



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

CERTIFIED MAIL

SEP 14 2009

Mr. Ryan Jarvis
Heart of America Northwest
1314 N.E. 56th Street Suite 100
Seattle, Washington 98105

Dear Mr. Jarvis:

FREEDOM OF INFORMATION ACT REQUEST (FOI 2009-0054)

This letter is a partial response to your letters dated June 22, 2009, and July 15, 2009.

In response to item 8, you requested "any records and documents relating to the contingency plan required pursuant to Washington Administrative Code Sections 173-303-806, 340, 350, 355 or 360, federal hazardous waste law (RCRA), or the federal Superfund law (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986, or any other legal requirement, for the mixed waste disposal trenches 31 and 34 located in the 200 West area of Hanford, and for the Low-Level Burial Grounds located in the 200 East and 200 West Areas of Hanford; including, but not limited to a) the contingency plan proposed when the facility was planned; b) the contingency plan effective when it was built and became operational; c) any contingency plan approved by the Washington Department of Ecology, and/or US EPA which is in effect today; d) any proposed contingency plans submitted to Ecology for revision of the Site-wide RCRA permit or for permitting of the Mixed Waste Trenches or the Low-Level Burial Grounds; and e) all correspondence from Washington Ecology or US EPA relating to deficiencies in any such application, seeking clarification of application elements, approving or rejecting any such applications.

In response to item 8, a copy of DOE letter 08-AMCP-0063 was provided to you in response to item 2. In response to item 8a, documents responsive to this item were provided to you on August 5, 2009, and September 9, 2009, in response to items 1 and 1a. The Contingency Plan has also been deemed responsive to this item and is enclosed with deletions pursuant to Exemption 2 of the FOIA. Exemption 2 protects information on matters that are "related solely to the internal personnel rules and practices of an agency." This Exemption has been interpreted to encompass two categories of information that may be protected from disclosure. One of the categories is information of "more substantial internal matters, the disclosure of which would risk circumvention of a legal requirement." Information within this category would principally be of use to persons seeking to violate the law and avoid detection. Information of this nature is referred to as "High 2" information.

Mr. Ryan Jarvis

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The High 2 information that has been deleted from the document could provide potentially sensitive insight into the operations of the LLBG. If this information was released, it could be used to educate terrorists (and other individuals or entities seeking to harm the national security) about the sensitive operations of the LLBG. For this reason, the information has been deleted.

In response to items 8b, please see our response to item 8a above. For 8c, we have conducted a thorough search and no documents were located. Since the LLBG is under interim status, there is no approved contingency plan that requires approval until the LLBG permit becomes final. For items 8d and 8e, please see our response to item 8 above.

This is our final response to your requests. All releasable information in the documents has been segregated and is being provided to you. The undersigned individual is responsible for this determination. You have the right to appeal to the Office of Hearings and Appeals, as provided in 10 CFR 1004.8, for any information denied to you in this letter. Any such appeal shall be made in writing to the following address: Director, Office of Hearings and Appeals (HG-1), U.S. Department of Energy, L'Enfant Plaza Building, 1000 Independence Avenue SW, Washington, D.C. 20585-1615, and shall be filed within 30 days after receipt of this letter. Should you choose to appeal, please provide this office with a copy of your letter.

If you have any questions regarding your request, please contact me at our address above or on (509) 376-6288.

Sincerely,



Dorothy Riehle
Freedom of Information Act Officer
Office of Communications
and External Affairs

OCE:DCR

Enclosure

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7.0 CONTINGENCY PLAN [G]

The requirements for a contingency plan at the Low-Level Burial Grounds (LLBG) are satisfied in the following documents: Portions of the Hanford Facility RCRA Permit (Permit) Attachment 4 *Hanford Emergency Management Plan* (DOE/RL-94-02) and this Chapter.

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

Table 7-1 identifies the sections of the unit-specific building emergency plan written to meet WAC 173-303-350(3) contingency plan requirements identified in this application. In addition, Section 12.0 of the unit-specific LLBG building emergency plan is written to meet WAC 173-303 requirements identifying where copies of Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) and the building emergency plan are located and maintained on the Hanford Facility. Therefore, revisions to Chapter 7.0 require a permit modification subject to WAC 173-303-830 and/or Permit Condition I.C.3.

