



August 4, 2025

Sent via e-mail, no hard copy to follow

Martin P. Krentz
Federal Project Director
DOE Environmental Management Consolidated Business Center
U.S. Department of Energy
2425 River Road
Niskayuna, NY 12309

**RE: Request for Minor Modification - Hazardous Waste Management Permit
DOE SPRU Field Office
Town of Niskayuna, Schenectady County
EPA ID No.: NYR000096859
UIS Site ID: 447011
DEC Permit #: 4-4224-00024/00055**

PERMIT MODIFICATION

Dear Mr. Krentz:

The Department has completed its review of SPRU's July 22, 2025 request for modification(s) to the above-referenced Permit. These modifications, consisting of changes to Attachment G (Contingency Plan and Quick Reference Guide) and Attachment M (Permit Modification Log), have been determined to be a minor modification. The changes reflect an updated RCRA Contingency Plan.

Pursuant to 6 NYCRR 373-1.7(c)(2)(v), the proposed changes do not substantially alter permit conditions or reduce the capacity of the facility to protect human health or the environment. The permit pages enclosed with your request are approved. These pages supersede the existing like-numbered pages of the Permit issued September 5, 2024 or those subsequently modified. All other terms and conditions of the permit remain as previously issued and/or modified. Please replace the pages in your copy of the permit and in all copies held in document repositories for this facility.

In accordance with 6 NYCRR Part 373-1.7(e), you are required to send an announcement of all modifications to all persons/parties on the facility mailing list, to units of local government, and to each State Agency having authority over the operation of the facility. Please copy the Department on correspondence that fulfills this requirement.

If you have any questions or comments regarding this modification, please contact me at frank.zhang@dec.ny.gov or 518-402-8755.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Zhang', with a stylized flourish at the end.

Frank Zhang
Assistant Engineer
HW Corrective Action and Post Closure

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US Department of Energy
SPRU, SP-26
2425 River Road
Niskayuna, New York 12309

7/22/25

EMCBCNY-25-081

Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4 Office
1130 North Westcott Road
Schenectady, New York 12306

Subject: Request for Permit Modification: Updated RCRA Contingency Plan

Reference: Part 373 Hazardous Waste Management Permit, NYSDEC ID# 4-4224-00024/00055,
Issued September 5, 2024

Dear Regional Permit Administrator:

The Department of Energy Separations Process Research Unit (DOE-SPRU) Part 373 Permit governs storage of twenty-two containers of mixed waste at the Knolls Atomic Power Laboratory (KAPL) TAA-003 storage area. With this letter, DOE is requesting a modification to the permit to update the RCRA Contingency Plan (Attachment G). The Contingency Plan currently included in the Permit was developed and signed by DOE. The updated Plan included in this modification request was developed by DOE's contractor, North Wind Site Services, and functions as an Emergency Response Plan for all its activities at KAPL. The North Wind Site Services Plan also serves as the RCRA Contingency Plan for the permitted mixed waste storage area.

DOE has included a permit modification log (Attachment M) as required by the Part 373 Permit. Following approval of this permit modification request by NYSDEC, DOE will add the date of approval to the modification log and include the updated log in our Administrative Record and the RCRA permit docket.

Thank you for your review and consideration of this request. If you have any questions, please contact me at (513) 246-1050.

Sincerely,

JOHN ZIMMERMAN
Digitally signed by JOHN
ZIMMERMAN
Date: 2025.07.22
11:39:21 -04'00'

John P. Zimmerman
Director
U.S. Department of Energy
DOE Environmental Management Consolidated Business Center

Enclosures: Attachment G: Contingency Plan, dated 07/09/25
Attachment M: Permit Modification Log

cc: Melody Bell, DOE EMCBC
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ATTACHMENT G – CONTINGENCY PLAN

In accordance with the regulatory requirements set forth in 6 NYCRR 373-2.4 and 2.11(e), this Attachment has been developed to provide information concerning the contingency plan at the Separations Process Research Unit (SPRU) site located in Niskayuna, New York.



ERP-60080

Emergency Response Plan
Environmental Remediation, Demolition, and Removal
Services, Waste Management Services, and
Regulatory Services

Knolls Atomic Power Laboratory
Niskayuna, NY

Revision 7

Approved:

Applicability: KAPL Environmental Remediation, Demolition, and Removal Services, Waste Management Services, and Regulatory Services	Effective Date: 07/09/2025	Approver: Title:	Nathan Canaris Project Manager <i>Thomas Henry Wood for</i>
For the most recent revision, refer to the Project SharePoint Server.		Signature:	<i>Thomas Henry Wood</i>

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History of Revisions

Revision	Issue Date	Action	Description
0	10/08/2021	New document.	Initial issue.
1	10/18/2022	Document Revision	Addressing DOE comments received on 9/30/22 as part of North Wind Proposal Response to Task Order No. 2 / 89303322FEM400263 MOD 01 Revised Appendices A and B
2	10/31/2023	Document Revision	Inclusion of RCRA contingency scope and hazardous waste accumulation area information - Updated acronyms - Updated Purpose in Section 2 - Updated Spill Response Requirements and Capabilities in section 5.6 - Added Emergency Spill Response and 90/180-day accumulation waste table in section 5.6 - Updated Appendix A map
3	02/05/2024	Document Revision	Updated in preparation for TO5 activities: - Updated Appendix A Map to include the Red Pines Area for soil stockpile. - Included SRP-60080 as reference document. - Updated Appendix B, Emergency Contact List.
4	01/27/2025	Document Revision	- Incorporated SPRU TRU Waste Storage Area into plan in Section 2. - Added new Section 5.6.4 to include Hazardous Waste Types Stored in the SPRU TRU Waste Storage Area. - Updated Appendix B, Emergency Contacts List - Corrected a few minor typographical errors.

