

Revised 08/04

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STATE OF COLORADO

Bill Owens, Governor  
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department  
of Public Health  
and Environment

DIST.	LTR	ENC
BERARDINI, J.H.	X	X
BOGNAR, E.S.	X	X
BROOKS, L.	X	X
BUTLER, L.	X	X
CARPENTER, M.	X	X
CROCKETT, G. A.		
DECK, C. A.	X	X
DEGENHART, K. R.		
DIETER, T. J.		
FERRERA, D. W.	X	X
GIACOMINI, J. J.		
LINDSAY, D. C.	X	X
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	X
NAGEL, R. E.	X	X
NESTA, S.		
NORTH, K.	X	X
RODGERS, A. D.		
SHELTON, D. C.	X	X
SPEARS, M. S.	X	X
PIZZUTO, V.M.		
TUOR, N. R.	X	X
WIEMELT, K.	X	X
WILLIAMS, J. L.		
ZAHM, C.	X	X
Baseman	X	X

September 7, 2004

Mr. Joseph Legare, Director  
Project Management Division  
U.S. Department of Energy  
Rocky Flats Field Office  
10808 Highway 93, Unit A  
Golden, Colorado 80403-8200

Ms. Karan North, Division Manager,  
Environmental Systems & Stewardship  
Kaiser-Hill Company, L.L.C.  
Rocky Flats Environmental Technology Site  
10808 Highway 93, Unit B, Trailer T-130C  
Golden, CO 80403-8200

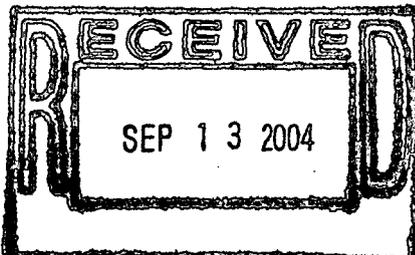
RE: Approval of Permit Modification Request #04-01 and Transmittal of Revised Pages

Dear Ms. North and Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), has reviewed, and hereby approves, Permit Modification Request #04-01 received from DOE and Kaiser-Hill on August 18, 2004. This Class 1 permit modification request submitted under Permit Condition II.O and requiring prior written approval from the Division, incorporates changes to the Contingency Plan, Part VIII, of the Rocky Flats Environmental Technology Site (RFETS) RCRA Permit No. CO-04-06-23-01 (the "Permit").

Specifically, the revision clarifies that the following portions of the EPLAN are enforceable as part of the Contingency Plan:

- those portions that address hazardous waste or hazardous waste constituents,
- those provisions of the EPLAN and/or any other emergency response plan that would be implemented whenever there is a fire, explosion, or release involving hazardous waste or hazardous waste constituents which could threaten human health or the environment (per 6 CCR 1007-3, Section 264.51), and



ADMIN RECORD

SW-A-004999

COR. CONTROL	X	X
ADMIN. RECORD	X	X
PATS/130		

Reviewed for Addressee  
Corres. Control RFP

9/14/04 *LC*  
Date By

Ref. Ltr. #

DOE ORDER #

5400.1

22

September 7, 2004

- further incorporates a description of the arrangements made by the Permittee with emergency responders, a list of emergency coordinators and their phone numbers, and a list of all necessary emergency communications and alarm equipment.

In accordance with Section 100.511(b) of the Colorado Hazardous Waste Regulations, this approved permit modification shall become effective immediately. Procedures for appeal of this decision are contained in Section 100.514.

Most pages of Section VIII were modified. Consequently, we are showing the entire section as Revision 1, dated September 7, 2004, and are providing a copy for internal distribution. Additionally, please discard pages ii and I-i, one sheet, and replace with sequential pages ii, iii (new), and I-i, two sheets, as provided.

If you have any questions concerning the modification, please contact Harlen Ainscough at (303) 692-3337.

Sincerely,



Steven H. Gunderson  
RFCA Project Coordinator

Enclosures

cc: A. Rosenman, Kaiser-Hill  
D. Shelton, Kaiser-Hill  
D. Miller, AGO  
Mark Aguilar, EPA

Joyce Williams, CDPHE  
N. Newell, CDPHE  
Jefferson County Health Department  
Administrative Records Building T130G

FACILITY: ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE (RFETS)

ADDRESS: 10808 Highway 93  
Golden, Colorado 80403-8200

EPA ID. #: CO7890010526

Permit No.: CO-04-06-18-01

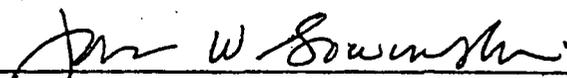
Pursuant to the Colorado Hazardous Waste Act (Title 25 Article 15, Section 101 et seq.) hereafter called "the Act", and regulations promulgated thereunder by the Colorado Hazardous Waste Commission (Codified and to be codified in Title 6 of the Code of Colorado Regulations (CCR)), a State RCRA Permit is issued to the United States Department of Energy and to Kaiser-Hill Company, L.L.C. (jointly, "the Permittee"), to operate a hazardous and mixed waste facility located in Jefferson County, Colorado, centered at Latitude 39° 53' 30" North and Longitude 105° 11' 30" West. The Permittee must comply with all terms and conditions of this permit.

This Permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 6 CCR 1007-3, Parts 260 through 268, 2, 99, and 100 as specified in the Permit. Applicable regulations are those which are in effect on the date of issuance of this Permit. This Permit is based on the assumption that the information submitted to the Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (CDPHE) in the Permittee's Part A and Part B permit application attached to the Permittee's letter dated December 20, 2001, as modified by a subsequent amendment dated October 22, 2003 (hereafter referred to as the application), and additional information submitted to clarify previously submitted material, is accurate.

Any inaccuracies found in this information may be grounds for the termination or modification of this Permit (see 6 CCR 1007-3, Section 100.6) and potential enforcement action. The Permittee must inform the Hazardous Materials and Waste Management Division of CDPHE of any deviation or changes in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of July 23, 2004, (30 days after issuance) and shall remain in effect until July 23, 2009 (5 year duration) unless revoked and reissued, or terminated under 6 CCR 1007-3, Section 100.61.

Signed:



Joan Sowinski, Program Manager  
Federal Facilities Program  
Hazardous Materials and Waste Management Division

23 June 04  
Date

**PART I-STANDARD CONDITIONS**

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## **PART VIII - CONTINGENCY PLAN**

### **VIII.A. PURPOSE**

Incident response actions at the Rocky Flats Environmental Technology Site (Site) are governed by two documents. For non-emergency incidents, the Occurrence Reporting Process Procedure (ORPP) is used, while the Site Emergency Plan (EPLAN) is used for response actions to incidents categorized as emergencies.

Non-emergency incident response is conducted in accordance with the ORPP, which is maintained by the Occurrence Notification and Reporting Organization at the Site. It provides Site personnel with a method for categorizing and reporting non-emergency incidents that occur within their area. Since response actions to incidents categorized as non-emergency may differ depending on the affected building or area, the ORPP does not provide specific response actions. Specific response actions are conducted in accordance with building or area procedures.

Emergency response actions at the Site are governed by the EPLAN. The EPLAN is maintained by the Emergency Preparedness Organization at the Site. The EPLAN provides an overview of the Site Emergency Response Organization and the roles and responsibilities of its members to develop, prepare, implement and maintain the capability to respond to and mitigate the effects of hazards associated with emergencies; to direct protective actions for workers and Site visitors; to notify off-site officials and provide protective action recommendations for the public; to limit adverse impacts to the environment; and to use the "as low as reasonably achievable" principle for hazard exposure limits for workers responding to the emergency. This Contingency Plan supplements the EPLAN for incidents which directly involve hazardous waste or hazardous waste constituents which could endanger human health or the environment. Portions of the EPLAN that address hazardous waste or hazardous waste constituents, as well as those provisions of the EPLAN and/or any other emergency response plan that would be implemented whenever there is a fire, explosion, or release involving hazardous waste or hazardous waste constituents which could threaten human health, or the environment (per 6 CCR 1007-3, Section 264.51), are hereby incorporated as part of this Contingency Plan, and are enforceable as part of the Contingency Plan. Any provisions of this Part VIII specifying that action be taken in accordance with the EPLAN are enforceable requirements of this Contingency Plan.

Even though the ORPP is referenced in this section of the Permit, it is not intended that it become part of the Permit. Any changes in the EPLAN that may impact the implementation of the Contingency Plan will be reported to the Division in writing. If the Department determines that such changes do affect the Contingency Plan, the Department must approve them prior to incorporation into the EPLAN.

### **VIII.B. INCIDENT CATEGORIZATION AND INITIAL RESPONSE**

All incidents at the Site are categorized based on their extent, impact on normal or safe operations, threat posed to human health and the environment, and the actions and personnel necessary for mitigation and remediation. When discovered, an incident is reported to building/area management. If building/area management is not available, the incident may be reported to emergency personnel through the Site emergency phone number (X2911) or directly to the On Call Project Manager. The On Call Project Manager is the manager for the facility or project designated by facility/project management to act as the Emergency Coordinator. Each project will maintain a list of the On Call Project Manager and designated alternates with contact name(s) and phone number(s). If the On Call Project Manger or designated alternate is

unavailable, Attachment E lists the Emergency Coordinators. Following the completion of required initial notifications; building/area management will assess the incident, categorize it, and provide direction for its mitigation (if possible through the utilization of area equipment and personnel). If the incident is categorized as an "emergency," initial response actions are conducted to isolate the area and ensure area personnel are made aware of the situation and do not unknowingly enter the affected area.

**VIII.B.1. Response to Non-Emergency Incidents**

If the incident is categorized as a non-emergency, response actions are conducted at the building level in accordance with approved Site procedures. The following examples are considered non-emergency incidents that would not require implementation of the Site Contingency Plan.

