Subject: Permit application revisions
Date: Wed, 21 Feb 2001 19:25:43 -0700
From: Diane.L.Dwire@us.mw.com
To: stephanie_kruse@nmenv.state.nm.us
CC: Patrick.G.Corser@us.mw.com, Ken.Kloska@us.mw.com

Stephanie,

Attached are the 3 sections of our permit application (Vol I, Sections 4.0, 6.0, and 7.0) that we have revised as indicated in our February 14, 2001 letter. We have made edits in redline/strikeout mode, but be aware that previous revisions will also show when 'highlight changes' is turned on. Therefore, I have summarized the specific sections we revised to resolve the four recent outstanding items below:

Training Programs - Sections 7.2.1 and 7.2.1.2.
Lab QA/QC Plan - Section 4.7.2
Contingency Plan - Sections 6.3.5.3 through 6.3.5.5, and 6.3.8
Criteria to Assess Sample Representativeness - Section 4.3.3.1

Please call with any questions regarding these revisions. We are prepared to send hard copy replacements of these three sections as soon as we receive your approval that the outstanding issues are now resolved.

Diane

(See attached file: Section 7.doc)(See attached file: Section 6 Feb 2001 Revisions.doc)(See attached file: Section 4.doc)

cc: Dale Gandy (via fax)

Section 7.doc	**Name:** Section 7.doc **Type:** Winword File (application/msword) **Encoding:** base64 **Description:** Mac Word 3.0

Section 6 Feb 2001 Revisions.doc	**Name:** Section 6 Feb 2001 Revisions.doc **Type:** Winword File (application/msword) **Encoding:** base64 **Description:** Mac Word 3.0

Section 4.doc	**Name:** Section 4.doc **Type:** Winword File (application/msword) **Encoding:** base64 **Description:** Mac Word 3.0

6.0 CONTINGENCY PLAN

The purpose of the Contingency Plan is to minimize potential hazards to human health and/or the environment in the event of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or water. Should any of these unplanned events occur, the procedures in this Contingency Plan will be immediately implemented. When these procedures are followed, the possibility of additional occurrences, recurrences, or spread of the initial emergency in such a way as to require additional emergency response measures will be minimized.

This Contingency Plan was specifically developed for the Facility. A final contingency plan will be provided to NMED and other response agencies 60 days prior to initiation of operations. The plan will be kept at the Facility, and controlled copies will be submitted to and updated at all police and fire departments, hospitals, and state and local emergency response organizations that may be called upon to provide emergency services. A list of these organizations is provided in Appendix J of Volume II. Initial site tours with all local emergency response organizations will be conducted to familiarize them with the facility prior to the start of operations.

The plan specifies Facility personnel who will be responsible for implementation of the plan. The plan also specifies the actions these individuals will take in the event of an emergency at the Facility. The plan includes a (1) description of the Facility layout; (2) the location of possible hazards; (3) the location of emergency and decontamination equipment; (4) evacuation plans and routes; (5) agreements with local emergency personnel; and, (6) an up-to-date list of names, addresses, and telephone numbers of Facility personnel qualified to act as EC.

6.1 GENERAL RESPONSIBILITIES OF THE EMERGENCY COORDINATOR

The Facility will train a minimum of five employees to serve as the EC for the Facility. Only one individual at a time will be designated as the primary (on-duty or on-call) EC. Others will be specified as alternate ECs. A list of personnel qualified as ECs will be provided in Appendix K in Volume II prior to waste receipt. Individuals will be listed by name, address, and telephone number. The list will also indicate the order in which each will assume responsibility as ECs. In accordance with 40 CFR 264.52(d), which states, "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", the list will be provided to the director of the NMED or designee (NMED Director) prior to receipt of waste and will be kept current both at the Facility and with emergency response organizations.

An acting EC will be either physically at the Facility or on call 24 hours a day, 365 days a year. Each EC will have authority to commit resources needed to carry out the provisions of the Contingency Plan.

The EC will be responsible for implementing the Contingency Plan, coordinating all emergency response efforts, determining the extent of the emergency, assessing hazards to human health and the environment, and completing necessary reports associated with the incident. Each EC will be thoroughly familiar with (1) the Facility layout and operations; (2) all aspects of the Facility's Contingency Plan; (3) the location and characteristics of hazardous materials, hazardous waste, and waste handling activities at the Facility; (4) the location and operation of emergency response equipment; (5) evacuation plans and routes; and (6) the location of all Facility records.

After an emergency has been brought under control, the EC will assume responsibility for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that is generated as a result of the release, fire, or explosion at the Facility.

If the EC becomes injured or is otherwise unable to serve as EC during an emergency, a designated operations manager will assume the role of EC until an alternate EC is notified and arrives on the scene.

6.2 CIRCUMSTANCES DICTATING IMPLEMENTATION OF THE PLAN

The Contingency Plan must be immediately implemented under any of the following circumstances:

- a fire or explosion occurs resulting in the release of a hazardous waste or involving an active hazardous waste management unit;
- a spill, leak, or other release of hazardous waste or hazardous waste constituents to the air, soil, or surface water occurs that could threaten human health or the environment;
- an indoor spill, leak, or other release of hazardous waste occurs to a secondary containment area that is not removed within 24 hours; and/or,
- a hazardous waste incident occurs resulting in an injury requiring more than basic first aid.

The plan will be implemented any time the EC believes that an event occurring at the Facility has the potential to adversely affect human health or the environment. The plan may also be implemented for other reasons at the discretion of the EC.

During the initial discovery and assessment phase of an incident, the EC will obtain information, including the type and quantity of released material and/or injuries that have occurred. At this time, the EC may consult with environmental specialists and other appropriate personnel to determine whether the incident warrants implementation of the RCRA Contingency Plan.

6.3 IMPLEMENTATION PROCEDURES

Response procedures for emergencies often vary significantly, depending on the specific details of the incident. However, several response procedures are common to all incidents and include the following elements, which are further detailed in this section:

- discovery of incident and request for assistance from emergency response personnel;
- identification and characterization of released or suspected released material;
- assessment of hazard;
- off site notification and evacuation criteria;
- response and control procedures;
- measures to prevent recurrence or spread; and,

- storage and treatment of released hazardous waste.

6.3.1 Discovery of Incident and Request for Assistance from Emergency Response Personnel

The individual who first discovers an incident or emergency will quickly determine whether the situation is immediately life threatening or non-life threatening. The steps taken in each of these scenarios are briefly described below, although they are likely to vary based on occurrence.

6.3.1.1 Life-Threatening Situations

All Facility employees will be instructed and trained on response to a life-threatening situation or life-threatening release of materials. Employees will first relocate to a safe area, if necessary, then immediately notify the EC and/or emergency response personnel as the situation warrants, using the methods described below.

Verbal—In some cases, verbal communication within a building or between buildings will be the fastest way to disseminate emergency information and/or evacuate the area of an emergency.

Telephone—Employees will be instructed to immediately relocate to a safe area, if necessary; appropriate emergency response personnel can be notified by dialing 911 (without first notifying the EC if a particular situation appears to be immediately life-threatening or serious); the EC must be immediately notified of the actions taken.