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Revision	Issue Date	Action	Description
5	05/20/2025	Document Revision	Incorporate Comments per 6 CRR-NY 373-2.4, <i>Contingency Plan and Emergency Procedures</i>
6	07/08/2025	Document Revision	Updated Appendix B, Emergency Contacts List
7	07/09/2025	Document Revision	Updated Appendix B, Emergency Contacts List

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ACRONYMS AND ABBREVIATIONS

AED	automated external defibrillator
AA	Accumulation Area
COR	Contracting Officer's Representative
CPR	cardiopulmonary resuscitation
DOE	US Department of Energy
EMCBC-NY	Environmental Management Consolidated Business Center – New York Project Support Office
ERP	Emergency Response Plan
ES&H	Environmental, Safety, and Health
ES&HM	Environmental, Safety, and Health Manager
JHA	job hazard analysis
KAPL	Knolls Atomic Power Laboratory
NFPA	National Fire Protection Association
North Wind	North Wind Site Services, LLC
OSHA	Occupational Safety and Health Administration
PM	Project Manager
RCRA	Resource Conservation Recovery Act
SPRU	Separations Process Research Unit
SSHO	Site Safety and Health Officer
TRU	transuranic

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1. INTRODUCTION

This Emergency Response Plan (ERP) defines North Wind’s emergency responsibilities, requirements, and capabilities at the Department of Energy’s (DOE) Knolls Atomic Power Laboratory (KAPL). The ERP is intended to meet the requirements of DOE-EM-002, *Emergency Preparedness Plan*, for the Environmental Management Consolidated Business Center-New York Project Support Office (EMCBC-NY).

DOE-EM-002; DOE O 151.1D, “Comprehensive Emergency Management System”; and contract to perform work at the EMCBC-NY project site at the KAPL requires contractor compliance and sub-tier flow-down. The contractor’s establishment and maintenance of a documented emergency management program that implements the requirements of applicable Federal, State, and local laws, regulations, and ordinances for fundamental worker safety programs (e.g., fire, safety, and security) is also required. Compliance with EMCBC-NY emergency management procedures and orders (e.g., DOE-EM-002; DOE O 151.1D) ensures implementation of the requirements of applicable Federal, State, and local laws, regulations, and ordinances.

2. PURPOSE

The purpose of the ERP for the EMCBC-NY Projects is to establish North Wind’s emergency response requirement that provides support to DOE by participating in KAPL’s emergency management program, including planning, preparedness, response, recovery, and readiness assurance per DOE O 151.1D.

This document also serves as the Q-Complex and Separations Process Research Unit (SPRU) Transuranic (TRU) Waste Storage Area EMCBC-NY site hazardous waste contingency plan and has been prepared to minimize hazards to human health and/or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water. This plan addresses the contingency plan and emergency requirements of 6 New York Codes, Rules & Regulations (NYCRR) 373-3.4, as appropriate, for the hazardous wastes present at the site. This plan and successor revisions will be maintained at the site. Provisions of the plan will be carried out immediately by the North Wind Emergency Coordinator whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment. This ERP meets the contractual requirement of an Emergency Plan describing emergency response capabilities.

3. SCOPE

This ERP applies to all North Wind Site Services, LLC, (North Wind) and its sub-tier personnel while present on the KAPL.

4. ROLES AND RESPONSIBILITIES

4.1 Project Manager

- The Project Manager (PM) is responsible for ensuring that all affected personnel receive and maintain current training as described by the ERP.

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- The PM is responsible for ensuring that all required resources (personnel, equipment, etc.) are available to implement this ERP as written.
- The PM, with assistance as needed from the Environmental, Safety, and Health Manager (ES&HM), is responsible for ensuring accountability of personnel during and after emergencies, including those reporting to safe refuges and assembly areas.
- The PM, with assistance as needed from the ES&HM, is responsible for interaction and communication with emergency response organizations deployed to assist with response.
- The PM is responsible for ensuring documentation of emergency occurrences and response actions, and initiating and completing required, client, and site notifications and reporting.
- The PM will act as the Emergency Coordinator in all cases where emergency response is justified.
- The PM may delegate responsibilities for worksite management of emergency response activities to other Line Managers. Worksite Line Management will assume control of the scene until control is transitioned to the responding Emergency Response Organization Incident Commander and/or the PM, as appropriate. Local worksite accountabilities will be controlled by assigned Line Management.

ATTENTION: Incidents and occurrences will be reported immediately by the North Wind Emergency Coordinator (PM) to the EMCBC-NY Contracting Officer's Representative (COR). In addition, HSP-60080-1105, "Incident Reporting and Investigation," provides the vehicle for immediate notification of *an incident, and initially available information, internally across senior management and relevant support staff.*

4.2 Environmental, Health, and Safety Manager

- The ES&HM is responsible for providing or arranging training to personnel assigned by the PM as described by the ERP.
- The ES&HM is responsible for the maintenance and implementation of this ERP.
- The ES&HM is responsible for regular inspections of equipment and postings associated with ERP.
- The ES&HM may delegate responsibilities for worksite emergency response support activities to the Site Safety and Health Officer (SSHO) assigned to the field or work task. The SSHO will support the assigned Line Manager during the management and notification process of the emergency condition, interfacing with the responding Emergency Response Organization Incident Commander and/or the ES&HM, as appropriate.

NOTE: *The ES&HM may be contacted by employees who feel the need to request supporting or clarifying information about the ERP or an explanation of their duties under the ERP beyond initial training.*

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4.3 Employees/Subcontractors

- North Wind employees and subcontractors are responsible for complying with this ERP.
- North Wind employees and subcontractors are responsible for making notifications to the PM and ES&HM of emergency and potential emergency situations and conditions.
- North Wind employees and subcontractors are responsible for responding to emergencies in a manner that neither puts them at undue risk, nor exceeds the scope of this ERP or their training or the capabilities of the available response equipment.