- VIII.B.1.a. A release of a hazardous or mixed waste within secondary containment, a building, structure or area, that meets the following criteria: is less than a reportable quantity (RQ) pursuant to 40 CFR 302.6; and is determined not to threaten human health or the environment. If the release is not cleaned up within 24 hours, then report to the Colorado Department of Public Health & Environment (CDPHE) as indicated in Attachment B.
- VIII.B.1.b. A fire or explosion of a controllable nature in a regulated waste management area that activates a fire suppression system (e.g., halon discharge, sprinkler heads); will not cause the release of vapors to the environment in excess of a RQ above authorized release levels; has been determined not to be a threat to human health or the environment; and is extinguished utilizing available equipment following the arrival of fire protection personnel.
- VIII.B.1.c. An incident in a hazardous or mixed waste management area causing personal injury requiring only minor first-aid treatment.
- VIII.B.1.d. A release or spill of hazardous waste from a tank system located inside a building or secondary containment, that is less than a RQ. If the release is not cleaned up within 24 hours, then report to CDPHE as indicated in Attachment C.

Non-emergency incidents require timely response of personnel assigned to the affected area (incidental response) for mitigation, clean-up, or attention. Emergency units and personnel external to the area in which the incident occurs are not typically involved in response to this type of incident, although fire protection personnel will respond to the area if fire detection equipment is activated as a result of the incident. Acceptable personal protective equipment (PPE) for responding to a non-emergency incident is normal work area clothing and equipment; this may include higher levels of PPE and spill response equipment maintained at or near the affected waste management unit. Area personnel respond to these incidents in accordance with area-specific procedures and direction from area supervision.

When notified of the incident and the initial categorization, the On Call Project Manager monitors response activities to ensure additional resources are made available should the need arise. Should it be deemed necessary, the On Call Project Manager may re-categorize the incident as an "emergency" at any time to initiate more vigorous response actions. If this were to occur, all required notifications and documentation would be

carried out in accordance with the EPLAN.

**VIII.B.2. Response to Emergency Incidents**

Hazardous waste emergencies requiring implementation of the Contingency Plan (including incorporated elements of the EPLAN or other emergency response plan per Section VIII.A above) include, but are not limited to, the following types of incidents:

- VIII.B.2.a. A hazardous waste incident resulting in a fire or explosion that threatens human health or the environment.
- VIII.B.2.b. A hazardous waste incident resulting in injuries to personnel who then require hospitalization.
- VIII.B.2.c. A release of an RQ of hazardous waste, where the release is directly to the environment, or where there is a possible pathway and probable release to the environment.
- VIII.B.2.d. For releases that do not meet or exceed the RQ, a determination will be made based on available information regarding potential threat to human health or environment. The Emergency Coordinator will make the determination. The results of the determination will be documented as required in the EPLAN and such documentation shall be maintained in the operating record.

For incidents categorized as an emergency that involve hazardous waste, the EPLAN and the Contingency Plan will be implemented.

**VIII.C. CONTINGENCY PLAN IMPLEMENTATION**

Implementation of the Contingency Plan results from the categorization of a hazardous waste incident as an emergency (see VIII.B.2 above); non-emergency hazardous waste incidents do not necessarily necessitate implementation of the Contingency Plan (see VIII.B.1 above). Emergency incidents are managed in accordance with the Contingency Plan.

**VIII.D. EMERGENCY COORDINATORS**

At the Site, the On Call Project Manager for the Project or Area or designee acts as the Emergency Coordinator (EC). The EC must have knowledge of the project. These individuals have extensive knowledge of the project or area and receive training to act as a first responder for hazardous/mixed waste incidents, and applicable training in accordance with the Training Plan. In the event of an emergency incident, the EC is responsible for the implementation and coordination of the Contingency Plan. The EC is responsible for the initiation of site-wide response to emergencies. If an emergency encompasses more than one area or project, the EC is the first On Call Project Manager contacted.

In the event of an Operational Emergency as defined in the EPLAN, including implementation of the Contingency Plan, the EC is required to assume the role of Incident Commander (IC). In these capacities, the EC has full authority to enlist all available Site resources and those discussed in Section H of this Part to mitigate any emergency situation.

Per Site procedures, the EC is notified of all incidents at the Site. The EC relies upon incident descriptions (non-emergency or emergency), professional judgment, and input from personnel in the affected area to determine whether the conditions of VIII.B.2 exist requiring implementation of the Contingency Plan.

Only the EC may implement the emergency procedures of the Contingency Plan. All other actions outlined in the Contingency Plan may be performed by others (e.g., Crisis Manager, Senior Fire Protection Officer, Senior Security Officer) as delineated in the EPLAN. If the EC is not immediately available, the Contingency Plan requirements will be implemented by the Senior Site Fire Department Officer. However, it remains the responsibility of the EC to ensure that the emergency procedures outlined in the Contingency Plan are completed.

In the event of an emergency, the EC will determine whether to activate the Emergency Operations Center (EOC). The EOC is staffed by teams of individuals from various disciplines at the Site who are assembled in time of emergency to evaluate an incident from their varied perspectives and ensure that response to an emergency incident is properly evaluated, coordinated, and implemented. In the event of an emergency, the EPLAN will be used to manage the activities of those charged with guiding the response measures. Periodic drills at the Site are conducted to ensure prompt and appropriate response actions are conducted. The regulatory requirements of the Contingency Plan for notification of local and national authorities are incorporated in response activities conducted as part of the EPLAN. In addition, flowcharts summarizing off-site notification for a potential hazardous waste release are provided as Attachment B and Attachment C.