Table 7-1. Hanford Facility Documents Containing Contingency Plan Requirements of WAC 173 303-350(3).

Requirement	Permit Attachment 4 Hanford Emergency Management Plan (DOE/RL-94-02):	Building Emergency Plan ¹ (HNF-IP-0263-BG)	Chapter 7.0
-350(3)(a) - A description of the actions which facility personnel must take to comply with this section and WAC 173-303-360.	[REDACTED]	[REDACTED]	[REDACTED]
-350(3)(b) - A description of the actions which shall be taken in the event that a dangerous waste shipment, which is damaged or otherwise presents a hazard to the public health and the environment, arrives at the facility, and is not acceptable to the owner or operator, but cannot be transported pursuant to the requirements of WAC 173-303-370(5), Manifest system, reasons for not accepting dangerous waste shipments.	[REDACTED]	[REDACTED]	[REDACTED]
-350(3)(c) - A description of the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services as required in WAC 173-303-340(4).	[REDACTED]	[REDACTED]	[REDACTED]

Table 7-1. Hanford Facility Documents Containing Contingency Plan Requirements of WAC 173 303-350(3).

Requirement	Permit Attachment 4 Hanford Emergency Management Plan (DOE/RL-94-02):	Building Emergency Plan ¹ (HNF-IP-0263-BG)	Chapter 7.0
-350(3)(d) - A current list of names, addresses, and phone numbers (office and home) of all persons qualified to act as the emergency coordinator required under WAC 173-303-360(1). Where more than one person is listed, one must be named as primary emergency coordinator, and others must be listed in the order in which they will assume responsibility as alternates. For new facilities only, this list may be provided to the department at the time of facility certification (as required by WAC 173-303-810 (14)(a)(I)), rather than as part of the permit application.	[REDACTED]	[REDACTED]	[REDACTED]
-350(3)(e) - A list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.	[REDACTED]	[REDACTED]	[REDACTED]
-350(3)(f) - An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe the signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.	[REDACTED]	[REDACTED]	[REDACTED]

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

1 ⁶ The Hanford Facility (sitewide) signals are provided in this document. No unit/building signal information is
2 required unless unique devices are used at the unit/building.

3 ⁷ An evacuation route for the TSD unit must be provided. Evacuation routes for occupied buildings surrounding the
4 TSD unit are provided through information boards posted within buildings.

5

6 7.1 BUILDING EVACUATION ROUTING (BUILDING LAYOUT)

7 Figures 7-1 and 7-2 provide identification of the primary and secondary staging areas and a general layout
8 of the LLBG. Alternate evacuation routes will be used on a case-by-case basis based on meteorological
9 conditions at the time of the event.

10 7.2 BUILDING EMERGENCY DIRECTOR

11 Emergency response will be directed by the Building Emergency Director (BED) until the Incident
12 Commander (IC) arrives. The incident command system (ICS) and staff, with supporting on-call
13 personnel, fulfill the responsibilities of the Emergency Coordinator as discussed in WAC 173-303-360.
14 During events, LLBG personnel perform response duties under the direction of the BED. The Incident
15 Command Post (ICP) is managed by either the senior Hanford Fire Department member present or senior
16 Hanford Patrol member present on the scene (security events only). These individuals are designated as
17 the IC and as such, have the authority to request and obtain any resources necessary for protecting people
18 and the environment.

19 The BED becomes a member of the ICP and functions under the direction of the IC. In this role, the BED
20 continues to manage and direct LLBG operations.

21 A listing of the BEDs by title, work location and work telephone number is contained in Section 7.7 of
22 this plan. The BED is on the premises or is available through an "on-call" list 24-hours-a-day.
23 Names and home telephone numbers of the BEDs are available from the Patrol Operations Center (POC)
24 in accordance with Permit Condition II.A.4.

