copies of contingency plan.</p> <p>A copy of the contingency plan and all revisions to the plan must be:</p> <p>(a) Maintained at the facility; and</p> <p>(b) Submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.</p>	<p>G-1 General Information</p> <p>This HWMA/RCRA Contingency Plan discusses emergency response for the MWMUs. Emergency actions addressed include protection of human health, the environment, and RWMC/AMWTP buildings and equipment in an event originating from or affecting the MWMUs. The “ICP Emergency Plan/RCRA Contingency Plan – Addendum 2” contains the implementing documents for emergency response for the AMWTP and is written to comply with requirements that are in addition to those of HWMA/RCRA. This Contingency Plan provides the HWMA/RCRA requirements that are being implemented through the “ICP Emergency Plan/RCRA Contingency Plan – Addendum 2”.</p> <p>The Contingency Plan addresses the actions to be taken to protect human health and the environment at the MWMUs, in the event of an emergency. When implemented, the Contingency Plan is designed to minimize the hazards from fires, explosions, or any unplanned significant release of MW, or chemical constituents of the waste to the air, soil, surface water, or groundwater. The Contingency Plan provides for emergency procedures, identifies authorities and responsibilities of emergency response personnel and organizations, and identifies the manpower, equipment, and specialized services that are available to manage an emergency situation.</p> <p>The Contingency Plan is maintained, at a minimum, at the RWMC ECC office and as part of the AMWTP HWMA/RCRA Permit at the AMWTP.</p> <p>The Contingency Plan applies to all AMWTP personnel who are assigned to the MWMUs, support personnel who work at the MWMUs, or personnel who are providing assistance during an emergency. The plan also applies to visitors.</p> <p>At a minimum, the Contingency Plan is amended, if necessary, whenever:</p> <ul style="list-style-type: none"> • The HWMA/RCRA permit is modified; • The plan fails in an emergency; • The design, construction, operation, maintenance, or other circumstances involving a MWMU changes, in a way that materially increases the potential for fires, explosions, or significant releases of MW or waste constituents, or changes the response necessary in an emergency; • The list of Emergency Coordinators (ECs), commonly referred to as the Emergency Action Manager (EAM), changes; or • The list of emergency equipment changes. <p>General descriptions of the activities occurring in the MWMUs are provided in 7 Attachments 1.A, 1.B, 1.C, 1.D, 1.E, 1.F, 1.G, 1.H, 1.H.i, 1.H.ii, 1.H.iii, and 1.H.iv.</p>

<p align="center">AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p align="center">COMPLIANCE METHODOLOGY</p>																																																																	
<p>G-2 Emergency Coordinators</p> <p>CFR 40 264.52 Content of contingency plan.</p> <p>(d) The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see CFR 40 264.55), and this list must be kept up to date. 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, this information must be supplied to the Regional Administrator at the time of certification, rather than at the time of permit application.</p>	<p>G-2 Emergency Coordinators</p> <p>The Emergency Action Managers (EAMs) listed below are the Emergency Coordinators (ECs) for purposes of HWMA/RCRA compliance with respect to the contingency plan.</p> <p>Due to the shift-work structure and remoteness of the AMWTP, it is not possible or practical for one individual to assume “primary” responsibilities. Rather, responsibility is best assigned through “redundant primary” EAMs. The EAM is at the AMWTP at all times or on call. When on call, the EAM must be available to respond to emergencies by reaching the facility within a short period of time. If an incident overlaps more than one shift, the active EAM shall maintain the command until responsibility is officially passed to the oncoming EAM.</p> <p>Names, home addresses, and phone numbers of the RWMC EAMs are as follows:</p> <table border="1" data-bbox="646 793 1533 1640"> <thead> <tr> <th>Name</th> <th>Home Address</th> <th>Work Phone</th> <th>Cell Phone</th> <th>Home Phone</th> </tr> </thead> <tbody> <tr> <td>J. S. Shokes</td> <td>175 Abraham Street Chubbuck, ID 83202</td> <td>533-0424</td> <td>241-4930</td> <td>241-4930</td> </tr> <tr> <td>M. F. Fogarty</td> <td>4019 Nathan Drive Idaho Falls, ID 83404</td> <td>533-6508</td> <td>680-0773</td> <td>542-1372</td> </tr> <tr> <td>M. R. Loftus</td> <td>1487 Mountain View, Apt #1 Idaho Falls, ID 83402</td> <td>557-7222</td> <td>270-9775</td> <td>523-6532</td> </tr> <tr> <td>J. Bottles</td> <td>970 N. Yellow Pine Dr. Idaho Falls, ID 83401</td> <td>533-0608</td> <td>406-9349</td> <td>406-9349</td> </tr> <tr> <td>N. N. Loftus*</td> <td>1460 N. Marchesa Ln. Idaho Falls, ID 83402</td> <td>533-6464</td> <td>351-2085</td> <td>520-0856</td> </tr> <tr> <td>R. D. Langseth</td> <td>830 Grand Ave, Arco, Idaho 83213</td> <td>533-0135</td> <td>589-0338</td> <td>589-0338</td> </tr> <tr> <td>S. L. Lopez</td> <td>2460 Brookcliff Dr. Idaho Falls, ID 83402</td> <td>533-0585</td> <td>520-1484</td> <td>520-1484</td> </tr> <tr> <td>J. L. Southwick</td> <td>5117 Dagger Falls Dr. Idaho Falls, ID 83406</td> <td>533-0412</td> <td>520-1484</td> <td>522-2772</td> </tr> <tr> <td>B. F. Breffle</td> <td>4025 Woodhaven Lane Idaho Falls, ID, 83404</td> <td>533-0683</td> <td>351-1660</td> <td>351-1660</td> </tr> <tr> <td>A. N. Loftus*</td> <td>731 Emery Ln. Idaho Falls, ID 83401</td> <td>533-0524</td> <td>680-3060</td> <td>680-3060</td> </tr> <tr> <td>T.P. Griffith*</td> <td>367 Ruth Avenue Idaho Falls, ID 83401</td> <td>533-6347</td> <td>970-2470</td> <td>522-3407</td> </tr> <tr> <td>R. B. DeMott*</td> <td>2200 Riverstone Way Idaho Falls, ID 83404</td> <td>533-3265</td> <td>821-6218</td> <td>881-1438</td> </tr> </tbody> </table> <p>* Alternate EAM</p> <p>The business address (1580 Sawtelle Street, Idaho Falls, Idaho 83402) is the same for all the EAMs. The EAM list above is subject to change due to changes in personnel. The current list of EAMs is maintained in Appendix I of the ICP EP/RCRA CP.</p>	Name	Home Address	Work Phone	Cell Phone	Home Phone	J. S. Shokes	175 Abraham Street Chubbuck, ID 83202	533-0424	241-4930	241-4930	M. F. Fogarty	4019 Nathan Drive Idaho Falls, ID 83404	533-6508	680-0773	542-1372	M. R. Loftus	1487 Mountain View, Apt #1 Idaho Falls, ID 83402	557-7222	270-9775	523-6532	J. Bottles	970 N. Yellow Pine Dr. Idaho Falls, ID 83401	533-0608	406-9349	406-9349	N. N. Loftus*	1460 N. Marchesa Ln. Idaho Falls, ID 83402	533-6464	351-2085	520-0856	R. D. Langseth	830 Grand Ave, Arco, Idaho 83213	533-0135	589-0338	589-0338	S. L. Lopez	2460 Brookcliff Dr. Idaho Falls, ID 83402	533-0585	520-1484	520-1484	J. L. Southwick	5117 Dagger Falls Dr. Idaho Falls, ID 83406	533-0412	520-1484	522-2772	B. F. Breffle	4025 Woodhaven Lane Idaho Falls, ID, 83404	533-0683	351-1660	351-1660	A. N. Loftus*	731 Emery Ln. Idaho Falls, ID 83401	533-0524	680-3060	680-3060	T.P. Griffith*	367 Ruth Avenue Idaho Falls, ID 83401	533-6347	970-2470	522-3407	R. B. DeMott*	2200 Riverstone Way Idaho Falls, ID 83404	533-3265	821-6218	881-1438
Name	Home Address	Work Phone	Cell Phone	Home Phone																																																														
J. S. Shokes	175 Abraham Street Chubbuck, ID 83202	533-0424	241-4930	241-4930																																																														
M. F. Fogarty	4019 Nathan Drive Idaho Falls, ID 83404	533-6508	680-0773	542-1372																																																														
M. R. Loftus	1487 Mountain View, Apt #1 Idaho Falls, ID 83402	557-7222	270-9775	523-6532																																																														
J. Bottles	970 N. Yellow Pine Dr. Idaho Falls, ID 83401	533-0608	406-9349	406-9349																																																														
N. N. Loftus*	1460 N. Marchesa Ln. Idaho Falls, ID 83402	533-6464	351-2085	520-0856																																																														
R. D. Langseth	830 Grand Ave, Arco, Idaho 83213	533-0135	589-0338	589-0338																																																														
S. L. Lopez	2460 Brookcliff Dr. Idaho Falls, ID 83402	533-0585	520-1484	520-1484																																																														
J. L. Southwick	5117 Dagger Falls Dr. Idaho Falls, ID 83406	533-0412	520-1484	522-2772																																																														
B. F. Breffle	4025 Woodhaven Lane Idaho Falls, ID, 83404	533-0683	351-1660	351-1660																																																														
A. N. Loftus*	731 Emery Ln. Idaho Falls, ID 83401	533-0524	680-3060	680-3060																																																														
T.P. Griffith*	367 Ruth Avenue Idaho Falls, ID 83401	533-6347	970-2470	522-3407																																																														
R. B. DeMott*	2200 Riverstone Way Idaho Falls, ID 83404	533-3265	821-6218	881-1438																																																														