In the event of an emergency, the EC can be contacted by calling the appropriate On Call Project Manager directly or by dialing extension 2911 from on-site or (303) 966-2911 from off-site (the Site emergency telephone number). The 2911 operator then will contact the appropriate On Call Manager for the project or area. Additionally, Site personnel are trained to alert emergency personnel by lifting the receiver of a fire phone and leaving it off the hook. This automatically alerts the fire department of an incident and its location. In this manner, personnel unable to call the On Call Project Manager directly can notify emergency personnel of an incident requiring response without remaining in the area of the incident.

#### **VIII.E. EMERGENCY PROCEDURES**

In the event of an emergency incident, the personnel and entities listed below have the following responsibilities:

##### **VIII.E.1. Emergency Coordinator (EC)**

The EC will ensure that the following actions are completed in accordance with existing Site policies, procedures, and plans (e.g., EPLAN and Contingency Plan):

##### **VIII.E.1.a. Internal Communications**

Activate internal Site alarms or communication systems, where applicable, to notify affected Site personnel of the emergency. A listing of communications systems is provided as Attachment D;

##### **VIII.E.1.b. Notification of Agencies**

Notify appropriate State and local agencies of the emergency (a list of Federal, State, and local agencies to be contacted is provided as Attachment A);

**VIII.E.1.c. Spill Characteristics**

Identify the character, source, amount, and extent of any released materials by utilizing observation, process knowledge, records review or chemical analysis;

**VIII.E.1.d. Hazards Assessment**

Assess possible hazards to human health or the environment that may result from the incident including indirect effects of the release, fire, or explosion;

**VIII.E.1.e. Impact Assessment**

Determine whether the incident could threaten human health or the environment outside the Site;

**VIII.E.1.f. Evacuation Protocols**

Immediately notify appropriate local authorities if evacuation of local areas is advisable;

**VIII.E.1.g. Notification to the National Response Center**

Immediately notify the National Response Center (NRC) at 1-800-424-8802 if the release of hazardous waste is equal to or exceeds a Reportable Quantity (RQ), or threatens human health or the environment outside the Site and report the following:

VIII.E.1.g.i. Name and telephone number of reporter;

VIII.E.1.g.ii. Name and address of Site;  
• Include City, County and State  
• Nearest street corner or landmark;

VIII.E.1.g.iii. Time and type of incident;

VIII.E.1.g.iv. Name and quantity of material(s) involved, to the extent known;

VIII.E.1.g.v. The extent of injuries, if any; and

VIII.E.1.g.vi. The possible hazards to human health or the environment outside the Site.

VIII.E.1.g.vii. How did the release occur, define causes if known.

**VIII.E.1.h. Containment and Control**

Take reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the Site. These

measures include stopping processes and operations, collecting and containing released waste, and removing or isolating any containers threatened by the incident or impeding response activities.

VIII.E.1.i. Protocols for Restart

If hazardous waste operations at the Site are stopped in response to a fire, explosion, or release, then monitor for leaks, pressure buildup, gas generation, or rupture in valves, pipes, or other equipment as appropriate. Prior to the restart of any operations that are stopped, the Permittee will provide notification to the Division representative.

VIII.E.1.j. Waste Handling

Provide for the treatment, storage, or disposal of recovered waste, contaminated soil or surface water or any other material that resulted from the incident within 14 calendar days from the date of the incident. (The Permittee may submit either a verbal or written request to extend this fourteen (14) calendar-day limit, on a case-by-case basis. The request must include an explanation of the unforeseen or uncontrollable circumstances that have resulted in the need for additional time to complete the remedial action(s) and must be received by the Division prior to the time limit expiration.) The EC will utilize the support of a waste characterization SME, as appropriate.

VIII.E.1.k. Cleanup

Once the incident has been controlled, cleanup and/or removal will begin. Cleanup of releases to containment involves collecting and containing any released material including liquids and contaminated sorbent material. After cleanup, the responsible supervisor shall verify that visible residual liquids and solid wastes have been removed from equipment and structures (such as berms) to a "dry condition" to ensure no further threat of release to the environment. The EC must determine if the support of an industrial hygienist and/or radiological protection technician is required to confirm that any potential exposure hazard (as a result of the release) is appropriately addressed in a manner that is protective of human health and the environment. In addition, for releases involving mixed hazardous waste, the EC will ensure that the radiological decontamination requirements are followed.

Hazardous waste releases (including a material which, when discharged, becomes a hazardous waste) into inadequate containment will be assessed by evaluating the condition of the containment and the actual or potential threat to human health or the environment. An engineer(s) with experience in materials and construction methods and familiar with the Colorado Hazardous Waste Regulations shall perform a visual inspection of the containment to verify that the area affected by the release is free of cracks, gaps, structural inadequacies, or other pathways to soil, surface water, or ground water.