Fire-Pull Station—The fire-pull station may also be used to alert the fire department and Facility personnel of an emergency. Although this type of alarm does not allow verbal communication with the fire department, it does activate a local fire alarm bell at the Facility and a remote alarm signal at the fire department.

Facility personnel will be trained for initial response to onsite fires. When the alarm is activated, onsite personnel may use fire extinguishers or the application of soil and/or water to suppress fires, when appropriate. The Roswell Fire Department will respond to fires beyond the control of site personnel. Response time for the Roswell Fire Department is approximately 30-45 minutes.

Fire-pull stations will be located at the administration building, the entrance to the landfill, the drum handling unit, and the stabilization unit. Other possible locations of fire-pull stations may be established.

Automatic Fire Detection/Sprinkler System—All permanent Facility buildings will be equipped with automatic fire detection/sprinkler systems, which, when activated, will transmit an alarm directly to the security gate guard shack and the Roswell Fire Department. The fire department will immediately respond to any alarms.

Public Address (PA) Or Paging System—Each of the main buildings will be equipped with a PA or paging system, which will be used to inform employees of adverse conditions at the site and emergency response instructions.

Hand-Held Radios—Hand-held radios will be used to communicate with personnel who are out of range of voice communications, PA, or are working in areas with noise levels such that render the PA system inaudible in emergency situations.

During non-operational hours, the EC will be notified by pager, radio, cellular telephone, or regular telephone. The EC will be at the scene as soon as possible to direct and coordinate emergency response activities.

If the EC determines that additional assistance from an off site agency or emergency response organization is needed or if immediate action is required to protect a local community population or to protect any visitors using the Mescalero Sands recreation complex and travelers at the rest stop on Highway 380 north of the Facility, the EC will contact the appropriate agencies or organizations. A list of these organizations is provided in Appendix J in Volume II. During response activities, two-way radios will be used for communication between responding groups and the EC.

6.3.1.2 Non-Life Threatening Situations

Upon discovery of a non-life-threatening release of materials or other non-life-threatening but potentially serious emergency situation, all Facility employees will be instructed and trained to immediately notify the EC or their supervisor. The EC will evaluate the situation, notify appropriate personnel, and if necessary implement the Contingency Plan.

6.3.2 Identification and Characterization of Released or Suspected Released Material

After the emergency situation has been discovered and appropriate response personnel have been contacted for assistance, the EC will immediately obtain the following information by process knowledge (his own or that of another employee): (1) observation; (2) review of Facility records, including material safety data sheets (MSDSs) and manifests; and/or, (3) chemical analysis of the material, if this becomes necessary. This information will determine the following:

- the character and amount of released waste;
- the exact source and extent of any released material;
- whether the release could move off site; if it is determined that the release could move off site, the EC must determine if any containment procedures have been implemented or whether such procedures should be implemented; and,
- any injuries or potential injuries resulting from the incident.

All containers of waste and material at the Facility will be labeled. Therefore, the identification and characterization work generally will be accomplished through visual inspection and process knowledge. Manifests and lists of the waste and locations of waste being stored at the Facility prior to disposal or treatment will be maintained at the Facility. This information will be used in lieu of the visual inspection noted above in cases where the danger of entering the incident area is high or the container labels have been obscured as a result of the incident.

Copies of the MSDSs for raw materials used at the site will be located in the administration building, in the EC's office, and at appropriate operations locations throughout the site. The information in these documents will be used to prepare a course of action.

6.3.3 Assessment of Hazard

Concurrent with the waste identification and characterization phase of the emergency response, the EC will assess possible hazards to human health or the environment that may result from the emergency situation. Indirect and direct effects of the release, fire, or explosion will be considered during this assessment. Examples of direct and indirect effects include the impacts 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.

During this phase of the emergency response, the EC will consider the following information to determine potential risk to human health or the environment:

- the location from which the material or waste is emanating;
- the weather patterns and wind direction at the time of the release; and,
- the characteristics of the released material, including physical, reactive, and human or animal toxicity.

The EC may choose to obtain emergency response guidance by contacting one or more of the emergency response organizations listed in Appendix J (Volume II) or by utilizing various spill control reference textbooks and MSDSs located in the EC's office.

6.3.4 Off Site Notification and Evacuation Criteria

If the EC determines that a release, fire, or explosion has occurred at the Facility that poses an immediate threat to onsite or off site human health and/or the environment, the findings will be reported to appropriate response personnel as follows:

- local authorities will be immediately notified if an emergency incident at the Facility could affect local areas and if evacuation of these areas is necessary. The EC will be available to assist appropriate officials in deciding whether local areas should be evacuated (evacuation plans are provided in Appendix L, Volume II); and,
- the local authorities will be notified with the following information:
    - ◊ the name and telephone number of the reporter;
    - ◊ the name and address of the Facility;
    - ◊ the time and type of incident that occurred;
    - ◊ the name and quantity of material(s) involved, to the extent that this is known;
    - ◊ the extent of injuries, if any; and,
    - ◊ the possible hazards to human health or the environment.

Coordinating agreements will be signed with federal, state, and local emergency response organizations. The agencies with which the Facility will enter these agreements are listed in

Appendix J presented in Volume II. The agreements outline the conditions under which the agencies will be contacted and the roles they will assume during various emergency scenarios at the Facility. The agreements establish the EC as the lead coordinator of all emergency response activities at the Facility. The details of these agreements will be located in the EC's office and with each of the participating organizations. The agreements will be considered controlled documents and will be kept current by updating all copies each time a change is made. This ensures a coordinated response to all emergency situations.

The EC may contact one or more of the agencies, such as police, fire departments, or hospitals, as listed in Appendix J (Volume II), if additional assistance is needed at the site to protect community populations.

6.3.5 Response and Control Procedures

Following proper notification of agencies and/or evacuation of the Facility, the EC will initiate response and control procedures. This effort will involve the use of emergency equipment, which is listed in Appendix M in Volume II. This list also includes equipment descriptions and locations.

Potential incidents for which response and control procedures are necessary will be grouped into three broad categories: (1) fires and/or explosions; (2) spills, leaks, or other releases; and (3) power failures. A brief discussion of emergency training requirements and the general procedures for handling each of these situations are described in the following sections.

Facility personnel and supervisors will receive safety training to enable them to respond to and handle various emergency situations that are not of a serious nature. In addition to this training, employees will participate in emergency response drills on a periodic basis. These drills will involve both internal responses and those response actions taken in conjunction with external emergency response personnel. Key personnel will be familiar with the use of emergency equipment and fire control structures available to prevent the spread of fires in their areas. To prevent recurrence of an incident, any faulty or defective monitoring equipment, valves, pumps, alarms, or other equipment will be repaired. If repair is not possible, the equipment will be replaced. The unit will not receive hazardous waste until the minimum required equipment for safe operation is fully functional.

Procedures for ensuring that incompatible wastes are not treated, stored, or located in areas where a spill has occurred are addressed in Section 6.3.7.

6.3.5.1 Fire and/or Explosion Control Procedure

If a fire or explosion occurs at the Facility that may impact an active hazardous waste management unit or hazardous material storage area, the Contingency Plan will be immediately implemented, as outlined in Section 6.3. The EC will assess the situation and direct the emergency response effort. The EC will also be responsible for advising emergency response personnel of the hazards associated with released materials and other areas that should be protected from the effects of the incident.