25 7.3 IMPLEMENTATION OF THE PLAN

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

33 The BED shall use the following guidelines to determine if an event has met the requirements of
34 WAC 173-303-360(2)(d):

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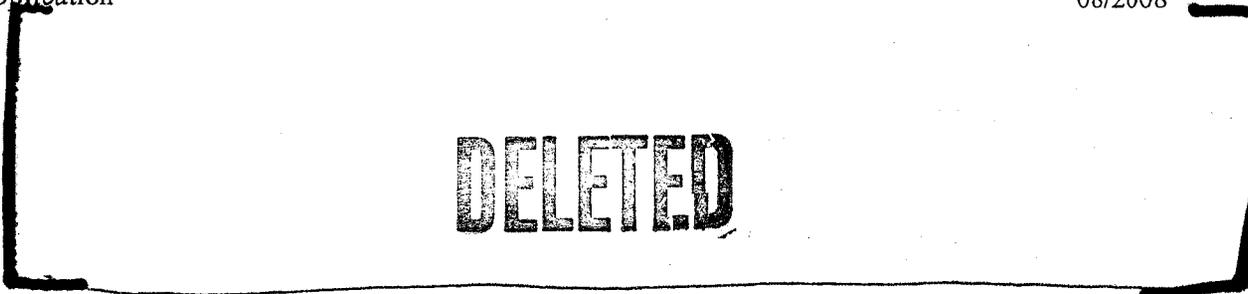
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As soon as possible after stabilizing event conditions, the BED shall determine, in consultation with the FH site contractor environmental single-point-of-contact, if notification to Ecology is needed to meet WAC 173-303-360 (2)(d) reporting requirements.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

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

The BED must assess each incident to determine the response necessary to protect the personnel, facility, and the environment. If assistance from Hanford Patrol, Hanford Fire Department, or ambulance units is required, the Hanford Emergency Response Number (911) must be used to contact the POC and request the desired assistance. To request other resources or assistance from outside the LLBG, the POC business number is used (373-3800).

7.3.1 Protective Action Responses

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

Evacuation

If an evacuation is ordered or the evacuation siren sounds in the area of the LLBG, personnel shall proceed to the staging areas depicted in Figures 7-1 and 7-2.

The BED or Staging Area Manager directs evacuations; however, to ensure that evacuations can be conducted promptly and safely, all personnel must be familiar with the correct evacuation procedure.

Area evacuations are rapid or controlled, as pointed out in the following steps. When possible, these steps must be performed concurrently.



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AREA EVACUATION PROCEDURE

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1 **7.3.2 Response To Facility Operations Emergencies**

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

7 **7.3.2.1 Loss of Utilities**

8 A case-by-case evaluation is required for each event to determine loss of utility impacts. When a BED
9 determines a loss of utility impact, actions are taken to ensure dangerous and/or mixed waste is being
10 properly managed, to the extent possible given event circumstances. As necessary, the BED will stop
11 operations and take appropriate actions until the utility is restored.

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23 **7.3.2.2 Major Process Disruption/Loss of Plant Control**

24 N/A

25 **7.3.2.3 Pressure Release**

26 N/A

27 **7.3.2.4 Fire and/or Explosion**

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7.3.2.5 Hazardous Material, Dangerous and/or Mixed Waste Spill

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

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- 1 • Hanford Fire Department stabilizes the spill.

2 **7.3.2.5.1 Damaged or Unacceptable Shipments**

3 During the course of receiving dangerous and/or mixed waste at LLBG, an unanticipated event could be
4 discovered resulting in a conformance issue concerning the waste. In some cases, the conformance issue
5 will result from receiving an off-site shipment, manifested pursuant to Permit, Condition I.P.1 or
6 WAC 173-303-370 that is damaged or otherwise presents a hazard and cannot be transported. Damaged
7 or unacceptable shipments resulting from onsite transfers are not subject to WAC 173-303-370; however
8 conformance issues must be resolved in order to maintain proper records.

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16 **7.3.3 Prevention of Recurrence or Spread of Fires, Explosions, or Releases**

17 The BED, as part of the ICP, takes the steps necessary to ensure that a secondary release, fire, or
18 explosion does not occur. The BED will take measures, where applicable, to stop processes and
19 operations; collect and contain released wastes and remove or isolate containers. The BED shall also
20 monitor for leaks, pressure buildups, gas generation, or ruptures in valves, pipes, or other equipment,
21 whenever this is appropriate.

22 **7.3.4 Incident Recovery and Restart of Operations**

23 A recovery plan is developed when necessary in accordance with Permit Attachment 4, *Hanford*
24 *Emergency Management Plan* (DOE/RL-94-02), Section 9.2. A recovery plan is needed following an
25 event where further risk could be introduced to personnel, the LLBG, or the environment through
26 recovery action and/or to maximize the preservation of evidence.