VIII.E.1.l. Restoration of Site and Emergency Equipment

Ensure that, in the affected area(s) of the Site:

- VIII.E.1.1.i. No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed;
- VIII.E.1.1.ii. Emergency equipment is cleaned and fit for its intended use before hazardous waste operations are resumed; and
- VIII.E.1.1.iii. Following the receipt of the notification from the responsible manager identified in Section VIII.E.2.b of this Part, provide notification to the Division representative that post-emergency equipment maintenance has been completed.

**VIII.E.2. Responsible Manager**

The manager of the affected area shall implement the following actions:

- VIII.E.2.a. Note in the operating record the time, date, and details of the incident.
- VIII.E.2.b. Prior to resuming operations in the affected area(s), notify the EC that area(s) of the Site affected by the incident are in compliance with Section VIII.E.1.k of this part and that operations discontinued as a result of the incident are to be restarted.
- VIII.E.2.c. Provide assistance to the EC as necessary.

**VIII.E.3. Permittee**

- VIII.E.3.a. Within 15 days, submit a written report on the incident to the Division. The report must include:
  - VIII.E.3.a.i. name, address, and telephone number of the owner, operator, or co-operator;
  - VIII.E.3.a.ii. name, address, and telephone number of the Site;
  - VIII.E.3.a.iii. date, time, and type of incident (e.g., release, fire, explosion);
  - VIII.E.3.a.iv. name and quantity of material(s) involved;
  - VIII.E.3.a.v. the extent of injuries, if any;
  - VIII.E.3.a.vi. an assessment of actual or potential hazards to human health or the environment, where applicable; and,
  - VIII.E.3.a.vii. estimated quantity and disposition of recovered material that resulted from the incident.

**VIII.F. EVACUATION PLANS**

Evacuations of buildings or areas at the Site shall be conducted in accordance with applicable building or area procedures or instructions provided by building or area management. Site

personnel shall be provided with facility-specific training regarding evacuation notification, primary and alternate evacuation routes, facility hazards, and assembly areas. Maps detailing both primary and alternate evacuation routes to designated assembly areas shall be posted at entrances to each building or area. Floor-mounted egress arrows may be used in place of maps where appropriate. Drills shall be conducted periodically to ensure Site personnel are familiar with the evacuation routes.

In the unlikely event emergency conditions warrant the evacuation from the entire Site, the evacuation will be carried out in accordance with documented Site Evacuation procedures maintained by the Emergency Preparedness organization.

Site personnel will be notified via the Life Safety/Disaster Warning (LS/DW) system, two-way radios, and/or the internal telephone system and provided with information regarding best routes and methods of transportation for conducting the evacuation.

**VIII.G. COORDINATED EMERGENCY SERVICES**

The Site has signed Memoranda of Agreements/Memoranda of Understandings (MOAs/MOUs) or Mutual Aid Agreements (MAAs) with the organizations identified in Table VIII-1. Original copies of each agreement are maintained by the Permittee.

**TABLE VIII-1**

<b>Agreement</b>	<b>Role</b>	<b>Type</b>
Arvada Fire Protection District	Fire Response, HAZMAT Response	MAA
Boulder County Sheriff's Department	Law Enforcement Support, Traffic Control	MOA
Cherryvale Fire Protection District	Fire Response	MAA
City of Westminster	Fire Response, Technical Rescue	MAA
Coal Creek Canyon Fire Protection District	Fire Response	MAA
City of Golden	Fire Response	MAA
Colorado State Patrol	Law Enforcement Support, Traffic Control	MOU
DOE Idaho Operations Office	Radiological Assistance Program (RAP) Support	MOU
Fairmount Fire Protection	Fire Response	MAA
Federal Bureau of Investigation	Hostage Rescue or regional Special Weapons and Tactics Team upon request	MOU
FEMA, Region VIII	Provides appropriate regional response team support upon request	MOU
Jefferson County Sheriff's Department	Law Enforcement Support, Traffic Control	MOU
North Metro Fire Rescue Authority	Fire Response	MAA
St. Anthony Hospitals, Inc	Provides emergency support for contaminated injured	MOU

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	personnel	
University of Colorado Hospital Authority	Provides emergency support for contaminated injured personnel	MOU

The Permittee must ensure that these MOUs and MAAs remain in effect for the life of the Permit. If any of these emergency service providers decide not to continue the MOU or MAA, the Division must be notified within seven (7) days. The Mutual Aid Agreements and Medical MOUs contain provisions for the availability of ambulance and Flight-for-Life support including provisions for the immediate transport of radioactively contaminated individuals. Copies of these formal agreements must be available and maintained in the operating record. Activities related to joint emergency response planning are facilitated through the Joint Planning Team, conducted under the direction of the Colorado Department of Public Health and Environment, Emergency Management Program.

#### **VIII.H. EMERGENCY EQUIPMENT**

The emergency equipment available at the Site shall, at a minimum, meet the requirements of 6 CCR 1007-3, Section 264.32 and 265.32. The Fire Department's Baseline Capabilities document and Program Execution Guide outline the minimum equipment and staffing required to protect the Site and surrounding public. A description of the emergency equipment follows:

##### **VIII.H.1. Fire Control Equipment**

The Site operates a fully staffed fire department for on-site emergency response. The majority of the Site's fire fighting equipment is located at the on-site Fire Department. A listing of fire control equipment, including location and capability, is maintained by the Fire Protection Engineering and Fire and Emergency Services organizations and is updated regularly by Industrial Hygiene personnel and/or the Fire Department personnel. This information is available for review.