In the event that a fire cannot be brought immediately under control and hazardous waste or material are located in the path of the fire or in an otherwise dangerous place, the waste or materials will be relocated to a safer area, if possible. If this is not possible, the material may be sprayed with an appropriate fire suppressant, at the direction of the EC or under the advisement of fire department personnel.

If an explosion is likely to occur, for example because a fire threatens to envelop ignitable waste, the EC may choose to evacuate the area, as described in Appendix L presented in Volume II.

Facility employees will be trained and advised to stay in their work areas during emergency situations, unless they are in immediate danger, until they receive further direction via the PA system or other method of communication. If evacuation is necessary, the EC will communicate this via the PA system and by other means, as necessary, and all employees will assemble at the administration building. If anyone is unaccounted for, emergency response personnel will conduct searches.

After the affected areas have been evacuated, re-entry will be authorized by the EC only after the fire has been extinguished and when the emergency has been resolved.

Any equipment used during the incident will be checked for contamination and cleaned and/or replaced prior to resumption of plant operations in the affected area. Any solutions or materials used to decontaminate the equipment will be managed as RCRA-regulated waste.

6.3.5.2 Spills, Leaks, or Other Releases Control Procedure

All areas in which liquids are stored, managed, or potentially encountered (including tanks, containers, or secondary containment areas) will be inspected regularly for leaks, spills, deterioration, or damage in order to reduce the likelihood of an incident. However, on occasion, such incidents may still occur. This section describes the procedures for responding to spills, leaks, or other releases to containment areas or to the environment.

If Facility employees observe a spill, leak, or other release, whether during a formal inspection or during routine work, they will be instructed to contact the EC immediately and describe the situation in as much detail as possible, giving the following information, at a minimum:

- the location;
- material composition;
- approximate quantity; and,
- estimated extent of the release.

Based on this information (and additional investigation by the EC as necessary), the EC will determine whether to evacuate the area and/or implement the Contingency Plan.

As previously stated, if the EC is not available and if the situation is serious or life threatening, employees will be instructed to dial 911 for emergency assistance. In a life threatening situation personnel may call 911 without first notifying the EC. The EC will then be notified of the employee's actions. Upon notification, the EC will conduct a visual inspection of the release and will then implement immediate containment measures.

Releases Within Containment

The EC will implement the following procedures for responding to leaks or spills from tank systems or containers into secondary containment areas that are not likely to reach the environment:

- the tank system or secondary containment area will be removed from service and the flow of waste stopped;

- the unit will be inspected to determine the apparent cause of the leak or spill;

- all waste released to a secondary containment area will be removed from the secondary containment systems within 24 hours after detection of the leak, or as timely as possible, to prevent harm to human health and the environment;

- leaking containers will be placed in an overpack drum or will have the contents transferred to another container; and,

- affected tank systems will be repaired or replaced (if replaced, the old systems will be closed) prior to returning them to service. All released materials will be removed prior to returning the unit(s) to service. Extrusion repairs to geomembrane liners or metal welds to steel containers will be certified by a qualified registered professional engineer. This certification will be submitted to the NMED Secretary.

Releases to the Environment

The EC will implement the following procedures for responding to leaks or spills from units that are likely to reach the environment:

- as previously stated, if uncontrolled releases of ignitable, corrosive, reactive, or toxic materials are involved in the incident, the affected area will be evacuated;

- response personnel will be directed to the incident location to aid in preventing further migration of the leak or spill to soils or surface water, provided that this can be accomplished safely. This effort will involve the use of industrial absorbents, sorbent dams, or other similar materials. If the release is determined to be beyond the capabilities of Facility personnel, the EC will contact one of the emergency response organizations listed in Appendix J (Volume II) for assistance;

- the EC will monitor the status of the incident and direct emergency response personnel until the emergency condition no longer exists;

- when the incident has been brought under control, the EC will coordinate and instruct response personnel to begin cleanup and decontamination operations. These will involve containing and collecting any released material, including liquid releases, contaminated sorbent materials, visibly contaminated soils, and any other waste materials generated during cleanup or decontamination. These items will be removed and properly disposed of, generally by placing the wastes into DOT-approved containers (such as 55-gallon drums), sampling the waste or otherwise determining its constituents, and handling the waste accordingly. All liquids, including the originally released material and any liquids generated during cleanup (unless other circumstances or knowledge preclude this effort) will be pumped into drums and samples taken and analyzed to determine an appropriate course of action;

- if soils or surface water are visibly affected, they will be removed until the contaminant concentration in the remaining soil or water is at or below appropriate levels for the contaminants of concern;

- the EC will then use whatever means are necessary to determine if the released material is a hazardous substance as defined in 40 CFR 302. The EC will then determine whether the amount of released material is a reportable quantity. If the amount is a reportable quantity, the following steps will be taken:

    ◊ waste that could be released to the environment because of a leak in a tank system will be removed from the tank within 24 hours of the detection of the leak, or, if this is not possible (impracticability must be demonstrated to the NMED), it will be removed at the earliest practicable time. In such a case, as much waste as is necessary to prevent further releases to the environment will be removed from the tank system, enabling inspection and repair of the system;

    ◊ the EC will report the release to the NMED Director within 24 hours of detection;

    ◊ the National Response Center will be advised of the situation within 24 hours of the incident;

    ◊ an internal report describing the situation and corrective measures necessary to prevent a recurrence will be prepared; and,

    ◊ a written report will be filed with the NMED Director within 30 days of detection, as described in Section 6.4.2 and

- if the quantity of the spill or leak is less than or equal to 1 pound and is immediately contained and cleaned up or is less than a reportable quantity of material, a Facility employee will be assigned to report on the situation and determine what, if any, follow-up actions are necessary after cleanup.

6.3.5.3 Evaporation Pond Failure Control Procedure

The evaporation pond will be removed from service if the level of liquids in the pond suddenly drops and the drop cannot be attributed to known flowrate changes into or out of the pond or if they are exceeded. The major source of volume reduction from the pond is anticipated to result from evaporation. Liquid may also be pumped out of the pond, for example if a heavy rainfall event causes the water level to rise above the required freeboard elevation. Liquid levels in the evaporation pond will be monitored using a measuring staff gauged either in inches or in tenths of a foot. Daily evaporation losses will be compared to daily evaporation rates obtained from the nearest NOAA weather station. Currently this is the Bitter Lakes Wildlife Refuge station, as evaporation rates are not measured at the Roswell and Tatum stations. If liquid losses exceed daily evaporation losses and no other reasonable explanation is found, then the evaporation pond will be shut down and the authorities at NMED will be notified immediately.

When a pond must be removed from service, the following steps will be taken:

- the flow of waste into the pond will be immediately shut off;

- any surface leakage that has occurred will be contained;
- the leak will be stopped as soon as possible;
- any other necessary steps will be taken to stop or prevent a catastrophic failure of the unit; and,
- in the event that the leak cannot be stopped by any other means, the pond will be emptied.