5. RESPONSE REQUIREMENTS

North Wind has two primary responsibilities regarding emergency response. The first is to understand and respond to emergency notifications generated by the KAPL. This is a training and response function. In the event of a KAPL emergency that is not associated with the work, North Wind, subcontractors, vendors, and visitors will comply with directions given by KAPL incident responders. Secondly, North Wind must monitor and respond to emergency situations that result from its own activities. North Wind will notify DOE-EM and KAPL of any emergency that has the potential to impact areas outside work areas. North Wind provides limited first responder capability and may serve in a support capacity. North Wind does not maintain staff or equipment for front-line emergency response. KAPL provides support for larger spills, fires, and emergency medical response/transport.

KAPL initiated alarms and announcements will be used to notify employees and subcontractors of emergency conditions.

North Wind will adhere to the requirements of DOE-EM-002, *Emergency Preparedness Plan*, regarding the use of Naval Reactors Laboratory Field Office/KAPL emergency categorization/classification criteria. Upon notification of an emergency event or condition, the PM or designee will notify the Designated DOE Representative and DCOR, and will categorize all occurrences, except operational emergencies, following the requirements in DOE O 232.2A for reporting criteria. EMCBC-NY Emergency Coordinator will make the initial categorization of an Operational Emergency (per DOE-EM-002) as promptly as possible, but no later than 15 minutes after event recognition, identification, or discovery, as required by DOE Order 151.1D, "Comprehensive Emergency Management System." DOE's Emergency Coordinator will also serve as the liaison between the site Emergency Operations Center personnel and North Wind. North Wind does not staff or train to support designated positions on the site(s) Emergency Operation Center cadre.

Primary hazards for work areas shall be identified in job hazard analysis (JHA) work control documents per HSP-60080-1101, "Project Hazard Analysis." North Wind does not maintain control of nuclear hazard category 1, 2, or 3 work areas or facilities and only uses chemicals in the same form, quantity, and concentration as a product packaged for distribution and use by the general public. As such, the development of facility-specific hazard surveys and assessments per DOE 151.1D are not required as these areas have no potential for emergency conditions to impact site personnel beyond the facility footprint or off-site residents. North Wind controls the addition of hazardous and radiological agents to its work areas through procedure HSP-60080-1101 and RPP-60080-6516, "Sealed Radioactive Source Control".

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Should North Wind be requested to support an emergency response to a facility under its control, North Wind shall coordinate re-entry plans, recovery, post-incident activities, communications, etc., with KAPL emergency management personnel (see Section 5.8 of this ERP).

5.1 Support Function

Per the contract, North Wind shall provide support to DOE by participating in the KAPL site emergency management programs, including planning, preparedness, response, recovery, and readiness assurance per DOE O 151.1D.

5.2 First Responder Capabilities

North Wind provides basic first aid, consistent with the Red Cross basic first aid course. At each project site, at least one individual qualified in basic first aid, cardiopulmonary resuscitation (CPR), and use of an automated external defibrillator (AED) will be available when field work is being performed. Training may be provided by the American Red Cross, American Heart Association, or National Safety Council. The ES&HM may evaluate alternate providers and grant equivalency. First aid kits shall be provided, inspected, and restocked when necessary. North Wind will provide an AED for remote job sites where formal emergency medical services (KAPL or municipal) have a response time outside the 4-minute goal specified in National Fire Protection Association (NFPA) 1710, "Organization and Deployment of Fire Suppression Operations, EMS and Special Operations in Career Fire Departments."

When at KAPL, North Wind, subcontractors, vendors, and visitors will be made aware of notification requirements (as described in this ERP) which will initiate the response of trained personnel for first aid, CPR, and AED needs during initial site entry safety briefings, Site Orientation Training, and when necessary due to changes in requirements. The EMCBC-NY- Project Emergency Contacts List is available in Appendix B of this ERP and shall also be posted in common areas.

5.3 Occupational Medicine (Non-Emergency)

North Wind and its subcontractors shall have a relationship or a contract in place for local occupational medicine physicals and treatment of non-life-threatening emergencies. Non-emergency occupational medicine is discussed in HASP-60080, *Health and Safety Plan*.

5.4 Emergency Medical Response

Per the contract, KAPL will provide emergency medical response for life-threatening emergencies such as heart attack, stroke, and heat exhaustion. This includes transportation by site ambulance to the nearest hospital. When at KAPL, North Wind, subcontractors, vendors, and visitors will be made aware of notification requirements (see Appendix B) which will initiate the response of site emergency medical services responders for medical emergencies during initial site entry safety briefings and in the event of changes. Such information shall also be posted in common areas.

5.5 Fire Response Requirements and Capabilities

Per the contract, KAPL emergency services shall be notified of all fires and will respond with onsite resources or offsite assistance via mutual aid agreement. During initial site (KAPL) entry safety briefings

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and in the event of changes, North Wind, subcontractors, vendors, and visitors will be made aware of notification requirements (as described in this ERP; see Appendix B) which will initiate the response of fire services responders for fires. Such information shall also be posted in common areas.

Factory Mutual or Underwriters Laboratory-listed fire extinguishers will be staged in accordance with National Fire Protection Association 10 and Occupational Safety and Health Administration (OSHA) requirements and on all work vehicles and powered equipment. Fire extinguishers shall be provided for welding, burning, hot work, and refueling activities. North Wind shall inspect project site fire extinguishers on a monthly basis, and all extinguishers shall be maintained in accordance with state/local annual inspection requirements. North Wind personnel are trained on basic fire extinguisher usage as defined by OSHA for those employees who may elect to fight fires that have not exceeded the incipient phase. Personnel should not attempt to fight fires beyond those in the incipient phase.

5.6 Spill Response Requirements and Capabilities

As defined by contract, North Wind does not maintain emergency spill response capabilities beyond those necessary to control incidental spills and releases. North Wind shall be responsible for response to spills and releases of less than 5 gallons of hydraulic fluid, oil, grease, gasoline, and hazardous wastes/materials. Spill kits compatible with these materials will be available at the work site for stabilizing the area. For spills larger than can be managed by a spill kit (greater than 5 gallons), KAPL emergency services will be called for support. When at KAPL, North Wind, subcontractors, vendors, and visitors will be made aware of notification requirements which will initiate the response of incident responders for large spills during initial site entry safety briefings and in the event of changes. Such information shall also be posted in common areas. General actions to be taken in the event of a spill >5 gallons are listed in Section 5.6.2. Waste types potentially encountered during a spill/emergency event are listed in Sections 5.6.3 and 5.6.4.