##### **VIII.H.2. Spill Response Equipment**

The Fire Department maintains spill control equipment. Details on the Fire Department's hazardous materials response program are contained in Site Fire Department standard operating procedures. A listing of the Fire Department's spill control equipment is maintained by the Fire and Emergency Services organization and is available for review.

In addition, areas where hazardous waste is generated, accumulated, stored, or treated have adequate spill control equipment and/or supplies available to respond to a non-emergency release. Each hazardous waste area will be analyzed at least annually by appropriate personnel to verify adequacy of spill control equipment and/or supplies available. A list of the spill response materials accessible to each unit is maintained at or near the waste management unit.

**VIII.H.3. Decontamination Equipment**

Decontamination facilities are located in various buildings at the Site. The decontamination facilities are maintained with monitoring equipment, showers, and decontamination materials. Eyewash stations and safety showers are located throughout the Site. In addition, the Fire Department maintains decontamination pools.

**VIII.H.4. Medical Equipment**

A medical facility is present at the Site to provide medical services to Site personnel. The Site maintains a staff of medical professionals to provide medical services on a 24-hour basis. Doctors and/or nurses are available during normal business hours with EMTs providing the remainder of the coverage. The medical facility has primary treatment stations for initial emergency care. Personnel who have sustained more serious injuries will be transported to designated local area hospitals that are prepared to accept both contaminated and uncontaminated personnel.

Site personnel shall be provided with Site- and facility-specific training to identify the locations of emergency equipment, for proper response to incidents and alarms, and incident reporting requirements. This training must be conducted when personnel are assigned to a new or different area of the Site and annually thereafter during the assignment.

**VIII.I. DOCUMENTS TO BE MAINTAINED ON-SITE AS PART OF THIS PERMIT**

**VIII.I.1. Evacuation Routes**

A copy of the evacuation routes shall be maintained at each building and will be presented to the Director's inspectors upon request.

**VIII.I.2. Satellite and 90-Day Accumulation Areas**

An up-to-date list of satellite and 90-day accumulation areas will be maintained at the facility, and will be presented to the Director's inspectors upon request.

**VIII.I.3. Fire Hydrants and SCBA's**

An up-to-date list of fire hydrants and self-contained breathing apparatus (SCBA's) at the facility shall be maintained at the Fire Department, and will be presented to the Director's inspectors upon request.

**VIII.I.4. Fire Extinguishers**

A list of fire extinguishers (including location) shall be maintained by the Fire Department. Individual building lists of fire extinguishers are also maintained in a majority of the buildings.

**VIII.I.5. Emergency Contacts**

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Phone numbers for emergency contacts in Attachment A will be kept up-to-date, and updates to phone numbers will be made as a Class 1 Permit Modification when necessary.

VIII.I.6. Spill Control Inventory

An up-to-date inventory of release response (spill control) equipment and/or supplies for responding to incidental releases, maintained at the hazardous waste storage or treatment facilities, will be presented to the Director's inspectors upon request.

**ATTACHMENT A**

**Emergency Response Contacts**

Federal (Only for a release, fire, or explosion that could threaten human health or the environment or a release in excess of the Reportable Quantity (RQ))

EPA/National Response Center  
Washington, D.C.  
(800) 424-8802 (24 hours)

State (For a release, fire, or explosion that could threaten human health or the environment or a release in excess of the Reportable Quantity (RQ) or whenever the Contingency Plan has been implemented)

Colorado Department of Public Health and Environment  
24-Hour Environmental Emergency Spill Reporting Hotline  
4300 Cherry Creek Drive South  
Denver, CO 80246-1530  
(877) 518-5608 (24 hours)

The State offices below may be contacted in addition to the reporting hotline at the discretion of the EC.

Hazardous Materials and Waste Management Division  
(303) 692-3300 (business hours)

Water Quality Control Division  
(303) 692-3500 (business hours)

Air Pollution Control Division  
(303) 692-3100 (business hours)

Local (For a release, fire, or explosion that could threaten human health or the environment outside the facility or a release in excess of the Reportable Quantity (RQ) or whenever the Contingency Plan has been implemented)

Jefferson Co. Emergency Planning Commission (LEPC)  
100 Jefferson County Parkway  
Golden, CO 80412  
(303) 271-8215