<p>AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p>COMPLIANCE METHODOLOGY</p>
	<p>The RWMC has an ERO that includes the EAM position. The EAM has managerial responsibilities and the technical knowledge of the MWMUs. The EAM is knowledgeable of operational activities at the MWMUs, building controls and equipment, building layout, characteristics of waste being handled, and personnel involved with the MWMUs. The EAM also has the authority to commit the necessary resources to implement the Contingency Plan. This knowledge and leadership, and authority allows the EAM to function quickly and effectively when responding to an emergency incident.</p> <p>The EAM, or designee, is responsible for:</p> <ul style="list-style-type: none"> • Ensuring that the emergency procedures are implemented when responding to any incident involving MW to mitigate or eliminate any immediate or potential hazard to personnel and/or the environment, and • Serving as primary lead in coordinating with the INL Fire Department and Emergency Medical Technician (EMT) Services, INL ERO, and the WCC for the proper support from these organizations.
<p>G-3 Implementation</p> <p>CFR 40 264.52 Content of contingency plan.</p> <p>(a) The contingency plan must describe the actions facility personnel must take to comply with CFR 40 264.51 and CFR 40 264.56 in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.</p>	<p>G-3 Implementation</p> <p>The provisions of the Contingency Plan are implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Minor incidents (those that can be controlled with on-Site resources and do not threaten human health or the environment) are managed by trained personnel according to the provisions of this plan. Such responses are not considered activation of the Contingency Plan.</p>
<p>G-4 Emergency Response Procedure G-4a Notification</p> <p>CFR 40 264.56 Emergency procedures.</p> <p>a) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) must immediately:</p> <p>(1) Activate internal facility alarms or communication systems, where</p>	<p>G-4 Emergency Response Procedure G-4a Notification</p> <p>Regardless of classification, once an event is categorized as an emergency, the EAM (or designated representative) immediately notifies personnel within the affected MWMU of appropriate protective actions by activating the voice paging system, alarm system and/or radio, phone, or by word-of-mouth. During an emergency, the EAM informs the INL WCC of the event typically by using either a phone or two-way radio.</p> <p>Personnel in the MWMU(s) are notified of an emergency either by radio, phone, word-of-mouth or by the evacuation and voice paging system. The paging system consists of a manually activated operator control system connected to RWMC local and global communications and alarms system.</p>

<p align="center">AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p align="center">COMPLIANCE METHODOLOGY</p>
<p>released materials. He may do this by observation or review of facility records or manifests, and, if necessary, by chemical analysis.</p> <p>G-4c Assessment</p> <p>40 CFR 264.56(c) and 264.56(d) 40 CFR 264.56(c) Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions).</p> <p>40 CFR 264.56(d) <i>[The text of 40 CFR 264.56(d) is located in Section G-3, Implementation.]</i></p>	<p>waste types and provides a real time inventory of waste as it is being processed through the MWMUs. The EAM will determine the identity, source, amount, and extent of any released materials. Sources of information include, but may not be limited to:</p> <p>Observations of personnel involved in or discovering the situation,</p> <ul style="list-style-type: none"> • Operating Record, • MSDSs, • Monitoring performed by Industrial Safety/Industrial Hygiene personnel, • Monitoring performed by Radiological Safety personnel, and • INL Fire Department findings and/or report. <p>Measured or estimated radiological/chemical concentrations in air, soil, and water (mainly contaminated fire water at the MWMU) or on surfaces are used to characterize and identify the magnitude of any released MW constituents. Also, monitoring for radiological and chemical hazards may be performed to track any spread of MW constituents. The data may be collected from fixed and/or portable radiation/chemical monitoring instrumentation.</p> <p>G-4c Assessment</p> <p>Pre-incident planning for areas where the potential exists for airborne transuranic hazards has been completed. Firefighters responding to incidents in these areas will be in full protective clothing and self-contained breathing apparatus. Fire Department radiological worker training has been enhanced with emphasis on hazardous radiological conditions and the potential for airborne alpha contamination.</p> <p>Labels indicating the hazards of the wastes being managed in each AMWTP permitted area will be posted at the entrances to those areas. These labels ensure personnel entering a permitted area are aware of the hazards associated with the waste in accordance with the Hazardous Waste Generator Improvements Rule requirements.</p> <p>As feasible, and as safety conditions warrant, information shall be gathered near the scene of the incident to aid in the assessment of an actual or imminent fire, explosion, or significant release of MW so that the appropriate protective actions can be implemented. If required to gather information for the assessment, then individuals entering the affected area will wear appropriate PPE. Typically, the RWMC EAM and supporting personnel gather assessment information, when feasible, from remote locations.</p> <p>Based on conservative estimates of the potential source term(s) at the RWMC, emergency action levels (EALs) have been developed for fires, explosions, radiological releases, and other emergency events. EALs are specific, predetermined, observable criteria used for determining the emergency classification and initial protective actions for emergencies. These EALs provide guidance for activating the INL EROs at the appropriate level in response to an incident. The EALs specify the initial protective actions (e.g., evacuation, take shelter, etc.) to be taken in response to the event.</p>

<p>AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p>COMPLIANCE METHODOLOGY</p>
	<p>The emergency assessment requires determination of hazards involving evaluation of several criteria, including the following:</p> <ul style="list-style-type: none"> • Nature of the accident – Known or probable cause, current/projected status of the affected area, facility conditions, status of containment boundaries/systems, and type(s) and quantities of hazardous waste/material (non-radiological and radiological) involved in the incident. • Weather conditions, present and expected – Wind speed and direction, precipitation, time of day, stability class, weather forecast, anticipated dispersion pattern, direction of travel and width of plume, and locations affected. • Exposure – Magnitude of actual or potential exposure to employees, the general public and the environment, the duration of human and

<p>AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p>COMPLIANCE METHODOLOGY</p>
<p>G-4d Control Procedures 40 CFR 264.52(a)</p> <p>40 CFR 264.52(a) The Contingency Plan must describe the actions facility personnel must take to comply with 264.51 and 264.56 in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.</p>	<p>environmental exposure, and pathways of exposure.</p> <ul style="list-style-type: none"> • Toxicity – Types of adverse health or environmental effects associated with exposures, and the relationship between the magnitude of exposure and adverse effects. • Reactivity – Hazardous materials or waste involved in an incident will be assessed to determine its reactivity and the method(s) for managing such waste. • Effects – Direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control a fire or explosion). • Uncertainties – Considerations for undeterminable or future exposures, and uncertain or unknown health effects including future health effects. <p>If the assessment indicates no real or potential threat to human health or the environment, then the occurrence will be considered a minor incident. Minor incidents do not require further activation of the Contingency Plan.</p> <hr/> <p>G-4d Control Procedures</p> <p>Fire. A fire at the MWMUs may arise from operations involving ignitable MW. A fire may also originate from the ignition of flammable or combustible equipment/fuels and then spread to involve or engulf nearby MW.</p> <p>The MWMUs are constructed and designed to avoid the occurrence of a fire or control a fire if one starts. The MWMUs contain fire suppression systems/equipment, fire/smoke detectors, fire alarm systems, automatic systems for notifying the INL Fire Department, and use of building materials and components that adhere to regulations/codes for fire prevention.</p> <p>Pyrophoric Materials Reaction/Fire in Box Line</p> <p>Because pyrophoric reactions are anticipated and controlled, they do not pose a threat to human health or the environment or the operational integrity of the boxline and will not require activation of the contingency plan. In the event the operational controls are not successful in readily controlling the pyrophoric reaction, necessitating on-site response of the INL Fire Department, the contingency plan will be activated. The contingency plan will also be activated in the event of a fire outside the boxline trough. Other potential fires involving combustible material not associated with the potential pyrophoric waste being treated will be managed in accordance with the contingency plan Attachment 7, Section G-3.</p>

<p style="text-align: center;">AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p style="text-align: center;">COMPLIANCE METHODOLOGY</p>
	<p>Explosion. An imminent explosion or actual explosion at a MWMU is detected by:</p> <ul style="list-style-type: none"> • Gauges, monitors, or instrumentation that indicates an enclosed vessel or line is accumulating an abnormally large build-up of pressure or temperature; • Visual identification of a bulging or ruptured drum, cylinder, vessel or line; or • An explosion that progresses into fire and smoke, which then activates a fire/smoke alarm within a MWMU. <p>The MWMUs have few potential explosive hazards, and safety equipment and work practices reduce the probability of an explosion. An explosion at a MWMU may originate from a rupture in a compressed gas cylinder, failure of a liquefied petroleum gas tank, or a break in a high-pressure line/vessel.</p> <p>Significant Release of MW. A significant release of MW constituents at a MWMU could result in an exposure to personnel or contamination of the surrounding environment. A significant release could occur from a spill of the MW during storage, characterization, or treatment operations or failure of characterization equipment or control systems. Also, water used to fight fires may become contaminated with MW constituents, imposing additional considerations when disposing of the water. However, the MWMUs are</p>

<p align="center">AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p align="center">COMPLIANCE METHODOLOGY</p>
<p>G-4e Prevention of Recurrence or Spread of Fires, Explosions, or Releases</p> <p>40 CFR 264.56(e) and (f)</p> <p>40 CFR 264.56(e) During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include where applicable, stopping processes and operations, collecting and containing release waste, and removing or isolating containers.</p>	<p>designed and constructed to eliminate, minimize, or control a potential release of MW. Also, safe work practices are implemented to further reduce the potential for a MW release.</p> <p>Released or residual waste (from a fire or explosion) that cannot be identified by labels, records, logbooks, identification numbers, or the Operating Record are sampled and analyzed to determine the chemical properties of the waste. The resulting information is used to determine the proper disposition of the waste.</p> <p>G-4e Prevention of Recurrence or Spread of Fires, Explosions, or Releases</p> <p>The RWMC EAM is responsible for all reasonable measures necessary to ensure fires, explosions, and significant releases do not occur, recur, or spread to other wastes at the MWMUs. These measures may include, where applicable, stopping processes and operations, collecting and containing released waste constituents, and removing or isolating containers.</p> <p>The RWMC EAM is also responsible for ensuring that the MWMUs and equipment contained within are monitored (as practical) for pressure buildup, gas generation, or rupture in valves, pipes, or other equipment.</p> <p>Fires. The MWMUs have many pre-engineered features that reduce the likelihood for a fire to occur, recur, or spread to other wastes contained within the building. All the materials used in the construction of the MWMUs are in accordance with UL, NFPA, and UBC requirements. The MWMUs are equipped with automatic fire protection systems, which consist of a combination of smoke detectors, remote and local alarms, an automatic fire extinguishing system (sprinklers), CO2 Fire Suppression System, located on the arm of the floor mounted manipulator and fire extinguishers. Typically, once a fire is detected in a MWMU, the alarm sounds, the building HVAC system shuts down, and water is introduced through overhead piping. Additionally, when potentially pyrophoric radionuclides are managed in the WMF-676 boxlines, 30 gallons of MgO sand are staged within reach of the box line manipulator arms. The MgO sand fire suppressant is used to control the spread and severity of a reaction, as warranted by the conditions. The CO2 system may be used on combustibles if there is no evidence of continued pyrophoric reaction.</p> <p>Explosions. The WAC for newly generated waste received at the AMWTP prohibits the receipt of explosives. Therefore, only existing wastes stored at the TSA in sealed containers have the potential for hydrogen gas buildup, which could result in an explosion. Unvented, sealed containers with the potential for pressure build-up are vented in the DVS (WMF-634) or DVF (Type I Module). In order to prevent pressure build-up due to radiolytically generated gas, filters are inserted into drums in the DVS or the DVF. See Attachments 1, 1.A, and 1.C for additional information. The following steps are implemented, as necessary, in response to an explosion in a MWMU:</p>

AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION	COMPLIANCE METHODOLOGY
	<ul style="list-style-type: none">• Ensure notification to the INL Fire Department,• Shut down equipment operating in the MWMU,• Evacuate the immediate area of the explosion, and• Implement applicable emergency response procedures, as appropriate. <p>Releases. The MWMUs are designed to meet the HWMA/RCRA secondary containment system requirements, when containers with free liquids are</p>

<p align="center">AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p align="center">COMPLIANCE METHODOLOGY</p>
<p>G-4f Storage and Treatment of Released Materials 40 CFR 264.56(g)</p> <p>40 CFR 264.56(g) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.</p>	<p>present, and are capable of containing spills and leaks. Moveable synthetic spill control barriers may be used between segregated storage areas to provide physical containment for incompatible wastes, if required. Spill pallets/pans may be used to provide secondary containment when free liquids are stored in WMF-636 Pad 2, or other areas that may not have secondary containment. Container storage areas in the MWMUs are visually inspected for evidence of deterioration or releases. See Attachment 4 for further information on inspections. CAMs are used to detect the spread of airborne radioactive contamination where the dense pack container storage configuration is utilized. The CAMs also provide a reasonable indication of a potential significant release of hazardous constituents from the waste, as the radioactive and chemical wastes are commingled.</p> <p>The following actions will be implemented in the event that: (a) a MW spill causes an immediate health hazard; (b) a MW spill cannot be contained with secondary containment or the application of absorbents; or (c) a threat exists for spilled material to migrate out of the MWMUs:</p> <ul style="list-style-type: none"> • Evacuate the immediate area. • Review facility records to determine the identity and chemical nature of the released material, to the extent possible. • Ensure the source of the release is secured, if possible. • Ensure that a dike/spill containment is built to contain run-off, if required. • Ensure storm drains do not receive potentially hazardous run-off or spill material. • Build dikes around storm drains and close any valves controlling discharge, if required. <p>For additional information on the required responses to spills/leaks within a MWMU, see Sections G-4f and G-4i.</p> <p>G-4f Storage and Treatment of Released Materials</p> <p>Once initial spill containment has been completed, the EAM ensures that recovered wastes are properly stored, treated, and/or disposed of, as required by HWMA/RCRA. For spills of liquid that escape secondary containment, the perimeter of the spill is diked with an absorbent material, such as absorbent pillows, that is compatible with the waste(s) released. Freestanding liquid is transferred to a labeled compatible container.</p> <p>The remaining liquid is absorbed with an absorbent material and swept or scooped into a labeled compatible container. Spill residue is removed. Spills of dry waste are swept or shoveled into a labeled compatible container. Waste recovered from the spill is transferred to a new or clean, reusable container.</p> <p>Waste resulting from the cleanup of a fire, explosion, or release of MW is contained and managed as HWMA/RCRA-regulated waste, until such time that it can be determined otherwise.</p> <p>In most cases the MW inventory, as part of the Operating Record, and process knowledge allow a determination of the waste constituents. When necessary, however, samples of the waste may be collected and analyzed to determine applicable HWNs. Typically, EPA-approved sampling and</p>

<p align="center">AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p align="center">COMPLIANCE METHODOLOGY</p>
<p>G-4g Incompatible Waste 40 CFR 264.56(h)(1)</p> <p>40 CFR 264.56(h) The emergency coordinator must ensure that, in the affected area(s) of the facility:</p> <p>(1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and</p>	<p>analytical methods are used.</p> <p>Any contaminated soil resulting from a release of MW outside of secondary containment will be removed and placed into a labeled compatible container. If a spill is contained within secondary containment, then the area will either be decontaminated, the contaminated material (e.g., floor coating) will be removed and replaced, or the contamination will be fixed in place</p> <p>G-4g Incompatible Waste</p> <p>In the event of a significant waste release, the EAM ensures that no wastes are received, treated, or stored in the affected areas until cleanup operations have been completed. This procedure ensures that incompatible wastes are not present in the vicinity of the significant release.</p> <p>Abatement and cleanup waste generated as the result of a spill or release is evaluated to determine its compatibility with other wastes being managed in the storage areas. The evaluation identifies the material or waste that is spilled or released and determines its characteristics (e.g., ignitable, reactive, corrosive, and toxic). The waste generated by the abatement and cleanup activities are stored in that part of the storage area at the MWMUs that have been established to manage wastes with which it is compatible.</p> <p>Additional controls are implemented (as necessary) to ensure segregation/separation of wastes, as required.</p> <p>The RWMC EAM does not allow MW operations to resume in a MWMU if significant amounts of incompatible wastes/materials have been released, before ensuring that necessary post-emergency cleanup operations to remove potentially incompatible wastes/materials are completed. Operations not associated with a leak/spill in a specific MWMU may continue while the leak/spill is mitigated. For example, should a leak/spill occur in the WMF-676 SCW glovebox system, the supercompactor may continue operations.</p>
<p>G-4h Post-Emergency Equipment Maintenance 40 CFR 264.56(h)(2)</p> <p>40 CFR 264.56(h) The emergency coordinator must ensure that, in the affected area(s) of the facility:</p> <p>(2) All emergency equipment listed in the CP is cleaned and fit for its intended use before operations are resumed.</p>	<p>G-4h Post-Emergency Equipment Maintenance</p> <p>The RWMC EAM ensures that emergency equipment is available and ready for its intended use before operations resume. Any equipment that cannot be decontaminated may be discarded. Equipment or supplies that cannot be reused following an emergency are replaced. After the equipment has been cleaned, repaired, or replaced, a post-emergency MWMU and equipment inspection is performed, and the results are recorded.</p> <p>Cleaning and decontamination of equipment may be accomplished using non-hazardous materials whenever possible, by physically removing gross or solid residue, rinsing with water or another non-hazardous liquid, and/or washing with detergent and water.</p> <p>Decontamination and cleaning may be conducted in a confined area that is isolated from the environment. Care is taken to prevent wind dispersion of particles and spray. Liquid or particulate resulting from cleaning and decontamination of equipment is placed in clean, compatible containers.</p>

<p>AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p>COMPLIANCE METHODOLOGY</p>
<p>G-4i Container Spills and Leakage 40 CFR 264.52, 264.171, and 264.175(b)(5)</p> <p>40 CFR 264.52 Content of contingency plan.</p> <ul style="list-style-type: none"> (a) Regulation text is located in Section G-3, Implementation. (b) If the owner or operator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with part 112 of this chapter, or part 1510 of chapter V, or some other emergency or CP, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this part. (c) The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to 264.37. (d) Regulation text is located in Section G-2, Emergency Coordinators. (e) The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list 	<p>After AMWTP personnel have completed any post-emergency cleanup of waste and waste residues from areas where MWMU operations are ready to resume, and the RWMC EAM has ensured that all emergency equipment used in managing the emergency has been cleaned or replaced and is ready for use, notifications are made to the following: EPA Regional Administrator, the Director of the Idaho DEQ, and any relevant local authorities. This post-emergency notification complies with IDAPA 58.01.05.008 [40 CFR 264.56(i)].</p> <p>G-4i Container Spills and Leakage</p> <p>Treatment/storage areas and containers at the MWMUs are inspected per a set schedule, as described in Attachment 4. Corrective or mitigative action is taken when container integrity is significantly deteriorated or compromised.</p> <p>Additionally, AMWTP personnel can repair or overpack a leaking container, or place it in a drip pan before repairing, repackaging, or overpacking, to prevent continued leakage into a storage area that may affect other stored wastes. Damaged or leaking containers are repaired or overpacked before acceptance for storage in a MWMU, or are rejected and repaired, repackaged, or overpacked before being returned to the generator.</p> <p>Waste containers are stored in the MWMUs on pallets, conveyors, or risers (conventional and spill) to prevent released waste from contacting or affecting other containers in storage. Inspections are conducted as described in Attachment 4. Spill response is completed as discussed in Section G-4e, Prevention of Recurrence or Spread of Fires, Explosions, or Releases, except for incidental spills, which would be immediately cleaned up. All spilled or leaked waste is cleaned up in a timely manner.</p>

<p>AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p>COMPLIANCE METHODOLOGY</p>
<p>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.</p> <p>(f) The plan must include an evacuation plan for facility personnel where there is a possibility that an evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).</p> <p>40 CFR 264.51 [The text of 40 CFR 264.51 is located in Section G-1, General Information.]</p> <p>40 CFR 264.171 Condition of containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition or manage the waste in some other way that complies with the requirements of this part.</p> <p>40 CFR 175(b) A containment system must be designed and operated as follows:</p> <p>(5) Spilled or leaked waste and accumulated precipitation must be removed from the sump or collection area in as timely a manner as is necessary to prevent overflow of the collection system.</p>	