Several options are available to empty an evaporation pond. Due to the two-sided nature of the single evaporation pond, if a leak occurs in one side, liquid can be transferred to the other side while repairs are being made. Other options, if the leak is on both sides of the pond, include setting up temporary double-lined ponds, temporary double-lined bladders, temporary portable double-lined tanks, or using tanker trucks. These short-term storage measures are intended only to allow storage capacity during a major pond repair effort. The wastes would be transferred into and out of the tanks using existing or temporary pumps.

- Notification will be made to the Chief of the Hazardous and Radioactive Materials Bureau. An oral report will be made within 24 hours. A written report will be submitted within 7 days. An unexplained drop in the level of the evaporation pond would qualify as a noncompliance that may endanger human health or the environment, and 40 CFR 270.30 (l)(6) requires 24-hour notification for such events.

A written procedure for complying with use of temporary double-lined ponds, double-lined bladders, portable double-lined tanks or tanker trucks will be included in the final contingency plan thatwill be prepared prior to the acceptance of waste at the Facility. This procedure will be written to ensure that all repairs will be made in accordance with approved designs, specifications, and CQA Plan for the pond. All repairs will be done under the supervision of a New Mexico registered professional engineer.

If the evaporation pond is removed from service, it will not be put back into service until it is repaired. If the unit was removed from service as a result of a sudden drop in the liquid level, and the drop in the liquid level was caused by failure of the liner, then either a new liner (in compliance with 264.221[a]) must be installed, or the old liner must be repaired and certified by a qualified engineer that it meets the design specifications approved in the permit. If the pond is not to be repaired, or is not repairable, it will be closed in accordance with the provisions of 264.228 and the approved closure plan.

In the event that the evaporation pond is removed from service due to actual or imminent failure of any portion of the pond dike system, the evaporation pond will not be placed back in service until necessary repairs are completed and inspected, and the structural integrity of the dike is recertified by a New Mexico registered professional engineer. This recertification process will be done in accordance with 40 CFR 264 .226(c) and 40 CFR 264 .227(d)(1).

GM will commit to having onsite all required equipment and emergency storage capability to remove all contents from the evaporation pond at all times. This will include available storage capacity in one side of the pond that is not leaking as well as in temporary storage units (bladders, tanks, or tanker trucks). This equipment will be located at the facility and will be owned by GM. Personnel who notice an impending impoundment failure will notify the Emergency Coordinator immediately following the observation.

The Emergency Coordinator will respond by immediately mobilizing an emergency response team from the maintenance department who will bring in double-liner bladders, tanker trucks, and heavy equipment, if necessary, to the evaporation pond site. The team will endeavor to identify the source of the failure. If it is concluded that the impoundment failure is resulting in a release of water to the ground surface, an interim containment dike will be constructed of soil materials adjacent to the pond. Downstream receiving stream users, groundwater users, and local government authorities will be immediately notified. Bladders, pumps, and tanker trucks will then be mobilized to recover water that is being impounded by the dike. If it is concluded that the impoundment failure is impacting groundwater with no evidence of surface expression, the team will implement immediate drawdown of the pond until the source of the failure is located or until all of the contents have been removed, whichever occurs first.

A program for conducting accelerated water quality monitoring will be immediately instituted by the Emergency Coordinator. Grab samples will be collected by the maintenance department from the surface stream monitoring points and groundwater monitoring well(s) and analyzed according to the facility's environmental monitoring plan. These results will be reported to the local authorities and NMED within 24 hours of receipt of results.

A corrective action plan will be developed by the maintenance department to repair the impoundment. The plan will include provisions for recovery and treatment of soils and released water. If a groundwater pump and treat program is required based on sample results to restore groundwater quality, this program will be designed and implemented by GM and approved by a New Mexico registered professional engineer and NMED prior to implementation.

A Personnel Decontamination Zone will be set-up near the evaporation pond. Field restoration of the evaporation pond will be conducted by maintenance department personnel who will be fitted with appropriate PPE.

Restoration activities including required construction quality assurance will be carried out under the supervision of the maintenance department supervisor. A New Mexico registered Professional Engineer will certify the completion of the pond repair. All environmental monitoring and remedial efforts will continue to be conducted until background water quality conditions are restored. All waters captured by containment dikes or tanker trucks will be placed back into the evaporation pond after restoration activities are completed and NMED's concurrence of successful completion of these activities.

Treatment and/or disposal of contaminated soils will be implemented by the maintenance department. The program for soil treatment/disposal will be developed by GM and approved by NMED prior to it implementation. Decontamination of all equipment used during these remedial activities will be conducted.

GM will report the results of these corrective action efforts and remedial progress to NMED on a regular basis until the evaporation pond is approved for operation or otherwise directed by NMED. GM will report to local authorities and NMED when all background environmental conditions have been restored.

6.3.5.4 Power or Equipment Failure Control Procedure

The Facility will be equipped with at least one backup generator for emergency power generation to critical equipment only, which may include the laboratory, stabilization unit and administrative equipment. The generators may also be used to power safety equipment, such as smoke detectors and tank emergency cut-off or bypass mechanisms. The details of this system will be made available

as the Facility design is completed. This emergency system will be started within 30 minutes of a power failure.
Equipment that fails but does not result in an emergency incident, such as a fire or explosion, will be promptly repaired or replaced. If emergencies arise as a result of the equipment failure, they will be handled as described in previous sections.

6.3.5.5 Stabilization Buildings Response Actions

In the event of a power failure at the facility affecting the stabilization building, the facility will implement a series of response actions until power is restored. Power is expected to be restored within 30 minutes from the emergency generator which will be installed at the facility. The response actions will address personnel evacuations and waste receiving cessation. The personnel will evacuate to a pre-designated assembly area as outlined by this Contingency Plan in Section 6.3.4. Several of these personnel will be tasked by the Emergency Coordinator to then leave the assembly area and visually monitor the stabilization building from a location specified by him and conduct air quality monitoring. The Emergency Coordinator will notify the Waste Receiving Department to cease the receipt of waste materials from the offsite generator and subsequent transfer of the material to the stabilization building. The Emergency Coordinator will monitor the duration of the power failure and will provide guidance to maintenance personnel who may need to approach the stabilization building to reset electrical systems regarding any chemical and physical hazards. The Emergency Coordinator may elect to request securing of waste containers or other vessels in the stabilization building if the power failure is expected to be prolonged. If this is the case, he will organize a team of stabilization building personnel to re-enter the building while donning appropriate PPE to inspect, then, if necessary, secure any containers or containment vessels to minimize environmental hazards.

6.3.6 Measures to Prevent Recurrence or Spread

During an emergency, the EC will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste areas at the Facility. These measures will include the following, where applicable:

- stopping processes and operations in specific areas of the plant or the entire plant itself; shut-down procedures for processing operations will be maintained in the administration building as well as at specific operating locations;

- collecting and containing released waste as described in Section 6.3.5.2; and,

- removing or isolating containers from the emergency at hand, as described in Section 6.3.5.1; if a material cannot be moved because of danger associated with a fire, the material may be sprayed with an appropriate fire suppressant, as directed by the EC or authorized fire official.