5.6.1 Emergency Responses for Spills

When any emergency is observed, such as a fire, explosion, injury, or hazardous material spill, employees will notify the KAPL emergency response organization from a cell phone. You must describe the location and nature of the emergency.

Initiate your call with **“I have an emergency. I have an emergency.”** Then announce your identity, specific circumstances, and location, and wait for specific instructions.

- Phone Number: 518-612-5599. This is the number to call the KAPL emergency response organization. Note: Dialing 911 from a cell phone does not contact the KAPL emergency response organization and will only delay response.

5.6.2 Discovery of Spill and Immediate Actions

INITIATE the following actions upon discovery of a spill.

SWIM(s):

A. **STOP WORK immediately.**

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- B. **WARN** personnel in the immediate area and **NOTIFY** the Supervisor / Designee in the facility that a spill has occurred.
- C. **ISOLATE THE AREA** (close valve, place collection device under leak, etc.) to minimize the spread of contamination.
- D. **MINIMIZE EXPOSURE** by taking the necessary actions to keep personnel who are not vital to the response actions away from the area.
- E. **SECURE** unfiltered ventilation (if working within a facility).

Spill material should be prevented from entering floor drains, building sumps, sewer lines, or other systems providing access to the environment. Perform any additional actions necessary to minimize exposure to personnel and the environment. Spill Response actions are to be performed to HASP-60080, *Health and Safety Plan* and SRP-60080, *Spill Response and Reporting Plan*.

5.6.3 Hazardous Waste Types Potentially Stored in 90/180-Day Accumulation Areas (AA) Onsite

1. Lead Metal and Lead/Heavy Metal-contaminated Debris (e.g., circuit boards, paint chips, DAW)
2. Radioactive Lead Solids
3. Used Lamps/Bulbs (various types – primary hazards mercury and lead)
4. Used Batteries (various types – primary hazards acids (wet-type) and heavy metals)
5. Mercury-containing Thermostats
6. PCB-contaminated Used Oil (<50ppm and >50ppm)
7. PCB Ballasts
8. PCB Bulk Product (>50 ppm)
9. PCB Remediation Waste (>50 ppm)
10. Soil, Concrete/Debris, Investigation Derived Waste (IDW) or Water from an Area of Concern (AOC)

NOTE: *Appropriate personnel protective equipment shall be worn as required when controlling / containing a spill per the Safety Data Sheet(s).*

5.6.4 Hazardous Waste Types Stored in the SPRU TRU Waste Storage Area (TAA-003)

There are 24 containers of waste stored inside conex containers at TAA-003, of which 22 containers are mixed waste that are hazardous for metals (D007, D008, D009, and D011). All wastes are in solid form, with the exception of vials of mercury in nested containers inside Drum 162146 which is stored on a spill containment pallet.

Containers 140081 and 140131 are not RCRA hazardous waste but do present a radiological hazard. All containers that are RCRA hazardous waste have hazardous waste labels readily visible on either the container and/or lead shielding blankets around the container.

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5.7 Emergency Safe Refuges, Assembly Areas, and Evacuations

Based on KAPL requirements and specific emergency conditions, North Wind and subcontractor personnel shall follow site incident responders' instructions regarding the use of safe refuges, shelter-in-place locations, emergency assembly areas, and evacuation routes (see Appendix A for Assembly Areas). Subcontractor personnel arriving at assigned locations shall notify the PM, Line Manager, or ES&HM to ensure accountability. If any personnel are not accounted for, the PM, Line Manager, and/or ES&HM shall notify the on-scene Incident Commander and DOE. Safe refuges for severe weather (e.g., lightning, high winds) shall include work vehicles and grounded/anchored trailers (i.e., on-site field office, and other approved locations as discussed in the morning tailgate meetings), unless directed otherwise by the site's emergency management personnel. Supervision personnel may also relocate personnel during an emergency to remove them from imminent danger or exposure to hazardous substances (e.g., smoke plumes, emergency vehicle travel paths, electrical lines).

If an emergency occurs where evacuation is necessary, communication to evacuate will be completed through the use of project assigned radios. The message will be stated as "Evacuate Site Immediately" and will be repeated 3 times. All personnel must proceed to respective Muster Points as shown in Appendix C, *KAPL Evacuation Route*, if evacuation is ordered.

NOTE: *When working multiple job sites, the PM and ES&HM will delegate responsibilities for implementation of immediate emergency actions and response on individual job sites to the assigned Line Manager and SSHO. The responsible Line Manager and/or SSHO will likely be the initial interface with the responding Emergency Response Organization Incident Commander until the PM and ES&HM arrive on-scene.*

5.8 Additional Emergency Requirements

For emergencies not described above, personnel and subcontractors shall follow site incident responders' instructions regarding safe actions and compliance with DOE-EM-002, *Emergency Preparedness Plan*.

The KAPL Incident Commander or EMCBC-NY Emergency Coordinator will notify of emergency termination based on predetermined set of criteria for terminating an Operational Emergency. Emergency termination occurs when emergency response activities are terminated, the situation has been stabilized, potential threats to workers, the public, the environment, and national security have been characterized, conditions no longer meet established emergency categorization criteria, and it appears unlikely that conditions will deteriorate.