<p>AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p>COMPLIANCE METHODOLOGY</p>
<p>G-5 Emergency Equipment 40 CFR 264.52(e)</p> <p>40 CFR 264.52(e) The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), 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.</p>	<p>G-5 Emergency Equipment</p> <p>The types, locations, and capabilities of emergency equipment available in the MWMUs are listed in Table G-2.</p> <p>Communications systems used by the RWMC include commercial telephone, commercial cellular telephones, and radio networks. These communications systems, though not dedicated to emergency response, are available at the RWMC/AMWTP to provide prompt communications.</p> <p>The RWMC/AMWTP evacuation siren and take cover alarm, as well as the emergency voice paging system, are operated from any one of the emergency notification system control panels located in WMF-637, WMF-620, WMF-610, WMF-601, WMF-685 and the Operator Control Stations in WMF-634 and WMF-636. Take cover and evacuation alarms are audible in all areas of the MWMUs.</p> <p>The MWMUs' fire protection systems consist of a combination of smoke detectors, remote and local alarms, automatic sprinkler systems, and/or fire hydrants. Fire alarms are triggered either automatically in response to a fire or manually at a pull box. Once activated, the fire alarm system activates a local alarm and transmits an alarm signal to the INL Fire Department.</p>

Table G-1. Emergency Equipment for the MWMUs

MWMU	Location^a	Equipment
WMF-634	North Wall (3) South Wall (3) West Wall East Wall In the Electrical Room	Fire Extinguishers (ABC Type)
	West Wall East Wall	Spill Control / Cleanup Equipment ^b
	Next to each overhead access door into WMF-634.	Class D Fire Extinguishing Media ^c
Type II Modules (WMF-628 through WMF-633)	North Wall (3) South Wall (3) West Wall East Wall In the Electrical Room	Fire Extinguishers (ABC Type)
	West Wall East Wall	Spill Control / Cleanup Equipment ^b
	Next to each overhead access door into Type II Modules (WMF-628 through WMF-633).	Class D Fire Extinguishing Media ^c
Type I Module ^d	North Wall (2) South Wall (2) West Wall (2) East Wall (4) WMF-615 Area (2) PAAA Interior Walls (2) In the Electrical Room	Fire Extinguishers (ABC Type)
	East Wall South Wall West Wall (2)	Spill Control / Cleanup Equipment ^b
	Next to each overhead access door into WMF-635.	Class D Fire Extinguishing Media ^c
SWEPP	North Wall North Stairwell (2) South Wall East Wall Generator Room H&V Room Electrical Panel Area	Fire Extinguishers (ABC Type)

Table G-1. List of Emergency Equipment (continued)

MWMU	Location ^a	Equipment
SWEPP	South Wall West Wall	Spill Control / Cleanup Equipment ^b
	Next to each overhead access door into the SSA.	Class D Fire Extinguishing Media ^c
WMF-676	Spill Control/Cleanup Equipment 1 st Floor Waste Receiving and Storage, Room 134 (2 locations) 1 st Floor Supercompaction, Room 141B 1 st Floor Drum Staging Area, Room 143 (2 locations) 2 nd Floor SCW Treatment, Room 236 (3 locations)	Spill Control/Cleanup Equipment ^b
WMF-676	Fire Extinguisher Locations 1 st Floor Drum Storage Area 'C', Room 143 (4 locations) 1 st Floor Corridor, Room 145 1 st Floor Drum Storage Area 'A', Room 146 1 st Floor Drum Storage Area 'B', Room 146B 1 st Floor Waste Drum Venturi/Filter, Room 146A 1 st Floor Supercompaction, Room 141B 1 st Floor Drum Venturi Airlock, Room 127A (2 locations) 1 st Floor Transfer Conveyor, Room 131 (3 locations) 1 st Floor LLW Box Fill Station, Room 128A 1 st Floor Secondary Waste Room, Room 128B (2 locations) 1 st Floor Empty Container/LLW Export, Room 128C (2 locations) 1 st Floor Terminal Filter Room, Room 122A (2 locations) 1 st Floor Terminal Filter Room, Room 142B	Fire Extinguisher (ABC Type)

Table G-1. List of Emergency Equipment (continued)

MWMU	Location ^a	Equipment
WMF-676	Fire Extinguisher Locations 1 st Floor Waste Receiving and Storage, Room 134 (3 locations) 2 nd Floor SCW Treatment, Room 236 (6 locations) 2 nd Floor Box Conveyor Area, Room 226 2 nd Floor Area 300 HEPA Filter Room, Room 214A (3 locations) Interstitial Filter Maintenance Area, Room 212C Interstitial Filter Maintenance Area, Room 212F Interstitial Filter Maintenance Area, Room 212H	Fire Extinguisher (ABC Type)
WMF-676	Class D Fire Extinguishing Media Locations 1 st Floor Drum Staging Area, Room 143 (2 locations) 1 st Floor Waste Receiving and Storage Area (2 locations) 1 st Floor Empty Container/LLW Export	Class D Fire Extinguishing Media ^c
WMF-676	CO2 Fire Suppression System and MgO sand fire suppressant Locations 2 nd Floor North Box Line Area, Room 229B (2 locations) 2 nd Floor South Box Line Area, Room 228B	CO2 Fire Suppression System and MgO sand fire suppressant
WMF-636 Pad 2	North Wall (2) South Wall (2) West Wall (2)	Fire Extinguisher (ABC Type)
	North Wall South Wall West Wall	Spill Control / Cleanup Equipment ^b
	Next to each overhead door providing direct access into WMF-636 Pad 2.	Class D Fire Extinguishing Media ^c

- The equipment listed in this Table is located in the vicinity of the areas described in the "Location" column. A single piece of equipment is provided at each location unless otherwise noted in parenthesis following the location description.
- The Spill Control / Cleanup Equipment includes shovel/broom, vermiculite/absorbent, spill pads, acid neutralizer, caustic neutralizer, solvent absorbent, spill disposal plastic bags, scraper/scoop, and pH paper.
- Class D fire extinguishing media is only required when containers identified as pyrophoric radionuclides are stored within a MWMU. The total quantity and location of Class D fire extinguishing media is determined either by the AMWTP Fire Marshall or the INL Fire Department. A minimum of one Class D fire extinguisher will be provided adjacent to each overhead access door into a building that contains pyrophoric radionuclides.
- All wall locations noted for the Type I Module are the exterior walls unless otherwise noted.

<p align="center">AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p align="center">COMPLIANCE METHODOLOGY</p>
<p>G-6 Coordination Agreements 40 CFR 264.52(c) and 264.37</p> <p>40 CFR 264.52(c) The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to 264.37.</p> <p>40 CFR 264.37 Arrangements with local authorities.</p> <p>(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:</p> <p>(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes.</p> <p>(2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;</p> <p>(3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and</p> <p>(4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.</p>	<p>G-6 Coordination Agreements</p> <p>The AMWTP has access to INL resources, such as on-Site security, medical, and fire assistance, on a 24-hr basis. The INL Fire Department would be the primary initial responder to an emergency event originating at the MWMUs. The INL Fire Department is notified of the storage location of all pyrophoric radionuclides stored at the AMWTP.</p> <p>If additional resources are necessary, off-Site assistance is requested through the RWMC and/or INL ERO. Off-Site interfaces for providing emergency response support are coordinated through DOE-ID. DOE-ID has mutual aid agreements in place with federal, state, local, and tribal agencies that define cooperative emergency policies and procedures and the roles of the participants.</p> <p>Appropriate information from the Contingency Plan is provided to the following agencies through the Memorandum of Understandings (MOUs) and Memorandum of Agreements (MOAs) with the DOE-ID.</p> <ul style="list-style-type: none"> • Bingham, Bonneville, Butte, Clark, and Jefferson County Sheriff’s Departments. • Rexburg City/Madison County, City of Ammon, Hamer Volunteer, West Jefferson, City of Arco, City of American Falls, City of Blackfoot, City of Chubbuck, City of Pocatello, City of Rigby, and City of Idaho Falls Fire Departments. • Jefferson Central, Lost River, South Custer Rural, North Custer Rural, and Shelly/Firth Fire Districts. • Fort Hall Fire Protection District. • Portneuf Medical Center, Eastern Idaho Regional Medical Center, Bingham County Memorial Hospital, and Lost River District Hospital. • Bingham County Emergency Management Services, Bonneville County Emergency Management Services, Butte County Emergency Services, Clark County Civil Defense, and Jefferson County Emergency Management. • Shoshone-Bannock Tribes. • Bureau of Land Management, National Park Service, and Department of Agriculture. • State of Idaho and Idaho Transportation Department. • Naval Reactors Facility. <p>The AMWTP has limited capabilities for immediate response for emergencies that occur under controlled conditions (e.g., confined spill/leak that has the potential to affect human health or the environment). The INL Fire Department is the primary responder to all fire and emergency situations at the AMWTP. The INL Fire Department operates separately from the AMWTP, but their activities are coordinated with the EAM. DOE-ID maintains MOUs and MOAs with local and outside agencies that make additional equipment and emergency personnel available if outside assistance is required. In addition, as a DOE facility, the RWMC ERO can call upon additional resources of the INL ERO for assistance. Assistance includes, but is not limited to, local agencies (such as outside medical facilities or state and local law enforcement agencies) and other federal agencies.</p>

<p align="center">AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p align="center">COMPLIANCE METHODOLOGY</p>
<p>(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.</p>	
<p>G-7 Evacuation Plan 40 CFR 264.52(f)</p> <p>40 CFR 264.52(f) The plan must include an evacuation plan for facility personnel where there is a possibility that an evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).</p>	<p>G-7 Evacuation Plan</p> <p>Personnel are notified to take cover and/or evacuate by alarms and voice paging messages. Evacuation routes are through the nearest unobstructed emergency exit. Exhibit G-1 provides the location of evacuation routes for AMWTP personnel at the RWMC.</p> <p>AMWTP personnel are notified of an emergency by the internal communications and alarm system (voice or signal). This system is connected to and compatible with the existing RWMC communications and alarm system. Different audible signals are sounded for fire or building evacuation.</p> <p>The evacuation routes for the MWMUs are through the nearest personnel exit or egress doors. Exhibit G-2 shows evacuation routes and the locations of the personnel egress doors at WMF-634. Exhibit G-3 shows evacuation routes and the locations of the personnel egress doors in the Type II Modules (WMF-628 through WMF-633). Exhibit G-4 shows evacuation routes and the locations of the personnel egress doors in the Type I Module. Exhibit G-5 shows evacuation routes and the locations of the personnel egress doors at SWEPP. Exhibits G-6, G-7, and G-8 show evacuation routes and the locations of the personnel egress doors at WMF-676. Exhibit G-8 shows evacuation routes and the locations of the personnel egress doors for WMF-636 Pad 2. Exhibit G-9 shows evacuation routes for the AMTWP Outside Storage Area.</p> <p>The MWMU layouts provide adequate emergency evacuation routes through aisles around stored waste. Upon evacuating the MWMUs, personnel exit the RWMC through either the south or north gate designated for the AMWTP, unless directed otherwise. Personnel evacuate to a designated assembly area, normally the south gate evacuation assembly area. During an evacuation of the RWMC or the AMWTP, AMWTP personnel typically use buses, government vehicles, or privately owned vehicles to evacuate the site.</p>