If the Facility ceases operations because of an emergency, the EC or a designated individual will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

A preventive maintenance order schedule will be prepared to ensure that monitoring equipment, valves, pumps, alarms, and other equipment will be maintained in good working order. If any of the equipment is found to be faulty or defective, it will be repaired or replaced.

6.3.7 Storage and Treatment of Released Hazardous Waste

Concurrently or immediately after the emergency has been addressed and cleanup procedures have been completed, the EC will make arrangements for the containerization and storage, treatment, or disposal of any waste generated during the incident. The waste will be assumed to be RCRA-regulated until process knowledge or sampling and analysis can be used to determine the actual nature of the waste. Sampling and analysis will be accomplished in accordance with the Waste Analysis Plan in Section 4.0. The material will be placed in DOT-approved containers and stored as RCRA-regulated waste in the drum-handling unit or roll-off container area until a determination is made. If the waste is determined to be RCRA-regulated, it will be labeled and stored accordingly until it is treated or disposed of in accordance with applicable RCRA regulations and permit conditions.

If the waste generated during the cleanup is determined to be incompatible with other wastes stored or treated at the Facility, the incompatible waste will be labeled as such and physically separated from other incompatible waste. In addition, existing waste at the Facility that may be incompatible with the waste generated during cleanup will not be treated, stored, or disposed of until cleanup activities are completed and the cleanup waste is safely containerized and segregated from the existing waste.

6.3.8 Equipment and Personnel Decontamination

6.3.8.1 Personnel Decontamination Zone

A personnel decontamination zone (PDZ) will be set up a safe distance away from the material release area by a team designated the Emergency Coordinator. The PDZ's location relative to the release area will be determined by the Emergency Coordinator. The PDZ will be comprised of a support zone, contamination reduction zone, and exclusion zone.

The PDZ will be set up to sequentially decontaminate equipment and personnel. The first level of decontamination will involve equipment or personnel containing the highest level of contamination. Final equipment and personnel decontamination will be verified by visual inspection. The decontamination procedure within the PDZ will generally comprise progressing through the contamination reduction zone and corridor followed by redress of personnel. The Contamination Reduction Corridor will be designed to control access into and out of the exclusion zone and will confine responding personnel to a limited area.

Also included in the Contamination Reduction Corridor will be the decontamination of monitoring devices and waste samples. Non-reusable items such as latex gloves, Tyvek suits and duct tape, and respirators will be properly collected and disposed of at an approved facility. Decontamination of equipment, monitoring devices, and waste samples is present below in Section 6.3.8.2, Equipment Decontamination. Decontamination efforts regarding personnel will be recorded including personnel identification, emergency response function, date and time of day entering and leaving the PDZ. The PDZ will be decommissioned when the emergency has been addressed and cleanup measures have been completed.

6.3.8.2 Equipment Decontamination

Sampling equipment including waste sample collection hardware, personal protective, and monitoring devices will be decontaminated in the Contamination Reduction Corridor prior to returning these items to their respective storage locations at the facility. Decontamination will involve scrubbing each item with a biodegradable detergent solution followed by thorough rinsing

with de-ionized water. This process will be repeated at least one time. Additional scrubbing/rinsing will be performed depending on the extent of contamination. The PDZ supervisor will conduct all recordkeeping with regard to decontamination efforts. He will note equipment, waste sample containers, and monitoring devices that were decontaminated. He will also note the number of detergent scrubbing/rinsing steps that were conducted. The PDZ supervisor will verify that all equipment, sample containers, and monitoring devices have been properly decontaminated prior to these items being returned to their respective storage areas for reuse. This verification will be based on a visual inspection of each item prior to its leaving the PDZ. All wastewater that was generated and collected during operation of the PDZ will be properly treated and/or disposed as directed by the Emergency Coordinator.

6.4 POST-IMPLEMENTATION PROCEDURES

Following implementation of the Contingency Plan and resolution of the incident, all emergency equipment used during the effort will be made ready for future use. Necessary reports will be prepared and filed at the Facility and with regulatory agencies. These post-implementation procedures are detailed in the following sections.

6.4.1 Post-Emergency Equipment Maintenance

All emergency equipment listed in Appendix M (Volume II) of this Contingency Plan will be cleaned, repaired, or replaced so that it is fit to use before plant operations in the affected area are resumed. If the equipment cannot be adequately cleaned, it will be disposed of as hazardous waste. If it cannot be repaired and is not contaminated, it will be disposed of as non-hazardous waste.

Documentation of post-emergency equipment maintenance will be provided to NMED prior to resumption of operations in the affected area of the plant.

6.4.2 Required Reports and Notification

During and after certain emergency situations, as described in previous sections of this plan, specific types of reports or notification will be required. The EC will determine when, or if, off site notification and reporting are required for certain scenarios. The various reporting and notification requirements are mentioned in the appropriate sections of the Contingency Plan but are detailed here for purposes of clarity.

After the plan has been implemented, if the EC determines that the Facility has had a release, fire, or explosion that could threaten human health or the environment outside the Facility, the EC must immediately notify either the government official designated as the on-scene coordinator for the geographical area or the National Response Center. The report must include the following information: (1) the name and telephone number of the reporter; (2) the time and type of incident; (3) the name and quantity of material(s) involved, to the extent that this information is known; (4) the extent of injuries, if any; and (5) the possible hazards to human health, or the environment, outside the Facility.

If the EC determines that evacuation of local areas may be advisable, appropriate local authorities will be immediately notified. The EC must be available to help appropriate officials decide whether local areas should be evacuated.

Any release to the environment which threatens human health or the environment must be reported to the NMED Director within 24 hours of detection. If the release is reported pursuant to 40 CFR

Part 302, that report will satisfy this requirement. Any release involving a reportable quantity of a hazardous waste as defined in 40 CFR 302.4 will be reported to the National Response Center within 24 hours.

Within 24 hours of implementing the Contingency Plan, the EC must notify NMED. The owner or operator must note in the operating record the time, date, and details of any incident that requires implementation of the Contingency Plan.

As required by 40 CFR 264.56(j), within 15 days of the incident, the EC must submit to the NMED Director a written report on the incident. The report must include the following information: (1)

the name, address, and telephone number of the owner or operator; (2) the name, address, and telephone number of the Facility; (3) the date, time, and type of incident; (4) the source and cause of any release to the environment; (5) the name and quantity of material(s) involved; (6) actions taken to mitigate damage due to the release; (7) the extent of injuries, if any; (8) an assessment of actual or potential hazards to human health or the environment, where this is applicable; and (9) the estimated quantity and disposition of recovered material that resulted from the incident.

Within 30 days of detection of a release to the environment, a report containing the following information will be submitted to the NMED Director: (1) the likely route of migration of the release; (2) the characteristics of the surrounding soil (soil composition, geology, hydrogeology, climate); (3) the results of any monitoring or sampling conducted in connection with the release, if available (if sampling or monitoring data relating to the release are not available within 30 days, these data must be submitted to the NMED Director as soon as they become available); (4) the proximity of the incident to downgradient drinking water, surface water, and populated areas; and (5) a description of response actions that were taken or are planned.

The NMED Director and state and local authorities will be notified when the Facility is in compliance with 40 CFR 264.56(h), which states that no waste that is incompatible with the released material can be treated, stored, or disposed until cleanup procedures are completed, and all equipment must be fit for its intended use prior to resuming operations.

