

ATTACHMENT 8
PREPAREDNESS AND PREVENTION

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ACRONYMS

CAL	Chemical Assessment Laboratory
CFR	Code of Federal Regulations
NFPA	National Fire Protection Association
NO	Nitrogen oxide
NO ₂	Nitrogen dioxide
TEAD	Tooele Army Depot
TEAD-S	Tooele Army Depot-South
TOCDF	Tooele Chemical Agent Disposal Facility

8.1 **DOCUMENTATION OF PREPAREDNESS AND PREVENTION
REQUIREMENTS [R315-8-3.3; R315-8-3.6]**

8.1.1 **Equipment Requirements**

8.1.1.1 The Tooele Chemical Agent Disposal Facility (TOCDF) is in the final stage of closure. The facility still maintains an inventory of emergency equipment. Telephone and public address loudspeakers are available throughout the facility and in all work areas for use in case of emergencies. The telephone system is available for internal as well as external communications. Portable fire extinguishers are also available.

8.1.1.2 Pumps are installed at the existing wells to produce the anticipated 616,000 gallons per day required at Tooele Army Depot-South (TEAD-S), formerly Deseret Chemical Depot. The well pumps supply water to two reservoirs (with a combined capacity of one million gallons). These reservoirs supply the water distribution system at TEAD-S to include the reduced requirement of TOCDF.

8.1.2 **Aisle Space Requirements**

8.1.2.1 The S-2 warehouse will be used for container storage during final closure. The storage areas are arranged to provide efficiency in container storage; to provide adequate access for fire-fighting and proper maneuvering of a forklift; to meet minimum fire code requirements; and to allow easy access for personnel and equipment, which is needed for inspections and emergency operations.

8.1.2.2 There is a minimum of 2.5 feet of aisle space associated with the containers stored in the S-2 warehouse. An aisle space will be available for fork lift operation in the S-2 warehouse.

8.2 **PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT
[R315-3-2.5(b)(8)]**

8.2.1 **Loading/Unloading of Hazardous Waste [R315-3-2.5(b)(8)(i)]**

8.2.1.1 Secondary waste is stored and transported to the S-2 warehouse in accordance with R315-8-9.

8.2.2 **Reserved**

8.2.3 **Runoff [R315-3-2.5(b)(8)(ii)]**

8.2.3.1 At TOCDF runoff from all hazardous waste handling areas to other areas of the facility or the environment is prevented by facility design features. Waste handling in the S-2 warehouse takes place in an enclosed building. This should minimize the potential for precipitation runoff to reach the storage area of S-2. All liquid-bearing hazardous waste containers in S-2 are stored on secondary containment pallets properly sized to hold the contents of the containers.

8.2.4 **Water Supplies [R315-3-2.5(b)(8)(iii)]**

8.2.4.1 The storage of all hazardous waste at the TOCDF takes place in enclosed structures with concrete bases that prevent the downward percolation of wastes or liquids.

8.2.4.2 Back flow preventer systems are installed at potential cross connections to preclude any back flow of contaminated liquids into the potable water distribution system. These systems are installed and maintained in accordance with the Utah Public Drinking Water Rules, Section R309-102-5, under the authority of the Utah Division of Drinking Water.

8.2.5 **Equipment and Power Failure [R315-3-2.5(b)(8)(iv)]**

8.2.5.1 **TOCDF Equipment Failure Control**

8.2.5.1.1 There is no equipment left operating at the TOCDF. All Hazardous Waste Management Units (HWMUs) except for S-2, which is permitted for greater than 90-day container storage, have been decommissioned.

8.2.5.2 **Reserved**

8.2.5.3 **Emergency Power**

8.2.5.3.1 The use of the emergency power systems was discontinued with the decommissioning of the HWMUs they supported complete.

8.2.6 **Personnel Protection Equipment [R315-3-2.5(b)(8)(v)]**

8.2.6.1 Various levels of protective clothing are required at all facilities to protect workers from the effects of the agent in the work environment. The type of protective clothing worn by the workers is based on the level of protection required by the location, the process, and the type of hazard.

8.2.7 **Reserved**

8.3 **PREVENTION OF IGNITION OR REACTION OF IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE**

8.3.1 **Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste [R315-3-2.5(b)(9) and R315-8-2.8(a)-(c)]**

8.3.1.1 Ignitable waste at the facility includes waste generated and subsequently stored in the S-2 warehouse. No sources of ignition will be allowed in the S-2 warehouse when ignitable items are stored without a hot work permit to analyze and mitigate the fire hazard. Potential sources of ignition to be prohibited include: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat producing chemical reactions), and radiant heat. "No Smoking" signs will be placed at the entrances to the S-2 warehouse.

8.3.1.2 With the exception of the addition of chemical decontaminant or absorbent, no treatment of wastes within the containers in the S-2 warehouse will occur (i.e., S-2 warehouse will be used for storage only). This fact, coupled with the procedures identified in paragraph 8.3.3 regarding management of incompatible waste and the

procedures identified above regarding the management of ignitable, will prevent the types of reactions described in R315-8-2.8(b).

8.3.1.3 Reserved.

8.3.1.4 Reserved.

8.3.1.6 Both firefighting and evacuation are possible options in an emergency situation. If the fire is so large that it cannot be extinguished with the equipment at hand, the personnel involved shall evacuate and seek safety.

8.3.1.7 A fire in any other part of the plant is regarded as a serious event requiring immediate attention and corrective action. All fires inside the building are to be reported immediately and corrective action instituted immediately.

8.3.1.8 Since any fire inside a building will consume oxygen and generate gases that cannot support life within a given enclosed space, it is imperative that the presence of a fire be communicated rapidly and traffic into an affected area be restricted to only those personnel prepared to fight a fire safely. Again, no distinction is to be made between "small" or "large" fires, or the type of fire. Immediate response to communicate the presence of a fire and immediate corrective action is mandatory.

8.3.2 **General Precautions for Handling Ignitable or Reactive Wastes or Accidentally Mixing Incompatible Wastes [R315-3-2.5(b)(9) and R315-8-2.8(b)]**

8.3.2.1 General precautions for handling ignitable and reactive waste are discussed above. Procedures which prevent mixing of incompatible wastes in the S-2 warehouse are provided in section 8.3.3.

8.3.3 **Management of Incompatible Wastes in Containers [R315-3-2.6(d) and R315-8-9.8(a)(2)]**

8.3.3.1 Containers with incompatible site-generated wastes shall not be placed on a secondary containment pallet in the S-2 warehouse at the same time. Therefore, incompatible wastes, or incompatible wastes and materials shall not be placed in the same container or on the same secondary containment pallet.

8.3.4 **Management of Ignitable or Reactive Wastes in Tanks [R315-3-2.7 [40 CFR 270.16(f)] and R315-8-10 [264.198(a)(2)]]**

8.3.4.1 Hazardous waste is not generated, accumulated or stored in tanks at the TOCDF during final closure.

8.3.5 **Management of Incompatible Waste in Tanks [R315-3-2.7 [40 CFR 270.16(f)] and R315-8-10 [264.199(b)]]**

8.3.5.1 Hazardous waste is not generated, accumulated or stored in tanks at the TOCDF during final closure.