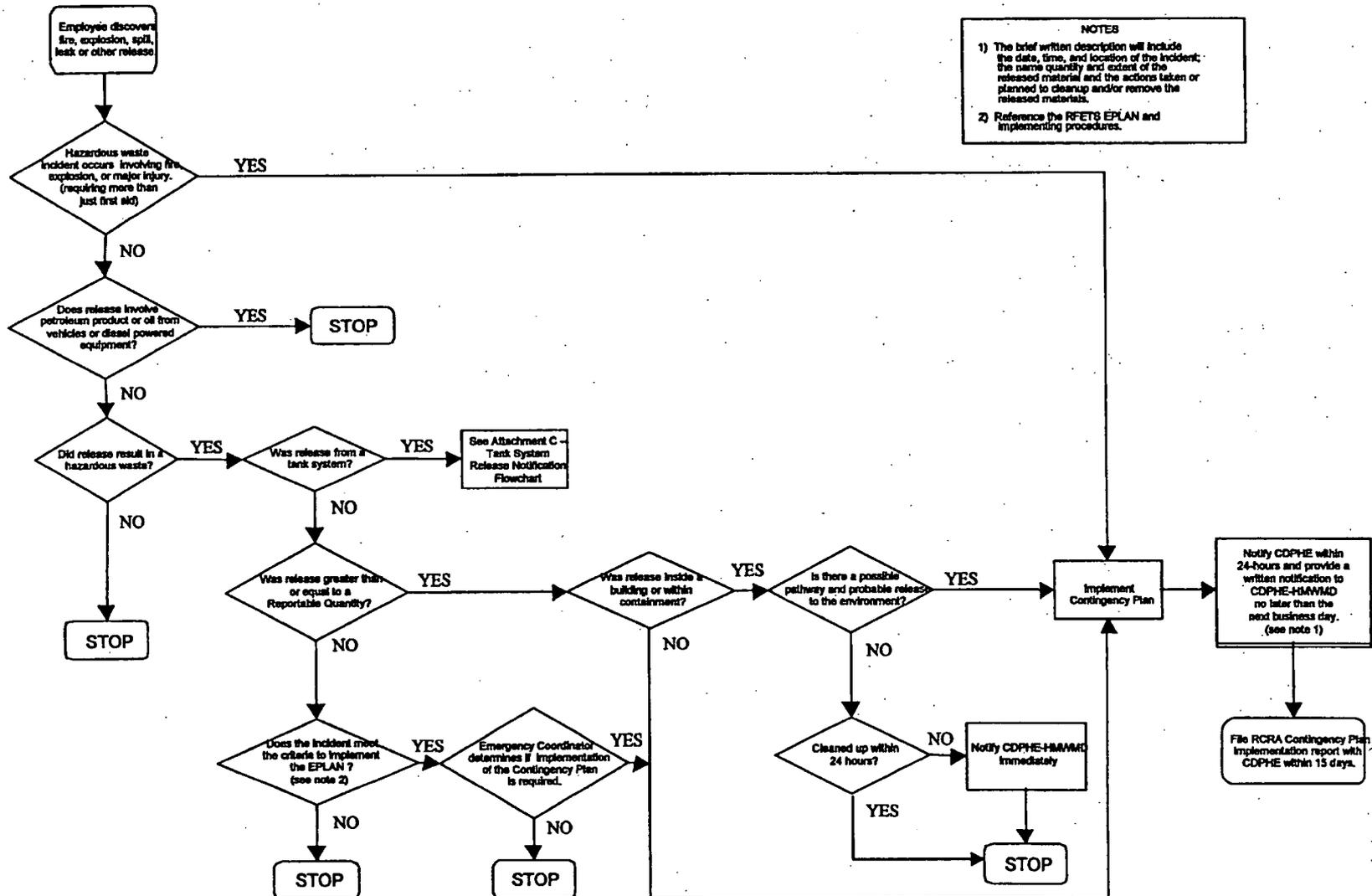
In addition to the above, the following will be contacted automatically through the Metropolitan Emergency Telephone System used by the facility:

Adams County  
Arvada Fire  
Arvada Police Department  
Boulder County  
Broomfield Police Department  
Colorado State Patrol  
West Metro Fire  
Westminster Police Department

In addition to the above, the following may be contacted:

Northglenn Water Department (303) 451-1289  
Thornton Water Department (303) 255-7723  
Westminster Water Department (303) 430-2400