27 If this plan was implemented according to Section 7.3 of this plan, Ecology must be notified before
28 operations can resume. Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02),
29 Section 5.1 discusses different reports to outside agencies. This notification is in addition to those
30 required reports and must include the following statements:

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

33 The notification required by WAC 173-303-360(2)(j) may be made via telephone conference. Additional
34 information that Ecology requests regarding these restart conditions will be included in the required
35 15-day report identified in Section 7.5 of this plan.

36 For emergencies not involving activation of the Hanford-EOC, the BED ensures that conditions are
37 restored to normal before operations are resumed. If the Hanford Site Emergency Response Organization

1 was activated and the emergency phase is complete, a special recovery organization could be appointed at
2 the discretion of DOE to restore conditions to normal. This process is detailed in DOE and contractor
3 emergency procedures. The makeup of this organization depends on the extent of the damage and its
4 effects. The onsite recovery organization will be appointed by the appropriate contractor's management.

5 **7.3.5 Incompatible Waste**

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

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

14 If incompatibility of waste was a factor in the incident, the BED or the onsite recovery organization
15 ensures that the cause is corrected.

16 **7.3.6 Post Emergency Equipment Maintenance and Decontamination**

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

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

23 **7.4 EMERGENCY EQUIPMENT**

24 Hanford Site emergency resources and equipment are described and listed in Permit Attachment 4,
25 *Hanford Emergency Management Plan* (DOE/RL-94-02), Appendix C. Emergency resources and
26 equipment for the LLBG are presented in this section.

27

1 **7.4.1 Fixed Emergency Equipment**

FIXED EMERGENCY EQUIPMENT		
TYPE	LOCATION	CAPABILITY
None		

2

3 **7.4.2 Portable Emergency Equipment**

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

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5 **7.4.3 Communications Equipment/Warning Systems**

COMMUNICATIONS EQUIPMENT		
TYPE	LOCATION	CAPABILITY
Hand-held radios	Portable	Communication

6

7 Note: Sitewide communications and warning systems are identified in Permit Attachment 4, *Hanford*
 8 *Emergency Management Plan* (DOE/RL-94-02), Table 5.1.

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1 7.4.4 Personal Protective Equipment

PERSONAL PROTECTIVE EQUIPMENT		
TYPE	LOCATION	CAPABILITY
DELETED		
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3 7.4.5 Spill Control and Containment Supplies

SPILL KITS AND SPILL CONTROL EQUIPMENT		
TYPE	LOCATION	CAPABILITY
DELETED		

5 7.4.6 Incident Command Post

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9 7.5 REQUIRED REPORTS

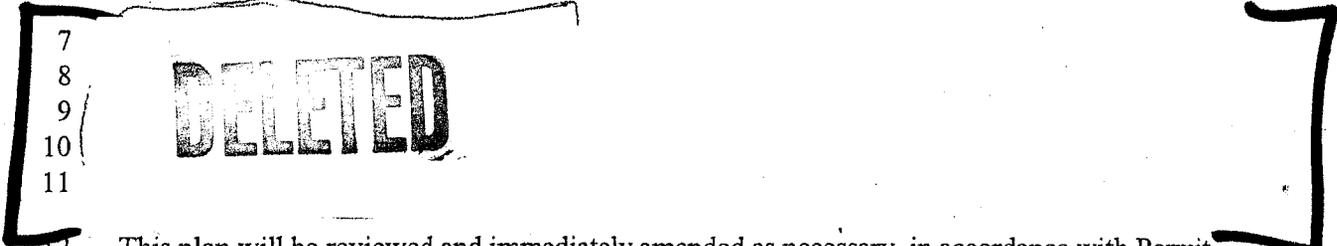
10 Post-incident written reports are required for certain incidents on the Hanford Site. The reports are
11 described in Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 5.1.

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- 1 Facility management must note in the TSD-unit operating record, the time, date, and details of any
- 2 incident that requires implementation of the contingency plan (Refer to Section 4.0 of this plan).
- 3 Within 15 days after the incident, a written report must be submitted to Ecology. The report must, at a
- 4 minimum, include the elements specified in WAC 173-303-360(2)(k).