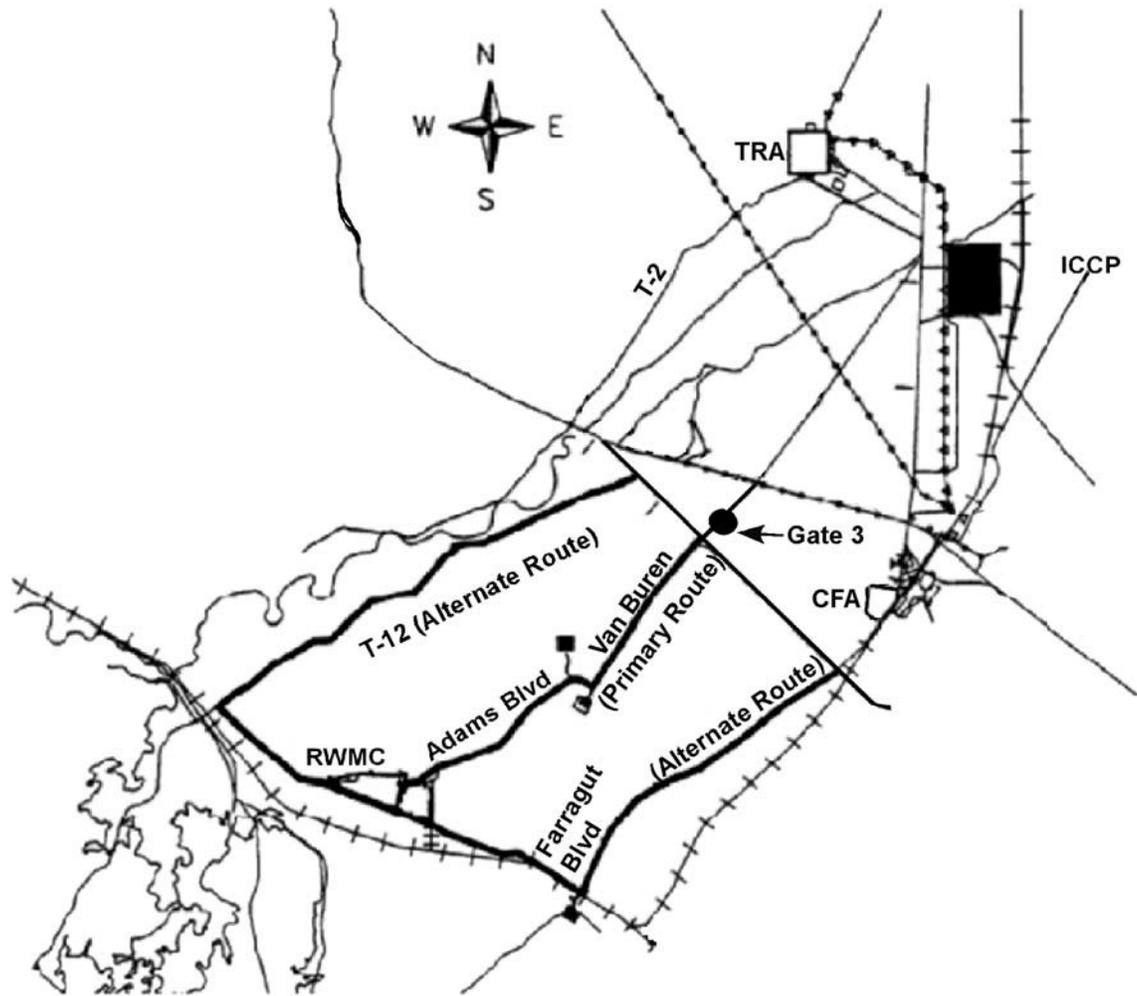


Exhibit G-1. AMWTP Evacuation Routes

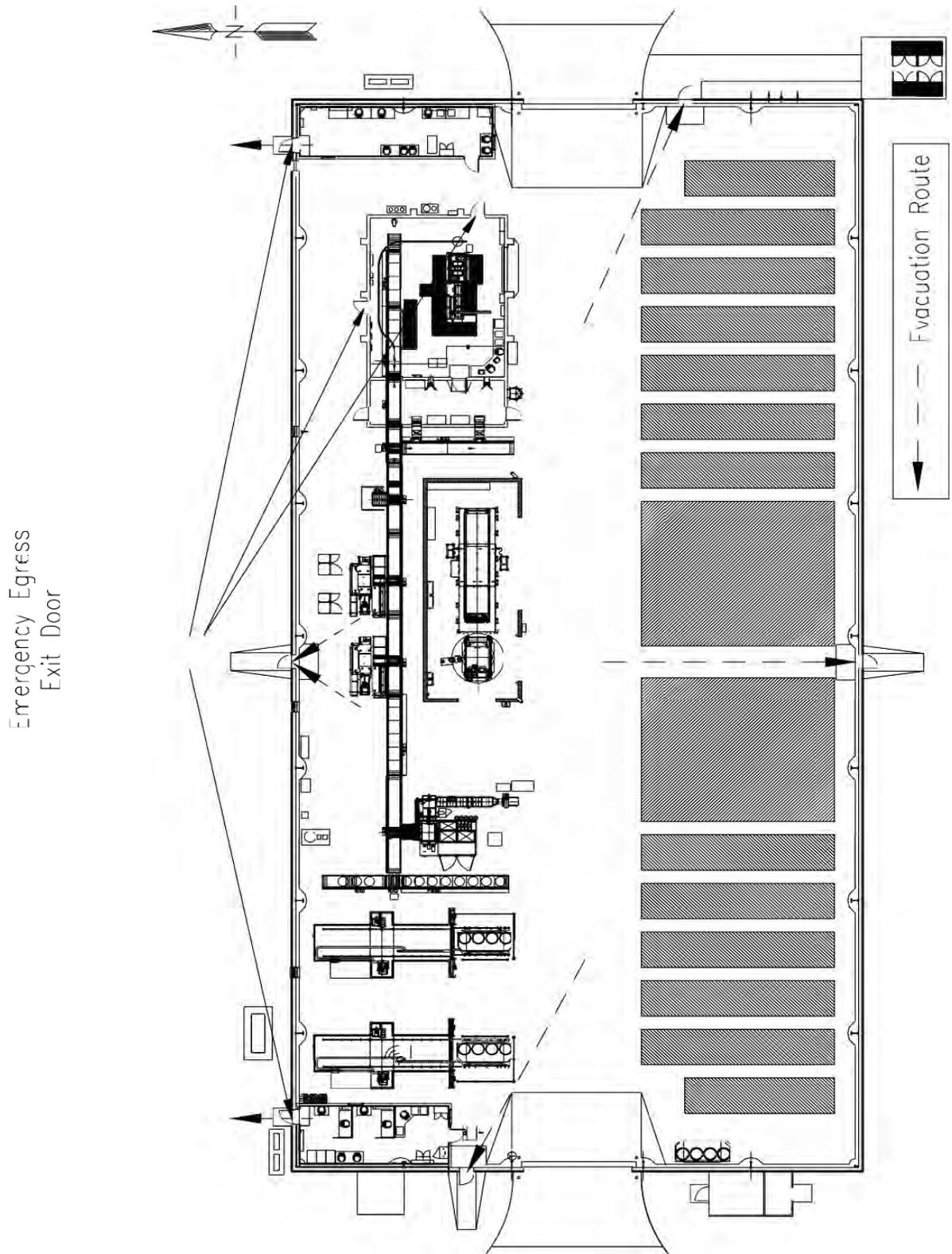


Exhibit G-2. WMF-634 Evacuation Routes

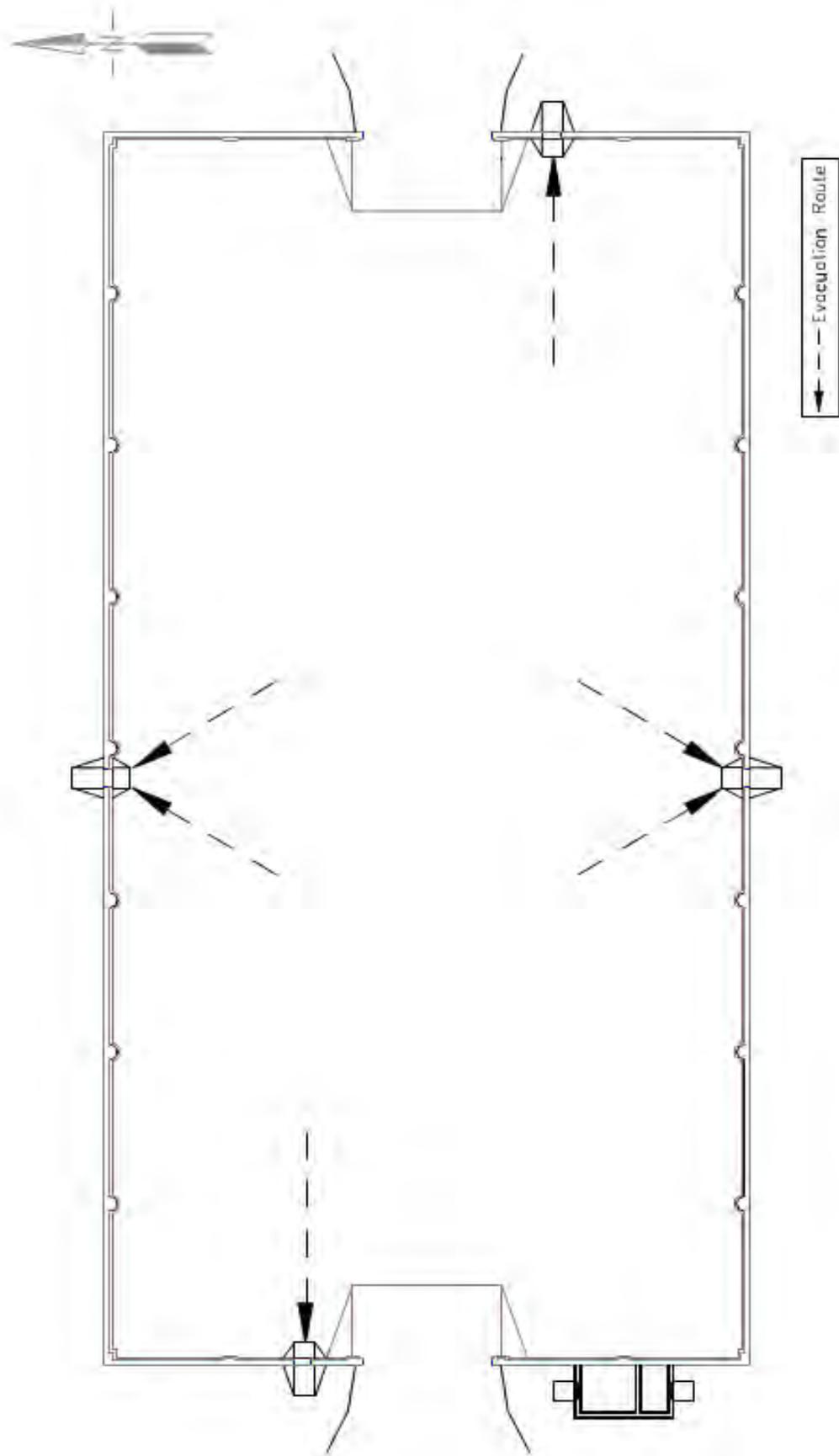


Exhibit G-3. Type II Module Evacuation Routes

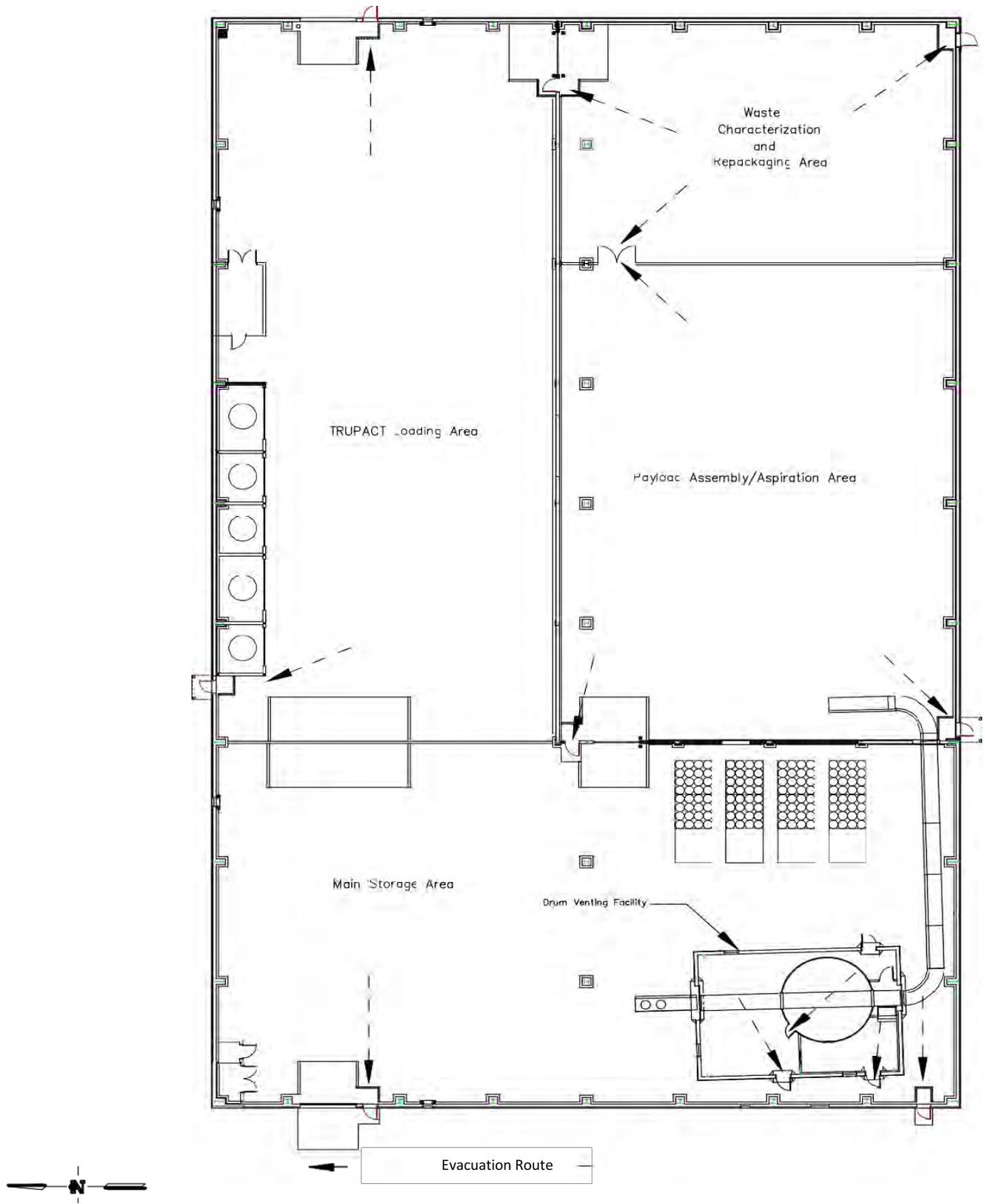


Exhibit G-4. Type I Module Evacuation Routes

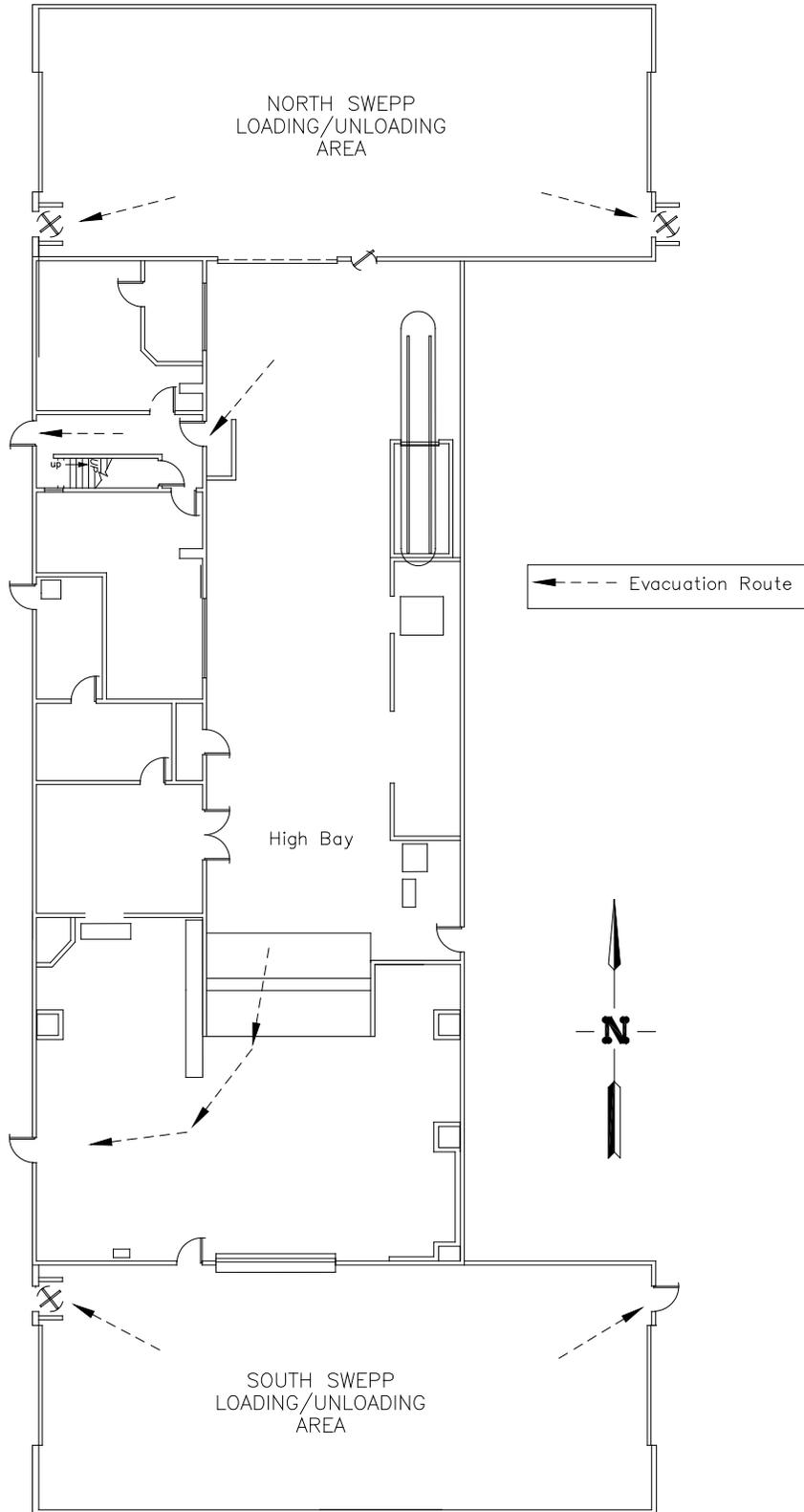


Exhibit G-5. SWEPP Evacuation Routes

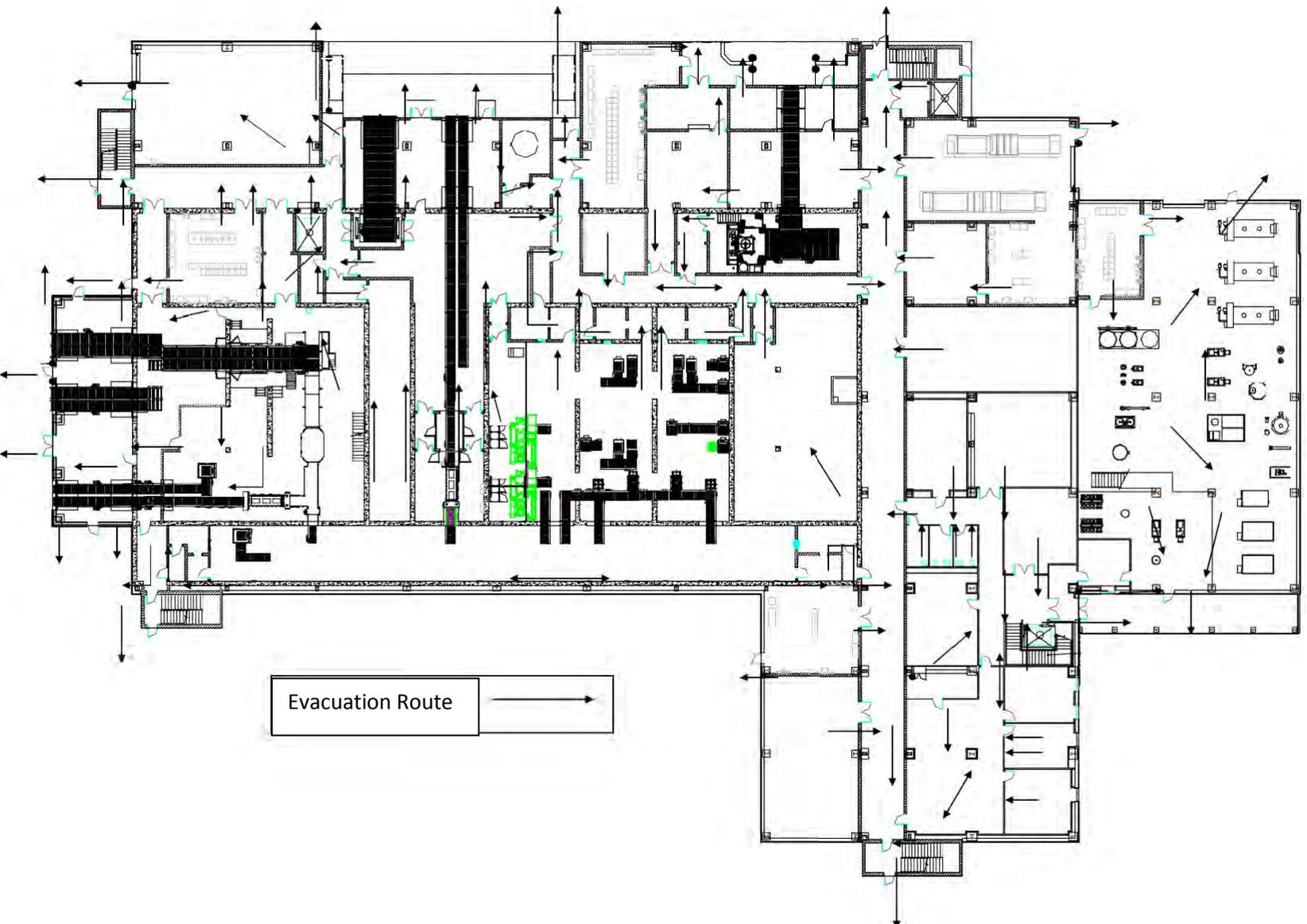


Exhibit G-6. WMF-676 First Floor Evacuation Routes

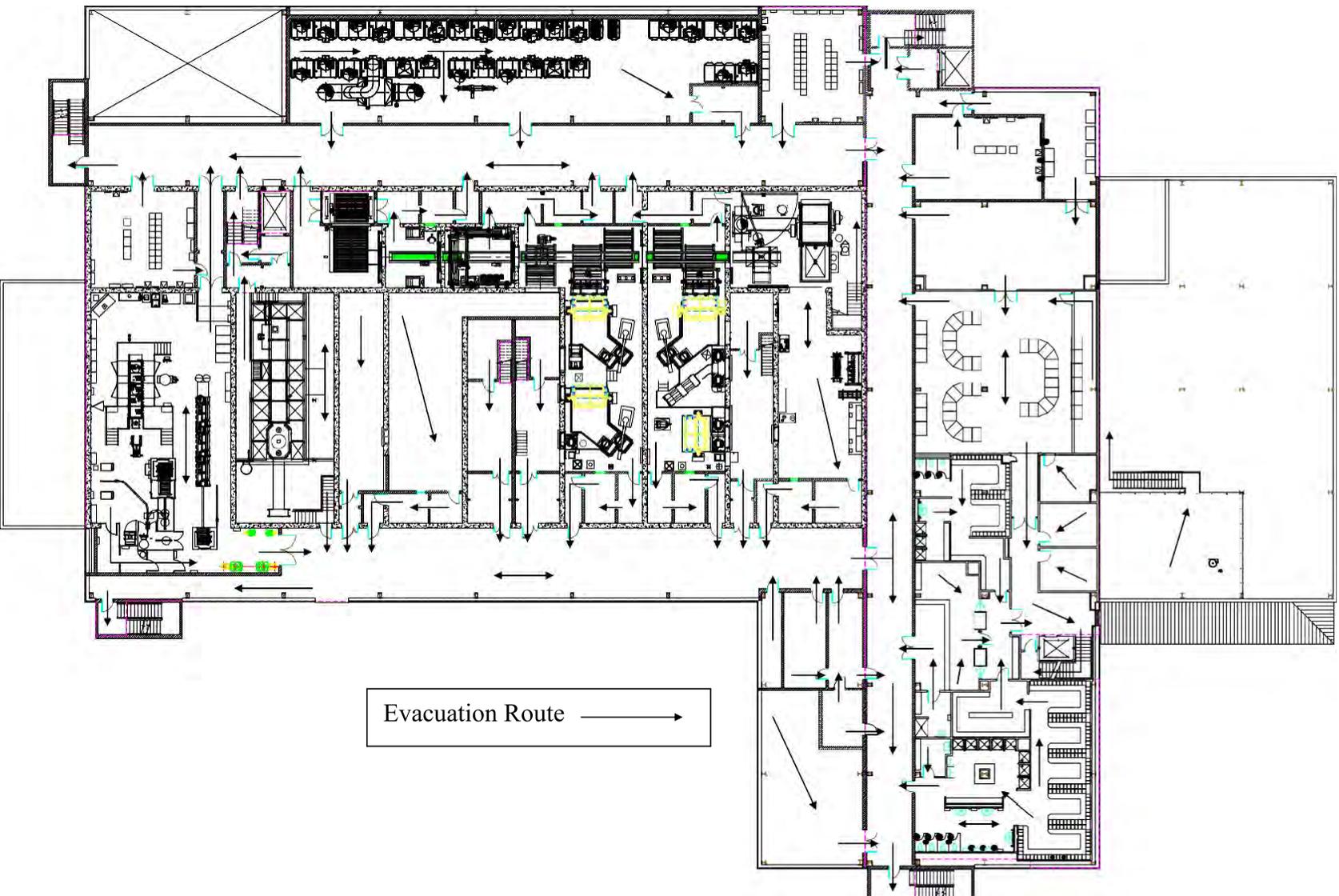


Exhibit G-7. WMF-676 Second Floor Evacuation Routes

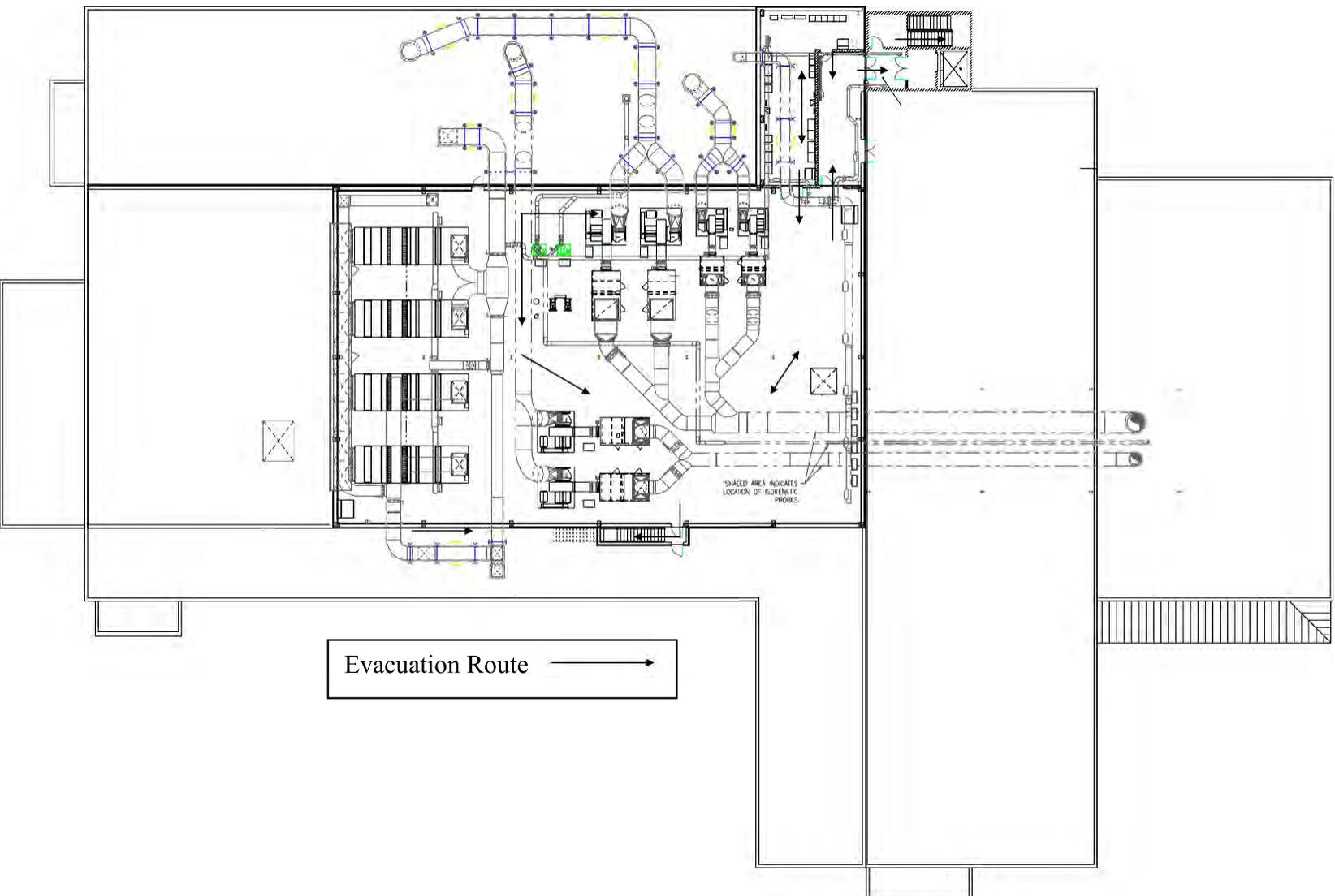


Exhibit G-8. WMF-676 Penthouse/Roof Evacuation Routes