6.5 DOCUMENTS TO BE MAINTAINED ONSITE AS PART OF THE PERMIT

Following the resolution of emergencies, various documents must be prepared and maintained onsite as part of the operating record. These documents are discussed in previous sections of this plan and are summarized below.

Copies of the Facility- and building-specific evacuation plans will be maintained in the administration building and at each location for which evacuation plans will be prepared. These documents will be submitted to the NMED within 30 days of the effective date of this permit.

An up-to-date list of all satellite and 90-day accumulation areas, if any are utilized at the Facility, will be maintained at the Facility and provided to the NMED inspectors upon request. Prior to accepting waste at a satellite or 90-day accumulation area for the first time, NMED will be provided with a description and location map.

A list of authorized ECs and their home telephone numbers will be maintained in the administration building, in all other buildings and emergency stations at the site, and in all controlled copies of the Contingency Plan.

A list of coordinating agreements that outline the situations and criteria under which outside help is needed will be maintained in the administration building and in all controlled copies of the Contingency Plan. This list will include the role of each emergency response authority in an emergency.

Coordinating Agreements will be put in place with local, state, and federal agencies for responding to emergency incidents that may occur at the Facility. The Facility will formalize Coordinating Agreements with those organizations listed in Appendix J (see Volume II) no later than 60 days prior to receipt of first waste.

A current evacuation plan will be maintained in the EC's office. Appendix L presented in Volume II provides a general Evacuation Plan for the Facility. The Facility will finalize this Evacuation Plan with details of building-specific evacuations after the Facility design has received final approval from NMED. It is proposed that the Facility will submit the criteria for determining when site evacuations are necessary within 30 days of the effective date of the permit and that final evacuation plans and procedures be submitted following final NMED approval of the Facility design.

A current version of the emergency and spill response equipment list presented in Appendix M (Volume II) will be maintained in the EC's office and in each of the controlled copies of the Contingency Plan.

The operating record for the facility will be updated with the time, date and details of any incidents that require implementation of the Contingency Plan.

6.6 AMENDMENT OF CONTINGENCY PLAN

If the Contingency Plan is implemented, the circumstances under which it was implemented will be thoroughly reviewed to investigate the following:

- why the incident occurred and the cause for the occurrence;
- what measures were taken to prevent a recurrence; and,
- what measures will be taken to reduce the risk of having a similar occurrence in the future.

The Contingency Plan itself will be reviewed by the EC and/or the Facility owner and immediately amended, if necessary, whenever any of the following events occur:

- the Facility permit is revised;
- the plan fails in an emergency;
- changes occur to the Facility design, construction, operation, maintenance, or other circumstance that materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or that change the response necessary in an emergency;
- the list of ECs changes; or,
- the list of emergency equipment changes.

Because the Contingency Plan is a controlled document, any changes will be made in the following manner: (1) inaccurate or out-of-date pages will be directly replaced with new pages containing the modified or additional information; (2) the corrected pages will be issued to all agencies and organizations that have controlled copies of the plan; and, (3) old pages will be removed from copies of the plan and discarded. These steps will ensure that each organization has a current version of the plan.

- waste tracking procedures and profile forms,
- laboratory waste acceptance procedures,
- laboratory recordkeeping,
- waste pre-acceptance,
- waste discrepancy and rejection procedures,
- operation of onsite laboratory,
- proper analytical methods,
- laboratory quality assurance and quality control,
- laboratory safety and waste handling within the laboratory,
- laboratory and environmental monitoring equipment calibration,
- basic chemical concepts, and
- toxicology overview and exposure pathways.

Waste Handlers and Maintenance Personnel

Specific classroom training OJT elements received by waste handlers and maintenance personnel will include:

- proper field sampling and testing procedures (waste handlers only),
- heavy equipment operations,
- waste handling precautions including chemical and physical hazards associated with each waste that will be handled onsite,
- drum and roll-off container handling,
- safety equipment,
- basic chemical concepts
- hand and power tool safety and operation (maintenance personnel only),
- lock out/tag out procedures,
- waste compatibility issues,
- waste segregation procedures in storage and during treatment,
- storage area operations
- waste treatment selection procedures,
- waste tracking procedures and profile forms
- sampling recordkeeping procedure, and
- treatment data form procedure.

Emergency Coordinator

Specific classroom training and OJT elements for emergency coordinators will include:

- site emergency communications procedures,
- federal, state, and local agency emergency and all-clear notification procedures,
- qualitative and quantitative assessment of released materials,
- human health and environmental hazard recognition,
- release containment procedures,
- facility-wide fire, explosion, and leak detection procedures during emergency responses and normal operations,
- procedures for recovering, treating, storing, and disposing of recovered waste, soil, organic liquid, and water resulting from an emergency response,
- emergency equipment decontamination and reuse procedures,
- emergency response recordkeeping plan, and
- written reporting requirements to the agencies.

Site Security Officers
Specific classroom training and OJT elements for site security officers will include:

- procedures for controlling entry to the facility,
- maintaining overall facility security including perimeter fence inspections, and
- maintenance of all warning signs.

7.2.1.3 OSHA 40-Hour Training

All personnel who handle hazardous waste and the supervisors of personnel who handle hazardous waste will complete OSHA 40-hour training as required by 29 CFR 1910.120. It is anticipated that, at least initially, the OSHA 40-hour training will be provided by an outside vendor. Personnel who have documentation of course completion for the 40-hour and refresher training will not be required to retake the 40-hour training.

7.2.2 Training for Visitors

Visitors who are expected to be in the Facility for only a short period of time and who will not be handling hazardous waste will be provided a short briefing on basic emergency procedures such as decontamination, emergency signals and alarms, and evacuation routes. Visitors will not be allowed onsite unless they are escorted by Facility personnel or unless other arrangements have been made with Facility personnel. The briefing will include the following information:

- what hazards that may be encountered at the Facility;
- how emergencies are signaled or announced, how help is summoned , what information is to be given, and to whom the information is given;
- where to report during an emergency;
- how to safely evacuate from the Facility;
- what standard operating procedures for visitors are;
- where check-in/check out locations are; and,
- what safety equipment is required.

7.2.3 Training for Off Site Emergency Response Organizations

Training will be established for off site emergency response organizations through agreements with local agencies and contracts with vendors. This training will include, as appropriate, the following:

- site layout and site-specific hazards;
- the Contingency Plan;

- Facility emergency procedures;
- Facility decontamination procedures; and,
- appropriate response techniques.

7.3 RECORD KEEPING

In accordance with 40 CFR 264.16, records regarding job title, job description, training, and other appropriate documentation will be kept by the RCRA training officer.

7.3.1 Job Titles, Descriptions, and Duties

Job titles will be designated for each position at the Facility related to hazardous waste management and the name of each employee filling each job. Job descriptions will detail job duties and responsibilities for that position. The description will include the skills, education, and qualifications required for each position. A written description for each position will be maintained to determine the types and amounts of both introductory and continuing training to be given to each employee at the Facility.