For emergencies initiating in work areas, or otherwise directly associated with work, North Wind shall be responsible for re-entry plans, recovery, post-incident activities, and communication. Reentry activities shall be planned and properly and safely accomplished in accordance with approved guidance, and recovery and post-emergency activities shall commence in a timely and efficient manner. Prior to termination, North Wind shall identify and document in a draft recovery plan the actions necessary to restore the site/facility/activity to normal operations. The means must exist for estimating exposure to hazardous materials and for protecting workers and the general public from exposure during reentry and recovery activities. North Wind re-entry planning must include contingency planning to ensure the safety of re-entry personnel, such as planning for the rescue of re-entry teams. All individuals involved in re-entry must receive a hazards/safety briefing before emergency response activities consistent with federal, tribal, state,

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and local laws and regulations. The recovery plan will be reviewed and approved by the EMCBC-NY Emergency Coordinator. DOE will coordinate and update the KAPL Incident Commander as warranted.

The recovery organization must include accident investigation, as needed, to ensure accident investigation is conducted in accordance with DOE O 225.1B, “Accident Investigations,” current version (see HSP-60080-1105, “Incident Reporting and Investigation”). Recovery from a terminated operational emergency must include communication and coordination with state, tribal, and local government and other federal agencies.

To support post-incident reporting, North Wind will conduct an after-action review of the emergency response operation when it is activated for an actual incident or condition to identify lessons learned and/or corrective actions. If the emergency operations system was activated for an Operational Emergency, North Wind shall document the performance review in an after-action report. North Wind shall submit the after-action report to the EMCBC-NY COR for further dissemination to the site Emergency Response Organization. This report may be done in conjunction with the final occurrence report in accordance with DOE O 232.2, “Occurrence Reporting and Processing of Operations Information,” current version (see QAP-60080-164, “Occurrence Reporting”).

Site specific emergency response equipment is listed, along with its location, in Appendix D, *Fire Extinguisher Log*, and Appendix E, *Equipment List*.

6. EMERGENCY RESPONSE TRAINING

Prior to commencing work, all employees and subcontractors performing work at the KAPL will be briefed to, or will have read, this ERP. All personnel will be trained in basic site emergency notification and response requirements found in this ERP and project JHAs (as applicable), as well as the use and locations of safe refuges, emergency assembly areas, and evacuation routes (see Appendix A for Assembly Areas). North Wind personnel and subcontractors may participate in emergency drills and exercises and shall participate as directed in drills and exercises associated with the site’s emergency management program.

First aid/CPR/AED training shall be in accordance with Section 5.2 above.

In accordance with HSP-60080-1137, “Fire Protection and Prevention,” all employees will be trained in the basic use of portable fire extinguishers, which are provided for incipient (small stage) firefighting purposes only. North Wind and subcontractor personnel will be trained to the appropriate management and operations fire safety and emergency response programs at the respective work site.

North Wind personnel and subcontractors shall be trained to respond to spills and leaks of less than 5 gallons of hydraulic fluid, oil, grease, and gasoline. This training shall include applicable Safety Data Sheet information, focusing in particular on hazard identification, accidental release measures, exposure controls/personal protection, and disposal considerations. Training for limited spill response to hydraulic fluid, oil, grease, and gasoline shall include the locations, content, and use of spill kits, and of notification requirements associated with all spills. North Wind personnel and subcontractors shall be trained that spills of other materials, and spills greater than 5 gallons of any material, require response by the KAPL incident responders to stabilize the area. Training shall include the spill response and cleanup measures discussed in HASP-60800, *Health and Safety Plan*, and SRP-60080, *Spill Response and Reporting Plan*.

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6.1 Training Documentation

Training must be documented such that the following information is available:

- Identification of the attendee(s)
- Specific activities and topics
- Capability demonstrations (when applicable)
- Objective testing results (when applicable)
- Printed name and signature of the training provider
- Training date
- Expiration date (when applicable)

In accordance with the project scope of services, written certificates of qualification (certification) shall be prepared and maintained. North Wind will retain training and certification documents for the duration of the project when records will be turned over to DOE for archival.

6.2 Record Keeping and Reporting

North Wind will retain the following emergency response–related documentation accessible at the project site during the duration of project activities:

- Personnel emergency response training records
- Emergency response equipment inspection records
- Formal notifications, reports, and other documentation associated with this ERP.

EMCBC-NY requires reporting in accordance with DOE O 232.2A, “Occurrence Reporting and Processing of Information”; see QAP-60080-164, “Occurrence Reporting.”

7. REFERENCES

DOE-EM-002, *Emergency Preparedness Plan*

DOE O 151.1D, “Comprehensive Emergency Management System”

HASP-60080, *Health and Safety Plan*

HSP-60080-1101, “Project Hazard Analysis”

HSP-60080-1137, “Fire Protection and Prevention”

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HSP-60080-1105, “Incident Reporting and Investigation”

NFPA 1710, “Organization and Deployment of Fire Suppression Operations, EMS and Special Operations in Career Fire Departments”

QAP-60080-164, “Occurrence Reporting”

SRP-60080, *Spill Response and Reporting Plan*

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APPENDIX A – EMERGENCY ASSEMBLY AREA



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APPENDIX B – EMERGENCY CONTACTS LIST

Contact	Telephone Number	Email Address	Home Address	Office Address
KAPL Emergency Response Organization	(518) 612-5599 911 (emergency - offsite only)			
Occupational Medical Provider WellNow Urgent Care	(518) 387-3566			445 Balltown Road, Schenectady, NY 12304
KAPL Emergency Response	(518) 612-5599			
Off-Site Emergency Response (off reservation)	911			
North Wind Emergency Coordinator / Project Manager Nathan Canaris	(505) 850-4293	nathan.canaris@northwindgrp.com	345 Vallecitos Road, Jemez Springs, NM 87025	2425 River Road, SP-22, Niskayuna, NY 12309
Backup Emergency Coordinator Henry Wood	(864) 567-2979	henry.wood@northwindgrp.com	67 McCarrell Road, Travelers Rest, SC 29690	777 Lowndes Hill Road, Building 3, Suite 301, Greenville, SC 29607
Backup Emergency Coordinator Kurt Standley	(505) 215-2471	kurt.standley@northwindgrp.com	631 Aspen Grove, Jemez Springs, NM 87025	2425 River Road, SP-22, Niskayuna, NY 12309
EMCBC-NY Emergency Coordinator Martin Krentz	Office: (518) 395-4580 Cell: (716) 545-8592	martin.krentz@emcbc.doe.gov	9 Anyhow Lane, Wilton NY 12831	2425 River Road, SP-26, Niskayuna, NY 12309
Backup EMCBC-NY Emergency Coordinator Erik Pakosz	Office: (518) 612-5684 Cell: (518) 588-4692	erik.pakosz@emcbc.doe.gov	27 Westbury Court, Clifton Park, NY 12065	2425 River Road, SP-26, Niskayuna, NY 12309
ES&H Director Ray Peters	Cell: (865) 256-9812	rpeters@northwindgrp.com	931 Hamilton Ridge Lane, Knoxville, TN 37922	2800 Solway Road, Knoxville, TN 37931
Project ES&H Manager Philip Maynard	Cell: (413) 668-8027	phil.maynard@northwindgrp.com	79 Beech Street Palmer, MA 01069	2425 River Road, SP-22, Niskayuna, NY 12309
CHEMTREC (Transportation Incidents)	(800) 424-9300			
Poison Control	(800) 888-7655			