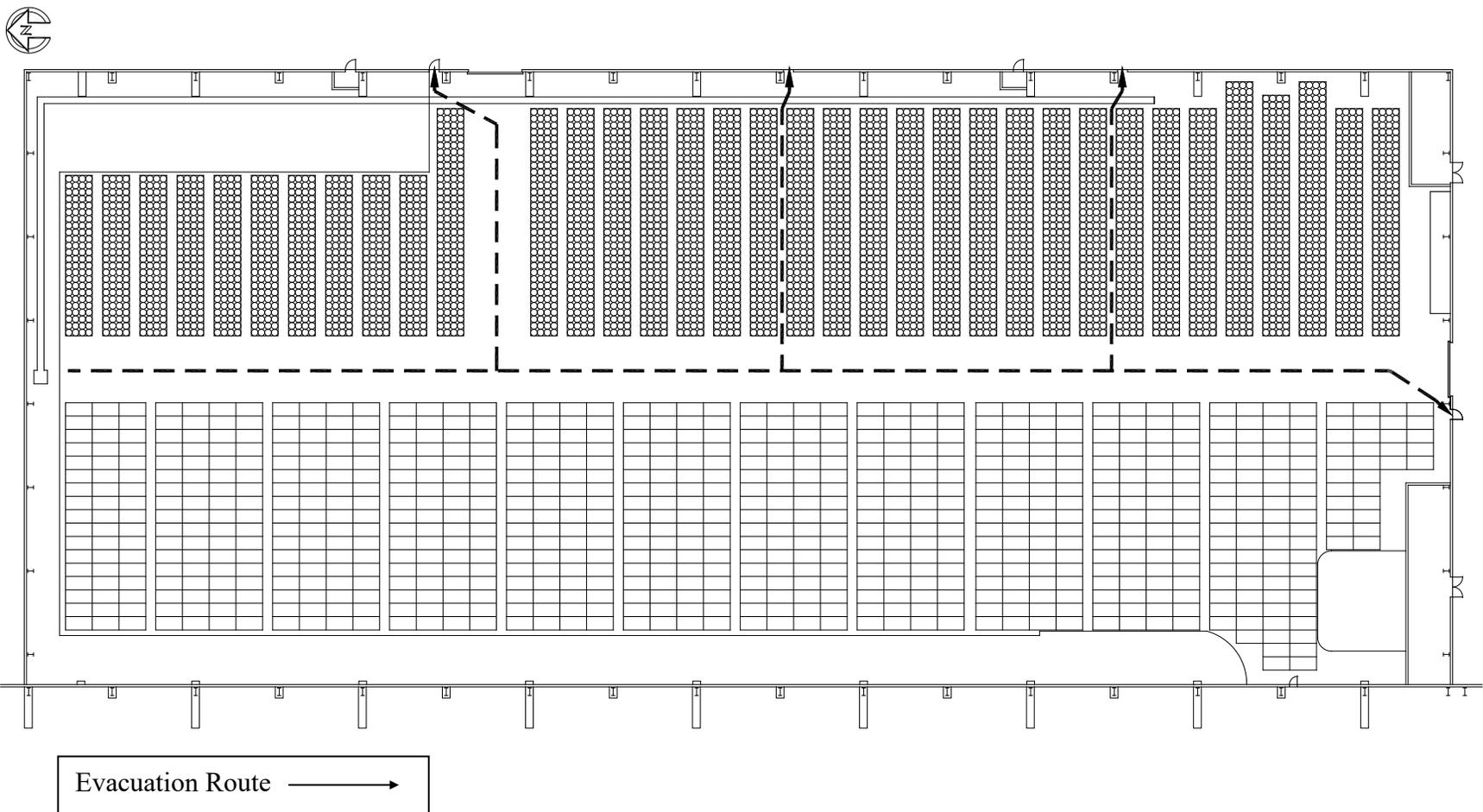


Exhibit G-9. WMF-636 Pad 2 Evacuation Routes

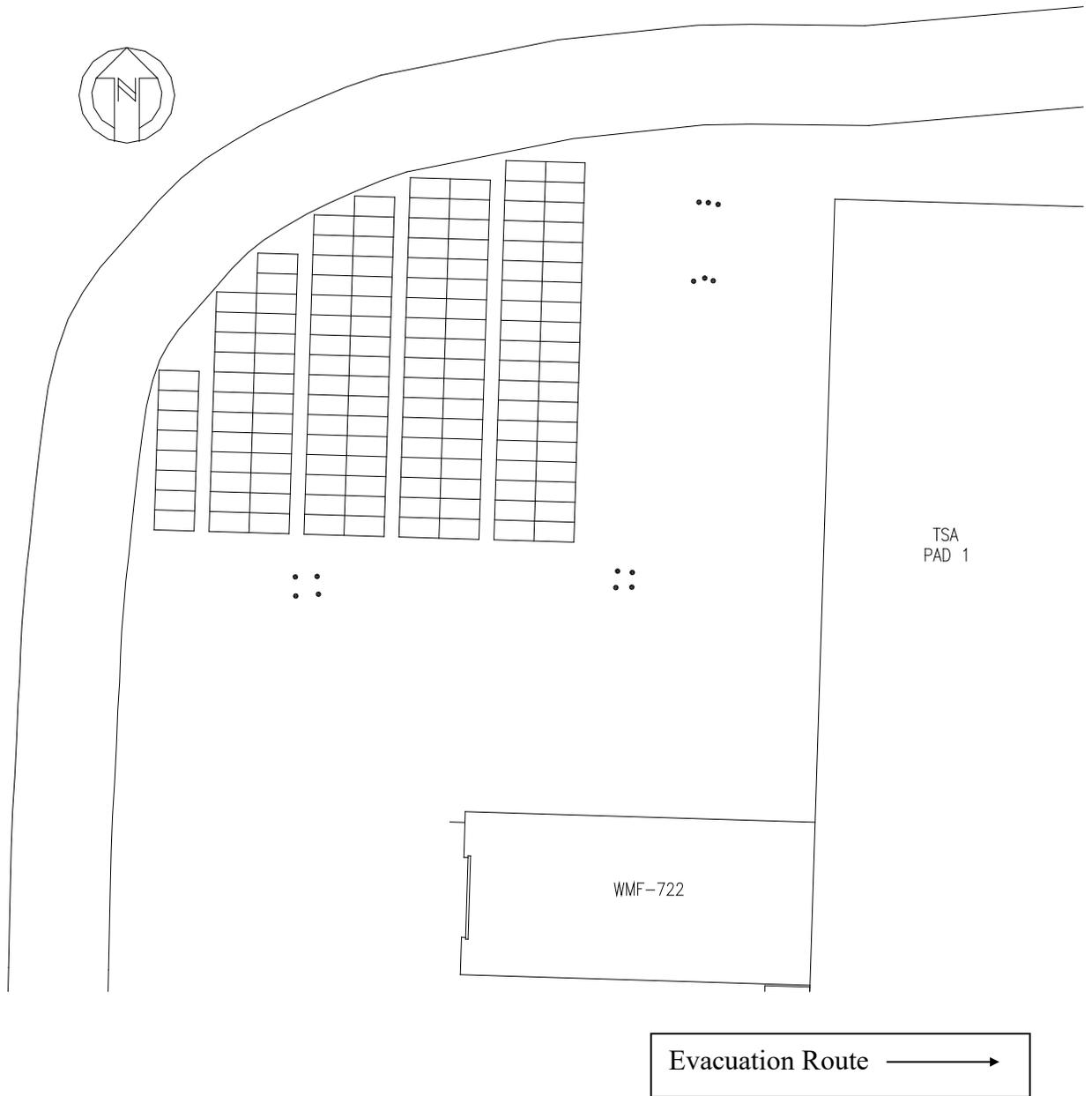


Exhibit G-10. AMWTP Outside Storage Area Evacuation Routes

<p style="text-align: center;">AT KEARNEY FORMAT SECTION REGULATORY REFERENCE/CITATION</p>	<p style="text-align: center;">COMPLIANCE METHODOLOGY</p>
<p>G-8 Required Reports 40 CFR 264.56(j) and 40 CFR 264.56(i)</p> <p>40 CFR 264.56(j) The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the CP. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator. The report must include:</p> <ol style="list-style-type: none"> (1) Name, address, and telephone number of the owner or operator; (2) Name, address, and telephone number of the facility; (3) Date, time, and type of incident (e.g., fire, explosion); (4) Name and quantity of material(s) involved; (5) The extent of injuries, if any; (6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and (7) Estimated quantity and disposition of recovered material that resulted from the incident. <p>40 CFR 264.56(i) The owner or operator must notify the Regional Administrator, and appropriate State and local authorities, that the facility is in compliance with paragraph (h) of this section before operations are resumed in the affected area(s) of the facility.</p>	<p>G-8 Required Reports</p> <p>Emergency logs and records are considered part of the Operating Record and are maintained per IDAPA 58.01.05.008 (40 CFR 264.73). Information is used to provide the details necessary to submit a written report on the incident, if necessary, to the Director of the Idaho DEQ and the EPA Regional Administrator within 15 days of the event.</p> <p>Such reports include, at a minimum, the following:</p> <ul style="list-style-type: none"> • Name, address, and telephone number of the MWMU owner or operator; • Name, address, and telephone number of the MWMU; • Date, time, and type of incident (e.g., fire, explosion); • Name and quantity of material(s) involved; • Extent of any injuries, if any; • Assessment of any actual or potential hazards to human health or the environment; and • Estimated quantity and disposition of material recovered from the incident.