**ATTACHMENT B – HAZARDOUS WASTE RELEASE NOTIFICATION FLOWCHART**



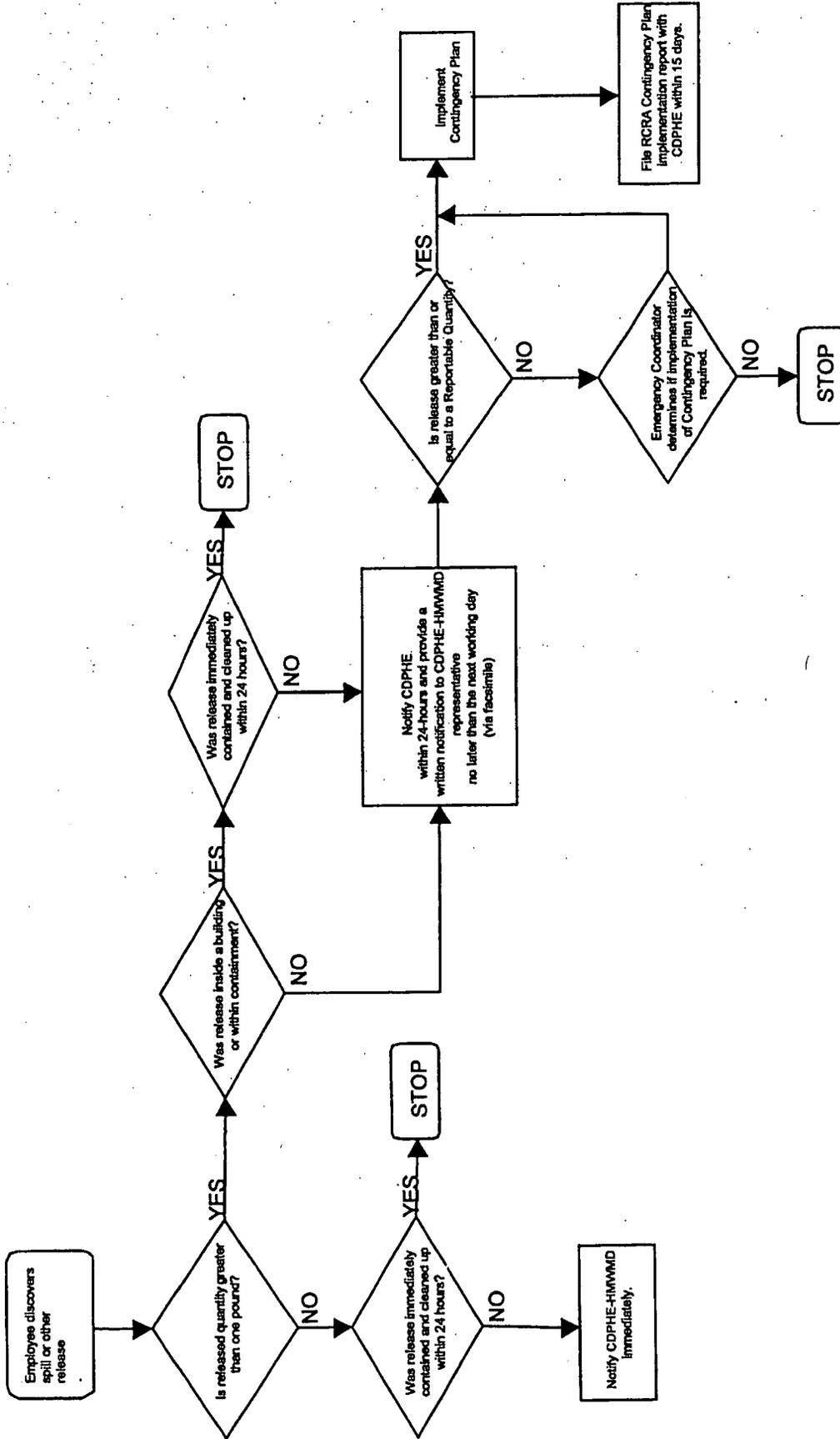
**NOTES**

- 1) The brief written description will include the date, time, and location of the incident; the name, quantity and extent of the released material and the actions taken or planned to cleanup and/or remove the released materials.
- 2) Reference the RFETS EPLAN and implementing procedures.

Notify CDPHE within 24-hours and provide a written notification to CDPHE-HMAMD no later than the next business day. (see note 1)

File RCRA Contingency Plan implementation report with CDPHE within 15 days.

**ATTACHMENT C - TANK SYSTEM RELEASE NOTIFICATION FLOWCHART**



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**ATTACHMENT D - EMERGENCY COMMUNICATIONS AND ALARM EQUIPMENT**

**Internal Communications**

In facilities so equipped, personnel will use the telephone system or the fire phones to report emergencies. In locations without phones, personnel will use two-radios (or equivalent) for communications and emergency notification.

The fire alarm system and the Life Safety Disaster Warning (LS/DW) public address system are available in some locations to notify facility personnel of an emergency situation and provide immediate instructions.

For areas that utilize the LS/DW System to notify facility personnel of operational activities, including emergency instructions and information pertaining to personal safety requirements, the LS/DW must be fully operational and audible. If the LS/DW system is not functional, an alternate means of communication must be used to notify personnel of emergency situations and to maintain contact. Alternate communication methods to be employed will include either the use of radios (or equivalent such as cellular phones) or buddy systems with an individual outside of the affected area. If an alternate system is not instituted, the areas must be evacuated and access restricted until a functioning system is established.

Finally, some buildings are equipped with an automatic fire suppression/detection and alarm system that will immediately and concurrently alert personnel at the Fire Department and the Site protection central alarm station when a fire is detected. In lieu of automatic concurrent alarms, alternative and equivalent measures will be used to notify the Fire Department.

**External Communications**

Off-site communications with Federal and State agencies, hospital facilities and other agencies are maintained by telephone, two-way radio systems, and the Metropolitan Emergency Telephone System (METS). The METS is a Denver Metro Area emergency notification and information system with various subscribers that include law enforcement, government agencies, emergency organizations and news media.

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**ATTACHMENT E - EMERGENCY COORDINATOR LIST**

<u>Name</u>	<u>24 Hour Phone</u>
Mark Heser	303.994.8192
Randy Leitner	303.944.5347
Bob Nininger	303.994.9123
John Wrapp	303.994.1598