7.3.2 Training Documentation

Records that document RCRA classroom training and OJT given to and completed by Facility personnel will be kept by the RCRA training officer. Training records on current employees will be kept until closure of the Facility. Training records on former employees will be kept for at least three years from the date the employee last worked at the Facility.

7.3.3 Other Documentation

Other documentation to be maintained at the Facility, includes the following:

- documentation of the annual review of the curriculum for RCRA classroom training;
- documentation of the annual review of the OJT checklists; and,
- RCRA classroom training test results.

Insert Figure 7-1, Facility RCRA Training Program

7.0 PERSONNEL TRAINING

The personnel training program for the Facility will be developed in accordance with 40 CFR 264.16 as adopted by the State of New Mexico in the New Mexico Hazardous Waste Management Regulations, Part V. This plan documents training procedures to be used by the Facility for all new employees and refresher training for experienced workers to ensure that all employees perform their work in full compliance with 40 CFR 264.16.

As illustrated in Figure 7-1, personnel will be divided into three categories for the purposes of the RCRA training: Facility personnel, visitors, and off site emergency response personnel. Facility personnel will be further categorized based on whether or not they will handle hazardous waste. Personnel will receive training appropriate to their specific job responsibilities. All Facility personnel will be required to complete classroom training within six months of employment and annually according to the requirements of the CFR 264.16. Employees who will handle hazardous waste and supervisors of employees who will handle hazardous waste will be required to complete on-the-job training (OJT) and OSHA 40-hour training and annual refreshers. Employees assigned to the Facility will not be allowed to work without direct supervision until completing the training program relevant to the positions in which they are employed. New personnel will be required to complete their training program as soon as practicable, but no later than six months, following their effective date of employment at the Facility.

Section 7.1 describes job titles, qualifications, and duties; Section 7.2 describes training content and frequency; and Section 7.3 describes record keeping procedures.

7.1 JOB TITLES AND DUTIES

To facilitate safe and effective Facility operation, the training program is designed to provide training commensurate with job responsibilities. A list of qualifications, duties, and special training required for appropriate personnel will be developed and maintained onsite prior to commencement of operations. This section includes a description of the qualifications and responsibilities of the RCRA training officer, the EC, waste handlers, the site security officer, laboratory specialists, and maintenance personnel. Although other categories of personnel may work at the site, these six categories include key personnel with respect to ensuring safety and compliance and therefore are included in this section. It is important to note that one person may fulfill the responsibilities of more than one of the job categories outlined below.

7.1.1 RCRA Training Officer

The RCRA training officer will be responsible for developing and implementing a RCRA training program that is in compliance with 40 CFR 264.16, Personnel Training.

The RCRA training officer will possess the following qualifications:

- a four-year science or engineering degree or sufficient experience in hazardous waste management to oversee the training program;
- working knowledge of the New Mexico Hazardous Waste Act and the New Mexico Hazardous Waste Management Regulations;
- knowledge of site-specific hazardous waste management procedures;

- a thorough understanding of the purpose of the Contingency Plan and emergency procedures and the ability to implement them; and,

- 40-hour OSHA and annual refresher training.

The RCRA training officer will have the following responsibilities:

- developing and implementing the RCRA training program, including classroom training development and revision;

- establishing course curricula;

- conducting training;

- maintaining and updating, as needed, a list of all employees requiring training; this list will provide a personalized training history for each employee, which includes job title, training schedule, course attendance, and test results;

- reviewing any new job classifications to determine if on-the-job-training (OJT) is required (supervisors may also request that employees receive OJT);

- scheduling training;

- ensuring that all personnel with RCRA responsibilities are trained as soon as practicable following the effective date in a position and are annually updated; and,

- conducting an annual review to determine which personnel require OJT.

7.1.2 Emergency Coordinator

The EC will coordinate all emergency response activities and will have the authority to commit the resources necessary to implement the Contingency Plan contained in Section 6.0. The Facility will appoint a primary EC as well as secondary ECs to ensure that someone is always available to serve as the EC. The secondary ECs must meet the same qualifications and responsibilities, outlined below, as the primary coordinator.

The EC will possess the following qualifications:

- a four-year science or engineering degree or sufficient experience in hazardous waste management and emergency response to coordinate all aspects of emergency response;

- working knowledge of the New Mexico Hazardous Waste Act and the New Mexico Hazardous Waste Regulations;

- familiarity with all aspects of the Contingency Plan and emergency procedures, all operations and activities at the Facility, the location and characteristics of waste handled, the location of records within the Facility, and the Facility layout prior to acting as EC; and,

- 40-hour OSHA training, annual refreshers, and OSHA supervisor training.

The EC will have the following responsibilities:

- either being on the Facility premises or being available to respond to an emergency by reaching the Facility within a short period of time;
- notifying all appropriate Facility personnel upon awareness of an emergency situation;
- notifying all appropriate state or local agencies with designated response roles;
- identifying the character, exact source, amount, and extent of any released materials;
- assessing possible hazards to human health and the environment that may result from a release, fire, or explosion;
- notifying local authorities if a release, fire, or explosion has occurred that could threaten human health or the environment;
- notifying the National Response Center if a release, fire, or explosion occurs that could threaten human health or the environment;
- taking all reasonable measures during an emergency to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the Facility;
- if appropriate, when the Facility ceases operations in response to a release, fire, or explosion, monitoring for leaks, pressure build-up, gas generation, or ruptures in equipment;
- providing for the 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;
- ensuring that no waste that may be incompatible with the released material is treated, stored, or disposed until cleanup procedures are completed and that emergency equipment is cleaned and fit for its intended use prior to resumption of operations;
- notifying NMED and appropriate local authorities before operations are resumed;
- noting in the operating record the time, date, and details of any incident that requires implementing the Contingency Plan; and,
- submitting a written report to the NMED within 15 days of implementing the Contingency Plan.

7.1.3 Waste Handlers

Waste handlers will perform sampling, screening, unloading, transfer, storage, and loading of material.

The waste handlers will possess the following qualifications:

- high school diploma or equivalent; and,
- two years of experience in hazardous waste operations.

The waste handlers will have the following responsibilities:

- verifying waste received;
- testing emergency equipment;
- inspecting Facility and emergency equipment;
- managing containers in such a way as to prevent leaks, spills, and ruptures;
- inspecting container storage areas, tanks, the evaporation pond, and the landfill;
- inspecting roll-off containers and drums for cracks or holes.
- repair of defects on roll-off containers and drums.
- inspection of non-regulated but potential SWMU units;
- maintaining run-off management system, control wind dispersal, and ensure compliance with other operational requirements specific to the RCRA permit;
- assisting in maintaining the operating record; and,
- preparing biennial reports, unmanifested waste reports, and other reports as necessary.

7.1.4 Site Security Officers

The site security officers will control access to the Facility, ensure site security, and possess high school diplomas or equivalent.

The site security officers will have the following responsibilities:

- controlling entry, at all times, through gates or other entrances to the active portion of the Facility;
- ensuring site security;
- inspecting the perimeter fence to prevent unknowing entry and prevent the unauthorized entry of persons or livestock onto the active portion of the Facility; and,
- initially locating and then maintaining warning signs that indicate "Danger - Unauthorized Personnel Keep Out" in both English and Spanish, which will be posted on the perimeter fence and will be legible from a distance of 25 feet.