5 **7.6 PLAN LOCATION AND AMENDMENTS**

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



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

14 **7.7 BUILDING EMERGENCY ORGANIZATION BUILDING EMERGENCY,**
15 **DIRECTOR**

LLBG BEDs		
TITLE	WORK LOCATION	WORK PHONE
Operations Management	MO-720 Complex West Area MO-247 East Area	372-3066 373-2147

16

17 Names and home telephone numbers of the BEDs are available from the POC (373-3800) in accordance
18 with Permit Condition II.A.4.

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Figure 7-1. Burial Grounds, 200 East Area.

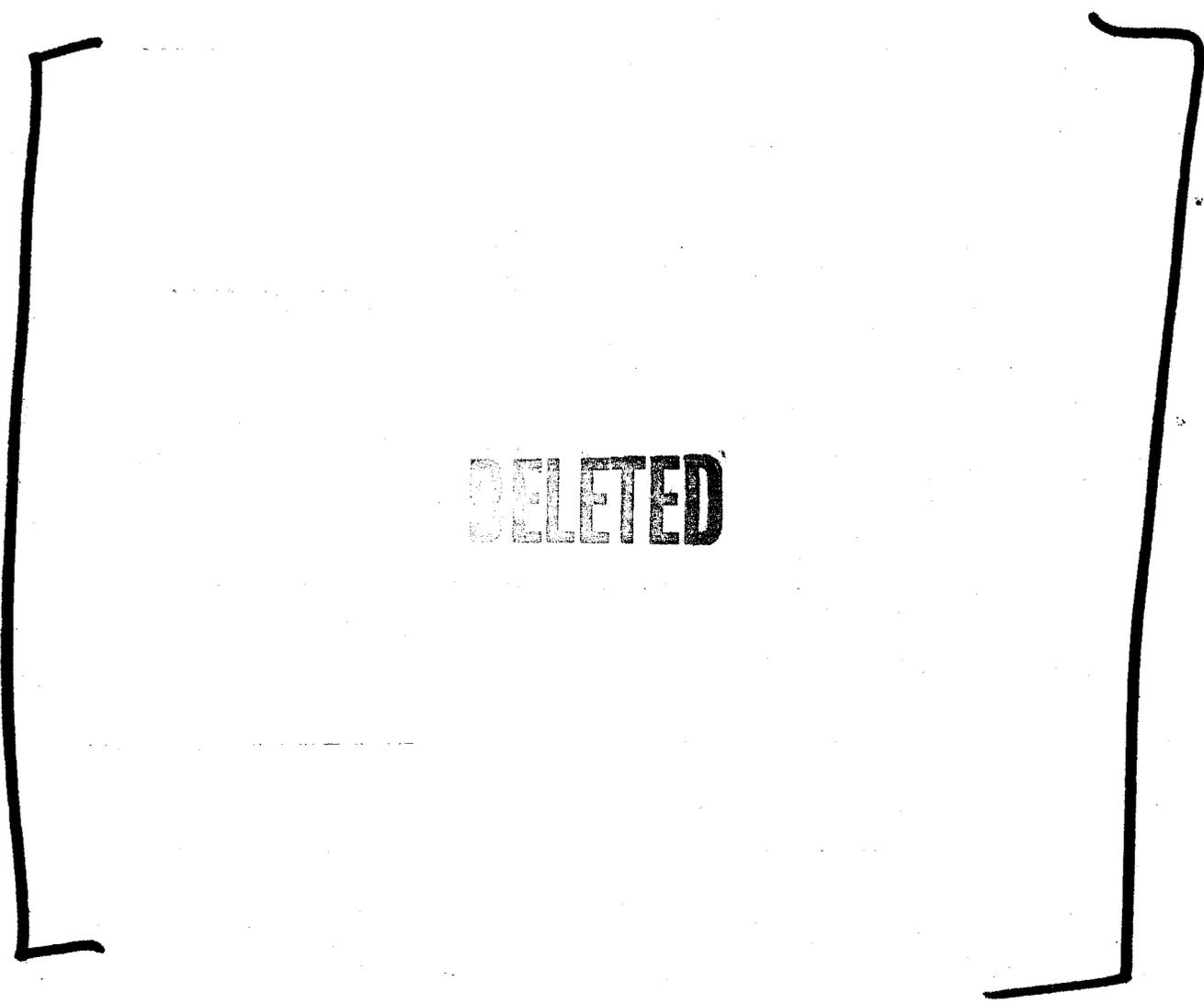
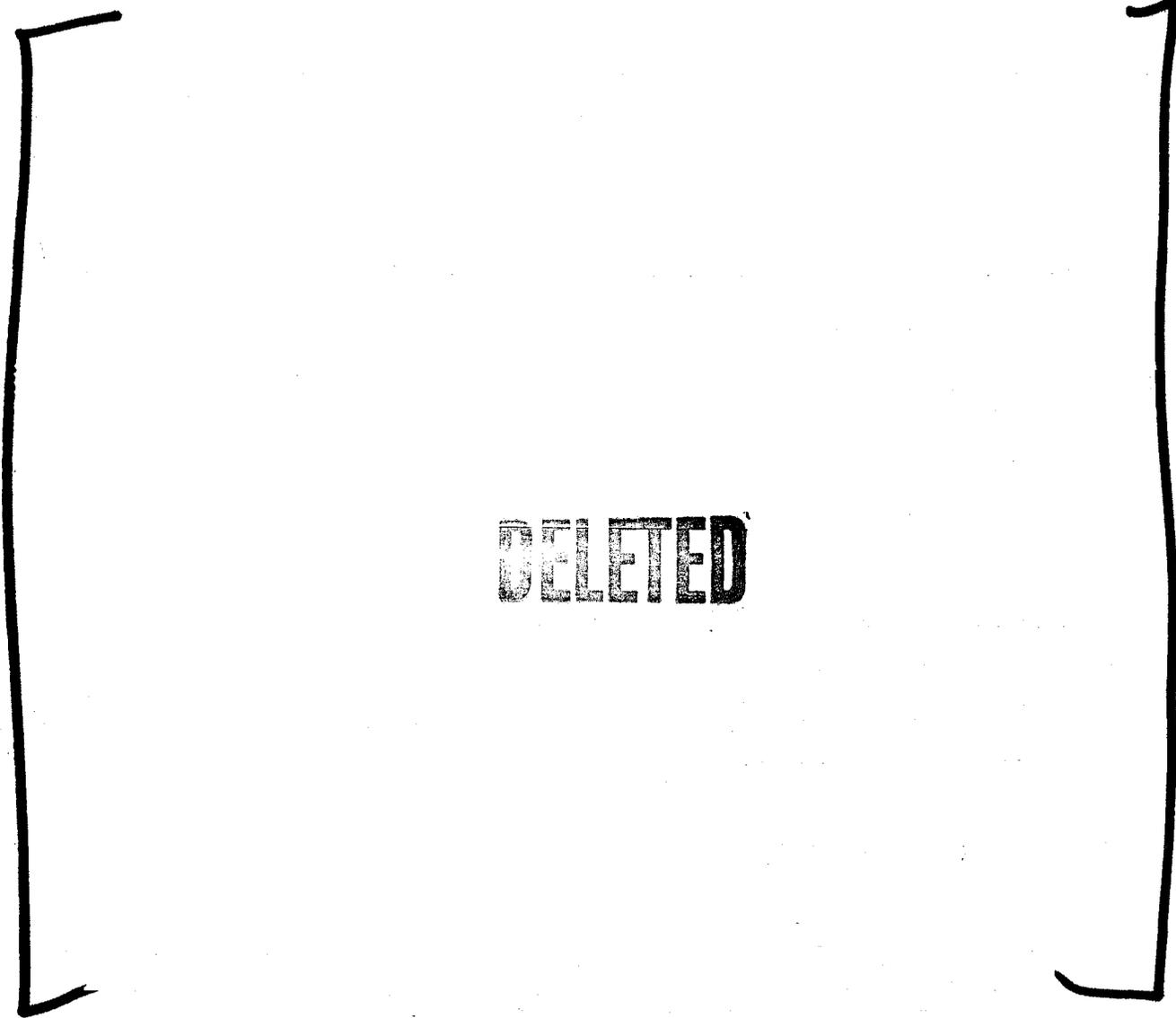


Figure 7-2. Burial Grounds, 200 West Area.



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