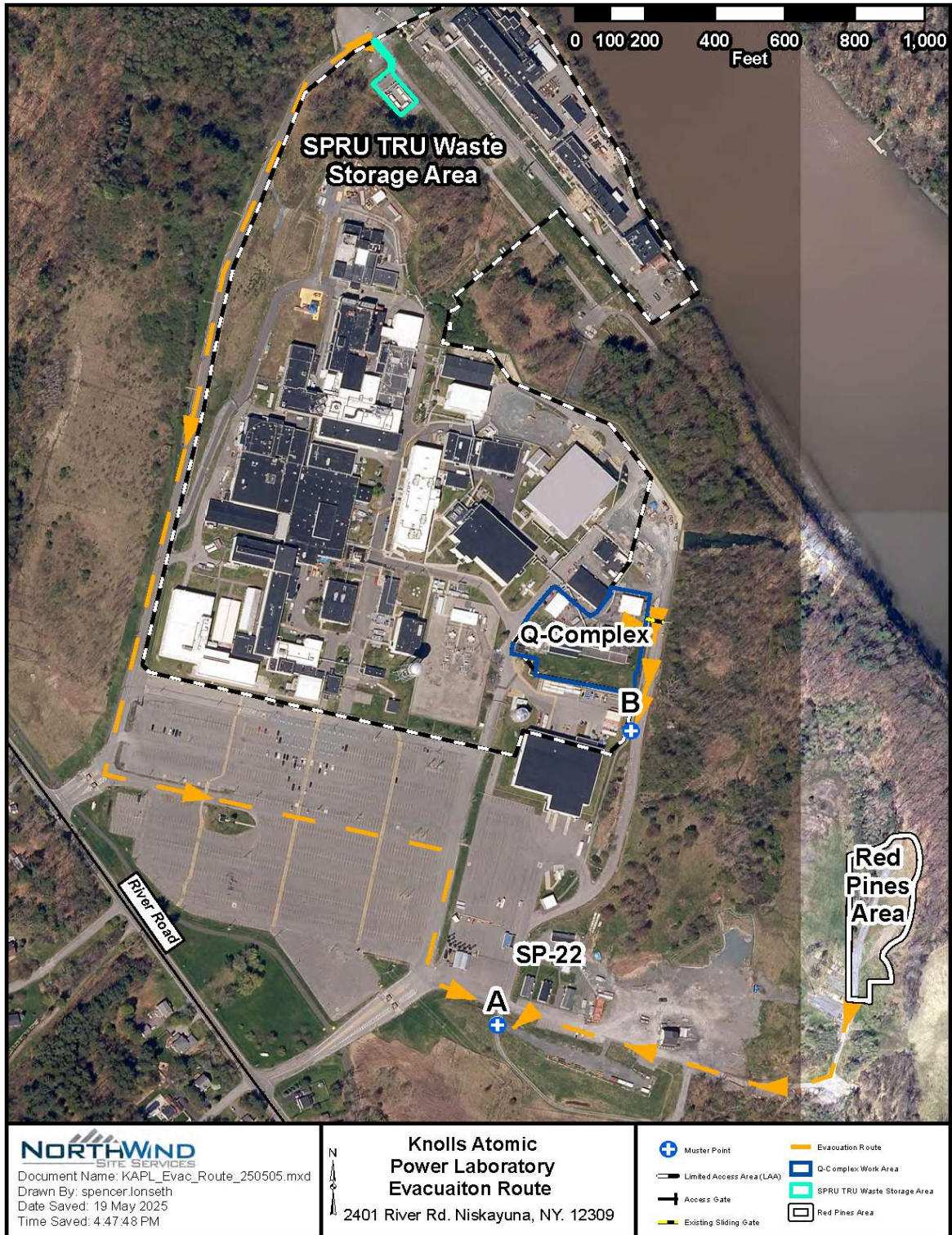
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APPENDIX C – KAPL EVACUATION ROUTE



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APPENDIX D – FIRE EXTINGUISHER LOG

Location	Serial #	Size
56K Generator (southeast corner SP-29)	MF-920572	10#
SP-22 (safety office)	G33945049	5#
SP-29 (inside south door)	F-99670058	10#
SP-29 (inside north door)	B-78412729	10#
SP-28 (inside south door)	B-13730639	10#
SP-28 (inside north door)	F-50601276	10#
SP-22 (inside north door)	B-78413387	10#
Track Loader	G43451960	5#
Ford-250	H-02726679	20#
Ford-150	H-35481788	20#
GMC-1500	H-02726680	20#
Mini-Excavator	I37119893	5#
Water Truck	I37105426	5#
Scale Area (across from SP-22)	AK-706785	10#
SPRU TRU waste area (lower-level access road)	XL-609281	10#
Roller	I24132219	5#
Loader	G08641321	5#
Dozer	I05955885	5#
Excavator	H-32611285	5#
Excavator	G-45686834	5#
Excavator	G96809100	5#
Red Pines Area	YA-526932	10#

Note: In addition to the fire extinguishers (static locations) included on this list, there are multiple fire extinguishers dispersed throughout the Q-Complex and near all smoking areas in visible and accessible locations.

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APPENDIX E – EQUIPMENT LIST

Equipment	Location	Description/Capabilities
AED	SP 22	Zoll AED +
First Aid Kit	SP 22	ANSI/ISEA Z308.1-2015, I and II Type, 25 Person
Bloodborne Pathogen/Personal Protection Kit	SP 22	29 CFR 1910.1030
First Aid Kit	Security Entrance Booth	ANSI/ISEA Z308.1-2015, I and II Type, 25 Person
Bloodborne Pathogen/Personal Protection Kit	Security Entrance Booth	29 CFR 1910.1030
First Aid Kit	Job Trailer in Q complex	3 Shelf Rapid Care First Aid Kit.
Bloodborne Pathogen/Personal Protection Kit	Job Trailer in Q complex	29 CFR 1910.1030
Spill Kit	Red Pines roll-off area	Absorbent pads, sorbent socks, sorbent pillows, nitrile gloves, goggles, disposable bags, emergency handbook
Spill Kit	Next to above Ground fuel tank	Absorbent pads, sorbent socks, sorbent pillows, nitrile gloves, goggles, disposable bags, emergency handbook
Spill Kit	Next to Frac Tank	Absorbent pads, sorbent socks, sorbent pillows, nitrile gloves, goggles, disposable bags, emergency handbook
Spill Kit	West side of Q complex next to bypass pumps	Absorbent pads, sorbent socks, sorbent pillows, nitrile gloves, goggles, disposable bags, emergency handbook
Spill Kit	East of SP 29 near generator	Absorbent pads, sorbent socks, sorbent pillows, nitrile gloves, goggles, disposable bags, emergency handbook
Spill Kit Supplies	Job Trailer	Additional Supplies - Oil and Non-Oil absorbent pads
Project Radio's	SP 22	Individually assigned
Flashlights, Caution Tape, signs, misc.	Job Trailer & SP22	
PPE	Job Trailer & SP22 Conex behind SP 29	Standard and task specific PPE
Spill Kit SK-11	SPRU TRU Conex Box	25 Absorbent Pads, 3-3"x12" sorbent pads, 18-18" pillows, nitrile gloves, plastic, 5 disposal bags, emergency handbook, 1 pair of goggles, 2 safety glasses, 1 Tub Hgx, 4 yellow Radiological disposal bags
Spill Kit SK-8	SPRU TRU Conex Box	25 Absorbent Pads, 3-3"x12" sorbent pads, 18-18" pillows

U.S. Department of Energy Environmental Management Consolidated Business Center-New York (EMCBC-NY) Quick Reference Guide – RCRA Emergency Contingency Plan

Types/Names of Hazardous Wastes Present at the EMCBC-NY Site

Hazardous wastes present at the EMCBC-NY Site include:

- Hazardous waste from ongoing demolition including certain paints, coatings, PCB-containing materials and equipment, lead, and other waste from demolition of historic buildings. Such waste may exhibit the RCRA toxicity characteristic for metals (chromium (D007), lead (D008), mercury (D009)), and organics, such as PCBs (B001-B007). This waste is stored in regulated waste accumulation areas prior to shipment for treatment and disposal. The location of waste storage areas will be variable and project specific.
- Twenty-two containers of hazardous waste stored at the Knolls Atomic Power Laboratory (KAPL) Lower Level from the 2015-2017 demolition of the former Separations Process Research Unit (SPRU) facilities consist of radiologically contaminated sump sediments, floor scrapings, piping and components. Most of the waste exhibits the RCRA toxicity characteristic for D008 (lead). Certain containers exhibit the RCRA toxicity characteristic for D007 (chromium) and D011 (silver), and one container exhibits the RCRA toxicity characteristic for D009 (elemental mercury). The waste storage area is termed TAA-003.

Hazardous Wastes Where Exposure Requires Unique or Special Treatment by Medical or Hospital Staff

The KAPL ambulance and Medical Facility are available to the EMCBC-NY Site during working hours for any radiological or non-radiological medical emergency. In addition, KAPL currently has provisions and procedures for transportation and receipt of contaminated injured workers at Ellis Hospital.

Fire Response Operations Description

The KAPL Fire Brigade provides emergency response services to the EMCBC-NY Site. The Fire Brigade is incorporated in the Emergency Services and Systems Operations (ESS) at KAPL. ESS is staffed 24 hours a day, seven days a week to provide on-scene emergency response operations. The Fire Brigade will provide emergency response as needed to address hazardous material incidents. The KAPL Fire Brigade has a memorandum of understanding with the Niskayuna Fire Department for response to KAPL in the event of an emergency. Niskayuna Fire Department automatically gets placed in standby mode once KAPL Fire Brigade is notified of a working fire.

Water for firefighting is provided by the on-site fire water main, which feeds the hydrants located at various locations throughout the site.

Estimated Amount of Hazardous Waste Present at the EMCBC-NY Site

The amount of hazardous waste from facility demolition is variable. An inventory of the Mixed Transuranic (MTRU) waste accumulated in TAA-003 is shown below. This inventory is the maximum waste inventory that will be present at TAA-003.

EMCBC-NY Waste Inventory List

Container ID	Container Type	Radiologically Contaminated with Hazard Characteristic	Response Notes	Special Notes to Hospital and Treatment Personnel
SPRU 140038	55-Gallon Drum	D007, D008, D011	For all wastes listed, minimize exposure, cover storm drains, notify Emergency Coordinator	For all wastes listed, follow EMCBC-NY procedures for medical treatment with Ellis Hospital as needed for medical emergencies and inhalation events
SPRU 140039	55-Gallon Drum	D007, D008, D011		
SPRU 140048	85-Gallon Drum	D007, D008, D011		
SPRU 140081	B-25 Box	D008		
SPRU 140087	55-Gallon Drum	D007, D008, D011		
SPRU 140088	55-Gallon Drum	D007, D008, D011		
SPRU 140131	B-25 Box	D007, D008		
SPRU 140174	85-Gallon Drum	D007, D008		
SPRU 140215	55-Gallon Drum	D007, D008		
SPRU 140219	55-Gallon Drum	D007, D008		
SPRU 140220	55-Gallon Drum	D007, D008, D011		
SPRU 140235	55-Gallon Drum in B-25 Box	D007, D008, D011		
SPRU 140236	55-Gallon Drum in B-25 Box	D007, D008, D011		
SPRU 140237	55-Gallon Drum in B-25 Box	D007, D008, D011		
SPRU 140238	55-Gallon Drum in B-25 Box	D007, D008, D011		
SPRU 140239	55-Gallon Drum in B-25 Box	D007, D008, D011		
SPRU 140241	85-Gallon Drum	D007, D008, D011		
SPRU 140260	55-Gallon Drum	D007, D008, D011		
SPRU 140270	55-Gallon Drum	D007, D008, D011		
SPRU 140271	55-Gallon Drum	D007, D008, D011		
SPRU 140273	55-Gallon Drum	D007, D008, D011		
SPRU 162146	55-Gallon Drum	D009		

Emergency Coordinator Contact Information

ERO Position	Assigned Position	Assigned Person	Office Number	Cell Number
Emergency Coordinator	Primary: DOE-EMCBC Federal Project Director	Marty Krentz	(518) 395-4580	(518) 545-8225
	Backup: DOE-EMCBC Deputy Federal Project Director	Erik Pakosz	(518) 612-5684	(518) 588-4692
Primary Emergency Coordinator Address: Krentz: 9 Anyhow Lane, Wilton, NY 12831 Backup Emergency Coordinator Address: Pakosz: 27 Westbury Court, Clifton Park, NY 12065				
DOE-EMCBC-NY Address: SP-26 2425 River Road Niskayuna, NY 12309				
KAPL Emergency Response	KAPL Emergency Response	KAPL Security – 24 Hour	518-612-5599	Not applicable
DOE Headquarters Operations Center (HQ-OC)	DOE Headquarters Operations Center (HQ-OC)	doehqeoc@oem.doe.gov	202-586-8100	Not applicable

Maps

Figure 1 provides a map of the facility showing the location of TAA-003 storage area and the route for accessing waste from TAA-003; Figure 2 provides an aerial street map view of the KAPL/DOE-EMCBC-NY Sites in relation to the surrounding area.



Figure 1. TAA-003 Waste Storage Location and Transport Route



Figure 2. KAPL/DOE-EMCBC-NY Aerial View

RECORD OF REVISION

Rev No.	Description of Changes	Affected Pages	Issue Date
0	Original Issue	All	December 2018
1	Corrected Table of Contents, Corrected New York State Watch Center name and telephone number	1, 12	01/25/19
2	Updated Plan to reflect current work scope, changed DOE designation from DOE-SPRU to DOE-NNY, corrected references to include all documents found in plan, minor edits for clarity throughout, incorporated core requirements from DOE O 151.1D, attachment 3.	All	03/03/20
3	Updated Exhibit 1	7	06/18/20
4	Updated Emergency Contact/Response Information in Table 3 and Table A-2, added a Quick Reference Guide as Appendix H.	14, 22, 38-42	08/24/20
5	Changed DOE designation from DOE-NNY to EMCBC-NY throughout, Updated Emergency Response Contact List (Table A-2 and Appendix H)	All	09/23/21
6	Updated Emergency Response Contact List (Table 3, Table A-2, and Appendix H), Updated Appendix G to include Assembly Area D and change DOE-NNY Field Office to EMCBC-NY Administrative Area	14, 22, 37, 40	01/18/22
7	Replaced in its entirety DOE-EM-002 Rev 7 Draft with North Wind Site Services ERP-60080 R7 Emergency Response Plan	1-38	07/09/25

ATTACHMENT M – PERMIT MODIFICATION LOG

**U.S. Department of Energy Environmental Management Consolidated Business Center-New York (EMCBC-NY)
Separations Process Research Unit (SPRU)**

**Resource Conservation and Recovery Act - Under Article 27, Title 9
Permit ID 4-4224-00024/00055 (DER ID# 447011)
Renewal Effective Date: 9/5/2024 Proposed Expiration Date: 9/4/2034**

The Name of the Specific Document Being Modified (Section(s) and/or Attachment(s))	Modified Page Numbers		Revision Date of Modification	Nature of the Modification(s)
	Old	New		
Attachment G - <u>Contingency Plan</u>	1 – 38	G-2 – G-21	07/09/2025	- The Emergency Response Plan serves as the RCRA Contingency Plan - Replaced in its entirety DOE-EM-002 Rev 7 Draft Emergency Preparedness Plan with North Wind Site Services ERP-60080 Revision 7 Emergency Response Plan
Attachment G - <u>Contingency Plan</u> <i>Quick Reference Guide</i>	39 – 42 39 39	G-17 – G-21 G-17 G-17 & G-18	07/09/2025	- Reformatted document from portrait to landscape and renumbered pages - Changed DOE-NNY to EMCBC-NY throughout document - Expanded description of “Types/Names of Hazardous Wastes Present at the EMCBC-NY Site” - Made general editorial, typographical corrections and clarification modifications

	40	G-19		• Updated Emergency Coordinator Contact Information: ○ Removed wording “EMCBC-NY Facility Representative” and “Radiological Program Lead” after “Backup:” ○ Removed “Dean Powell” and related information ○ Added “Erik Pakosz” and related information
	41 & 42	G-20 & G-21		• Enlarged Figure 1 and Figure 2 in Maps section to make them easier to read
<u>Attachment G - Contingency Plan</u> <i>Record of Revision</i>	43	G-22	07/09/2025	• Added Revision 7, Issue date 07/09/2025