7.1.5 Laboratory Specialist

The laboratory specialist will help to assure that wastes received at the Facility are consistent with waste profiles supplied by generators.

The laboratory specialist will possess the following qualifications:

- a four-year science degree or sufficient experience to adequately perform acceptance testing;
- working knowledge of the New Mexico Hazardous Waste Act and the New Mexico Hazardous Waste Regulations; and,
- familiarity with the Waste Analysis Plan and waste analysis practices and procedures.

The laboratory specialist will have the following responsibilities:

- developing sampling, characterization, and testing procedures for waste received and generated at the Facility;
- directing or performing sampling, characterization, and testing for the Facility;
- determining if waste is acceptable for treatment, storage, and disposal according to waste profile information submitted by the generator;
- determining if the initial and annual full chemical analysis and fingerprint ~~testing~~analysis confirm~~s~~ generator information provided on the waste profile and manifest; and,
- implementing the laboratory QA/QC program.

7.1.6 Maintenance Personnel

Maintenance personnel will maintain all equipment, buildings, ~~and~~ roads and ditches.

Maintenance personnel will possess the following qualifications:

- high school diploma or equivalent; and,
- two years experience in an industrial setting.

Maintenance personnel will have the following responsibilities:

- developing maintenance procedures; and,
- performing maintenance-type activities, including repairs, preventive maintenance, and corrective actions associated with RCRA inspections.

7.2 TRAINING CONTENT AND FREQUENCY

Section 7.2.1 describes the training program for Facility personnel, Section 7.2.2 describes training for visitors, and Section 7.2.3 describes training for off site emergency response organizations.

7.2.1 Training Program for Facility Personnel

All new employees will be required to successfully complete the training program related to their position. Training programs will include RCRA classroom training, ~~OJT~~job specific training, OSHA 40-hour training, and annual refresher training for all three programs. ~~The~~ OJT and OSHA 40-hour training sessions will be required only for those personnel who will handle hazardous waste and the supervisors of personnel who will handle hazardous waste. Employees will not be permitted to assume unsupervised job duties until successful completion of all the required elements of their training program. As soon as practicable following a new employee's hire date, successful completion of the training program specific to his or her position must be accomplished, and certification of the completion will be recorded and kept on file by the RCRA training officer.

7.2.1.1 Classroom Training

The initial classroom training will consist of at least one 8-hour session. Annual refresher training will consist of at least one 4-hour session. The outline of the annual refresher is the same as the outline for the initial classroom training; however, the refresher training will be an abbreviated version of the initial training at an accelerated pace. The RCRA classroom training will include the following goals:

- developing a basic understanding of the regulatory requirements for a treatment, storage, and disposal facility;
- promoting understanding of policies and procedures necessary to protect human health and the environment;
- ensuring proper management of hazardous waste; and,
- educating employees regarding response to emergencies.

The outline for the RCRA training class will consist of the following elements:

- an introduction to RCRA, including a general description of RCRA and Hazardous and Solid Waste Amendments (HSWA); the definition of hazardous waste; waste generator requirements; treatment, storage, and disposal requirements; and labeling, inspection, record keeping, and reporting requirements;
- requirements associated with the RCRA permit for the Facility;
- Facility-specific waste management, including general procedures for receipt and handling of waste from off site as well as management of waste generated onsite;
- decontamination procedures;

- emergency procedures, including response to fires, explosions, and releases, and shutdown of operations;
- emergency equipment location and use;
- emergency systems- such as- the- communication and alarm systems and the fire suppression system;
- Contingency Plan;
- evacuation plan;
- waste minimization;
- occupational health and safety, including items such as personal protective clothing and equipment, general industrial safety, and employee Right-to-Know (the Hazard Communication Standard);
- transportation of hazardous waste, including marking, labeling, placarding, loading, use of shipping papers, record keeping, and other DOT requirements; and,
- maintenance of documentation.

Facility tours and audio-visual aids in conjunction with lectures and procedure manuals will be utilized in the classroom training. A written test will be administered at the completion of classroom training. A grade of 80 percent or better will be required to demonstrate mastery of the course material. The course curriculum will be reviewed at least annually by the RCRA training officer to ensure that it is current and appropriate.

7.2.1.2 Job-Specific Training

The RCRA classroom training will be supplemented with ~~OJT~~job specific training tailored to each employee's actual job responsibilities. Job specific training may include additional classroom training and/or OJT. All employees who handle hazardous waste and supervisors of personnel who handle hazardous waste will be required to complete OJT~~; employees who will not handle hazardous waste and will not directly supervise personnel who will handle hazardous waste will not receive OJT~~. The purpose of OJT is not to demonstrate to personnel how to perform their duties, but rather to demonstrate how to perform their duties safely and in compliance with RCRA.

OJT will be conducted in the work area by the line supervisor or foreman subsequent to classroom training. The length and complexity of the OJT will vary according to the employee's responsibilities~~; however, it is anticipated that OJT will take approximately 1 to 2 hours~~. These minimum OJT sessions shall be documented by both the employee and the supervisor by signing and dating a form. The form shall also indicate the length of time spent on OJT training. The signed forms shall be maintained as part of the Operating Record as discussed in Section 7.3.

A checklist developed by the work area supervisor will be used for ~~OJT~~job specific training. Prior to initial use of the checklist, it must be reviewed and approved by the RCRA training officer. All employees performing similar duties will have consistent ~~OJT~~job specific training. The ~~OJT~~job specific training checklist will be reviewed at least annually to ensure that it is current and appropriate for the subject job classification.

The ~~OJT~~ job specific training checklist will include the following elements:

- information about procedures relevant to the individual's position, where these procedures are located, and which personnel have the authority to implement the procedures; key operating parameters and waste feed cut-off systems;
- location and use of communications or alarm systems;
- response to releases;
- emergency and routine shutdown of operations;
- Facility Contingency Plan and emergency procedures;
- evacuation procedures and location of emergency exits;
- response to leaks, spills, and overflows;
- Waste Analysis Plan procedures; and,
- inspection and maintenance procedures.

~~After the OJT checklist has been completed, it will be signed by both the employee and the supervisor. The checklist will be provided to the RCRA training officer, who will be responsible for maintaining training records.~~

Based on the checklist, GMI will develop a training outline specifically for each job specific training program. The training program outlines for procedures specific to incident response positions, laboratory positions, waste handling positions, and maintenance positions will be submitted to NMED for approval at least 60 days prior to initiation of operations. Each of these training programs is discussed below along with those for the Emergency Coordinator and Site Security Officers.

Incident Response Personnel

Classroom and training and OJT for on-site individuals involved in incident response shall focus on the emergency response equipment present at the facility. The training will address the use, maintenance, operation, purpose and limitations of the following specific equipment:

- fire-specific control equipment,
- personal protective equipment (PPE),
- spill control and decontamination equipment,
- emergency equipment,
- monitoring and communications equipment,
- shutdown operations,
- safety equipment,
- lock out/tag out program, and
- continuous air monitors.

Laboratory Personnel

Specific classroom training and OJT elements for laboratory personnel involved in analysis of hazardous waste will include: