



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

May 18, 1998

Mr. James Rasmussen
U.S. Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, WA 99352

Mr. William Adair
Fluor Daniel Hanford, Inc.
P.O. Box 1000, MSIN: H6-21
Richland, WA 99352

Richard Watkins
Pacific Northwest National Laboratories
P.O. Box 999, MSIN: P7-75
Richland, WA 99352

Dear Messrs. Rasmussen, Adair, and Watkins:

Re: Ecology Comments on Emergency Response Documents

The Washington State Department of Ecology (Ecology) has received and reviewed the following emergency response documentation:

- Hanford Emergency Response Plan (USDOE/RL-94-02)
- 616 Non-Radioactive Waste Storage Facility Building Emergency Plan
- Central Waste Complex Building Emergency Plan
- Waste Repackaging and Processing Building Emergency Plan
- 242-A Evaporator Building Emergency Plan
- Liquid Effluent Retention Facility/200 Area Effluent Treatment Facility Building Emergency Plan
- Plutonium Uranium Extraction Facility (PUREX) Storage Tunnels Supplemental Contingency Plan
- 325 Hazardous Waste Treatment Units Building Emergency Procedure
- 305-B Storage Facility Contingency Plan and Building Emergency Procedure

These documents were provided in support of the current Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit Modification Schedule (Modification D) and

Messrs. Rasmussen, Adair, and Watkins

May 18, 1998

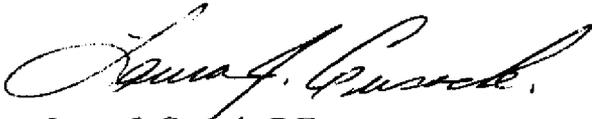
Page 2

ongoing Plutonium Reclamation Facility corrective measures. Enclosed are Ecology's comments and required actions.

The U.S. Department of Energy (USDOE) has requested temporary authorization to implement these procedures effective July 1, 1998. Satisfactory incorporation of Ecology's comments into the certified documentation will be necessary to meet the approval requirements of the Washington Administrative Code (WAC) 173-303-830(4)(e).

If you have any questions or comments, please contact me at (509) 736-3038.

Sincerely,



Laura J. Cusack, P.E.

Hanford Facility RCRA Permit Manager

LJC:ch

Enclosure

cc w/encl: Sue Price, FDH
Suzette Thompson, FDH
Harold Tilden, PNNL
Administrative Record: Site Wide Permit, Central Waste Complex (CWC),
Waste Repackaging and processing (WRAP), 616 Non-radioactive
Dangerous Waste Storage Facility, 305-B Storage Facility, 325 Treatment
Facility, PUREX Tunnels, ~~2-11-98~~, LERF/ETF

cc w/o encl: Cliff Clark, USDOE
Roger Bowman, WMH
Dan Saueressig, WMH

bcc w/ encl: Greta Davis, Ecology
Dick Heggen, Ecology
Bob Julian, Ecology
Steve Moore, Ecology
Ted Wooley, Ecology

bcc w/o encl: Steve Alexander, Ecology
Moses Jaraysi, Ecology
Steve Skurla, Ecology
Ron Skinnarland, Ecology
Jeanne Wallace, Ecology
Central Files: Site Wide Permit, Central Waste Complex (CWC),
Waste Repackaging and processing (WRAP), 616 Non-radioactive
Dangerous Waste Storage Facility, 305-B Storage Facility, 325 Treatment
Facility, PUREX Tunnels, 242A Evaporator, LERF/ETF

BUILDING EMERGENCY PLAN FOR 242-A EVAPORATOR
HNF-IP-0263-242A
COMMENTS - APRIL 21, 1998

1. Changes to DOE/RL-90-42, Hanford Facility Dangerous Permit Application, 242-A Evaporator, Chapter 7 were not made available. An "Applicability Matrix" is necessary and there are changes needed to the text.

2. The process used for this facility involves the separate document approach, HNF-IP-0263-242A and Emergency Procedures (EP). The EP's will be used for an actual emergency to direct the Building Emergency Coordinator (BED) or Incident Commander (IC) to properly handle the specific emergency. This reviewer has looked at the various EP's and has found holes in the process. The procedures do not totally cover the handling of specific emergencies. For instance, it is taken that a plane crash incident would involve a fire, but the procedure does not specify that the response is to react to a fire. It is taken for granted that the BED or IC knows what his/her reaction should be.

Ecology will accept the HNF-IP-0263-242A as acceptable, with the following comments dispositioned, to meet the requirements at this time, but will do an in-depth inspection of the individual EP's and DOE-0223, Emergency Plan Implementing Procedures at a later date, to ensure there is a continuous path to complete the actions necessary for emergencies.

3. Page 6, Section 4.0, 3rd paragraph - after the paragraph add a sentence that lists the "action levels" from DOE-0223, Emergency Plan Implementing Procedures.

BUILDING EMERGENCY PLAN FOR ETF/LERF
HNF-IP-0263-ETF
COMMENTS - APRIL 21, 1998

1. Changes to DOE/RL-97-03, Hanford Facility Dangerous Permit Application, Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility, Chapter 7 were not made available. An "Applicability Matrix" is necessary and there are changes needed to the text.

2. The process used for this facility involves the separate document approach, HNF-IP-0263-ETF and Emergency Procedures (EP). The EP's will be used for an actual emergency to direct the Building Emergency Coordinator (BED) or Incident Commander (IC) to properly handle the specific emergency. This reviewer has looked at the various EP's and has found holes in the process. The procedures do not totally cover the handling of specific emergencies. For instance, it is taken that a plane crash incident would involve a fire, but the procedure does not specify that the response is to react to a fire. It is taken for granted that the BED or IC knows what his/her reaction should be.

Ecology will accept the HNF-IP-0263-ETF as acceptable, with the following comment dispositioned, to meet the requirements at this time, but will do an in-depth inspection of the individual EP's and DOE-0223, Emergency Plan Implementing Procedures at a later date, to ensure there is a continuous path to complete the actions necessary for emergencies.

3. Page 6, Section 4.0, 3rd paragraph - after the paragraph add a sentence that lists the "action levels" from DOE-0223, Emergency Plan Implementing Procedures.

PUREX TUNNELS CONTINGENCY PLAN
PART OF DOE/RL-90-24
COMMENTS/APRIL 21, 1998

1. Page 7-1, Section 7.0, 1st paragraph - add a parenthetical reference to the "Contingency Plan HNF number".
2. Appendix 7A, Page ii, Contents and Page 7-3, Table 7-1 - Sections 4.1, 4.2, 4.3, 4.4, and 4.5 should appear in the matrix.
3. Appendix 7A, Page 4, Section 3.0, 1st paragraph - after the paragraph add a sentence that lists the "action levels" from DOE-0223, Emergency Plan Implementing Procedures.
4. Appendix 7A, Page 6, Section 3.6 - add text dealing with damaged shipments from on-site shipments.
5. Appendix 7A, Page 7, Old Section 4.2 - this section is not covered in the new document, put it back in.

Ecology Comments on Site Wide Emergency Response Documentation (DOE/RL-94-02)

1. Comment: Section 1.3.2 (page 1.8) – First two paragraphs of page 1.8 should be modified to properly reflect regulatory reporting requirements and their relationship to USDOE imposed reporting requirements for emergencies.

Suggested Correction:

- Paragraph 1 – add “immediately” to last sentence.
- Paragraph 2 – Clarify 1st sentence to reflect the USDOE imposed requirement for notification within 15 minutes of declaration of an emergency and reflect the WAC 173-303 requirement for immediate notification.

2. Comment: Section 4.2 – The section does not accurately reflect the relationship of WAC and USDOE Emergencies and does not discuss any other potential emergency classes. The section states that the emergency definitions are different and therefore require dual classification decision pathways. Subsequent sub-sections provide significant detail regarding USDOE emergency mechanisms. Limiting the discussion of emergencies to USDOE and WAC 173-303 does not reflect an integrated/comprehensive approach. Detailed preparation, assessment, and response sections for USDOE emergencies are similar to those required by WAC 173-303-340 through 360 and could be better integrated in the text.

Suggested Correction: Section should be restructured to be comprehensive of all events.

3. Comment: Sub-Section 4.2.1

- The definition of “RCRA” emergency is only excerpted but not presented as a definition.
- Second paragraph lists a very limited selection of potential information sources to be used in determining the threat posed by an event. Also does not emphasize the immediacy that assessment of an event must have (see WAC 173-360).
- Third paragraph does not emphasize that the BED/BW/IC is expected to initiate protective actions based on the event assessment. First sentence describes actions only for one hypothetical situation, if there is no “positive assessment”. What is a positive assessment?
- Forth paragraph implies the responsibility/authority of the BED/BW for classification is shared with the single point of contact and does not include Incident Commander.

Suggested Correction:

- Provide definition of RCRA emergency consistent with approach used for USDOE emergencies in subsequent sub-sections.
- Reword second paragraph to emphasize need to consider all available information when assessing events and to properly reflect the proper immediacy.
- Move last sentence of third paragraph to beginning of the paragraph. Rather than directing the BED/BW/IC to default conservatively if lacking a positive assessment, the direction should be to initiate corrective measures based on the assessment. We are all relying on the person on the scene to employ their best judgement based on their training and experience, use words to reflect that expectation.
- Responsibility and authority for assessment, classification, notification and response is not shared, reword to reflect the support role ONC and/or the environmental single point of contacts have for the BED/BW/IC.

4. Comment: Applicability Matrix – Facility/Site, Site-wide – Terms are used inconsistently in this section.

Suggested Correction: Search for these terms are ensure use consistently.

5. Comment: Applicability Matrix page A-5 last row – Authors note is unnecessary currently and may not be true in the future.

Suggested Correction: Remove authors note.

6. Comment: Section 6 – General – Notification processes between USDOE emergencies and RCRA emergencies are duplicative and appear awkward. The text generally reflects “agreements” from the PRF notification sub-team, but much of the specific notification process was unilaterally determined by Hanford organizations.

Suggested Correction: Hanford organizations should consider streamlining notification processes to eliminate unnecessary duplication and reflect a more integrated/comprehensive approach.

7. Comment: Sections 3 and 7 – General – It is not clear that the various MOU’s and agreements between USDOE and off-site entities satisfy requirements of WAC 173-303-340 (4)

Suggested Correction: Better describe the scope of MOU’s to reflect compliance with 340 (4) requirements.

**Comments on BEP for the 616 Non-Radioactive Dangerous Waste Storage Facility
(NRDWSF) Building Emergency Plan (HNF-IP-0263-616, Rev 4).**

May 6, 1998

General:

1. Comment: The requirements of WAC 173-303-360(2)(b) have not been met. See Ecology guidance document #95-402, Section G-4b.

Requirement: Describe procedures and equipment for identifying the character, exact source, amount, and areal extent of any released materials when there has been a release to the environment, a fire, or an explosion. Include a generic sampling and analysis plan outlining the basic steps which will be taken to quantify the extent of contamination.

2. Comment: Emergency action levels (EALs) are not included in the document.

Requirement: Include EALs for all emergencies.

3. Comment: The Applicability Matrix was not included.

Requirement: Provide Applicability Matrix.

Specific:

1. Comment: Section 4.0 refers to DOE/RL-94-02, Section 4.2. The BED is responsible to properly classify an event and take the appropriate actions. Section 4.2 splits that responsibility.

Requirement: See Ecology's comments on DOE/RL-94-02.

2. Comment: Attachment A does not contain a list of unit specific procedures.

Requirement: Include a list of unit specific procedures in Appendix A.

3. Comment: Section 5.2, the unit must maintain control of hazardous materials stored/used there.

Requirement: Add "The use, storage and inventory of hazardous materials is controlled. Hazardous material inventories and material safety data sheets (MSDS) are maintained (identify where in the facility they are maintained)".

4. Comment: Section 6.1.5 is titled "Hazardous Material Spill" however the text talks about dangerous waste in drums.

Requirement: Correct the text to discuss operational emergencies associated with the spill of hazardous materials.

5. Comment: Section 6.1.6 does not adequately address emergencies associated with a dangerous waste spill.

Requirement: Add text to discuss all the hazards associated with a dangerous waste spill (toxic fumes, fires or explosions, ect.).

6. Comment: Section 7.2.5, third bullet, states that “the PHMC health advocate is contacted.” It is unclear how this is done, and could cause confusion during an event.
Requirement: Identify the steps to follow to contact the PHMC health advocate.

7. Comment: Section 8.2 2nd bullet, information requested by Ecology must be included in the 15 day report.

Requirement: Section 8.2 2nd bullet, change “might” to “will”.

8. Comment: Section 9.1, the section title needs clarification.

Requirement: Add “at 616 NRDWSF” after “Equipment”.

9. Comment: Section 9.1 does not clearly identify where emergency equipment is located and could cause confusion during an event.

Requirement: Use a site plan to clearly mark where each piece of equipment is located.

10. Comment: Section 9.5, the table does not clearly specify the capability of all the equipment. For example, the capability of absorbent is to absorb spills. What size/type spill? Also, non-sparking tools are listed, but what tools, for what purpose.

Requirement: Revise table to be more specific.

11. Comment: Section 6.1.5 identifies toxic fumes as a possible hazard, however, I do not see emergency equipment listed to identify/measure/monitor these fumes. What about PPE to protect against fumes and asbestos?

Requirement: Revise tables to include all emergency equipment required to respond to all possible hazards.

Comments on Waste Receiving and Processing (WRAP) Chapter 7 (Contingency Plan) Building Emergency Plan (BEP)/Appendix 7A

May 4, 1998

GENERAL:

1. Comment: Attachment "A" is missing from the WRAP BEP submittal.
Requirement: Please provide the missing attachment so that I can proceed with the final BEP review.

2. Comment: The requirements of WAC 173-303-360(2)(b) have not been met. See Ecology guidance document #95-402, Section G-4b.
Requirement: Describe procedures and equipment for identifying the character, exact ounce, amount, and areal extent of any released materials when there has been a release to the environment, a fire, or an explosion. Include a generic sampling and analysis plan outlining the basic steps which will be taken to quantify the extent of contamination.

SPECIFIC:

1. Comment: Page 1. The first line beneath the heading states "This plan covers the following buildings and structures: 2336-W, 2620-W, 2740-W". No diagram was included as part of the BEP to identify each building and/or structure. The only diagram submitted with the WRAP BEP is Figure 1 which shows the evacuation routes for building 2336-W (although it is not labeled as building 2336-W). An accurately scaled diagram of these buildings showing their locations relative to each other and other easy to identify features in the vicinity such as roads, parking lots or other nearby structures needs to be included as part of the BEP. Evacuation routes should be indicated for the other two buildings/structures on either the above requested diagram or separate diagrams.
Requirement: Ecology Guidance Document # 95-402 states that the Contingency Plan (BEP) "must be able to stand on its own" and that a site plan must be provided.

2. Comment: Page 7, Section 1.4 The sentence stating "Boxed waste determined not to meet the disposal requirements are shipped to storage..." needs explanation.
Requirement: Describe all places that the non-conforming waste is allowed to be stored "pending treatment at other facilities".

3. Comment: Page 7, Section 3.1, second paragraph . The statement reading "The incident command post (ICP) is managed by either the senior Hanford Fire Department member present on scene or senior Hanford Patrol member present on the scene..." is not correct.
Requirement: Please modify the language in this paragraph to eliminate any confusion. Refer to DOE/RL 94-02, Section 2.2.

4. Comment: Page 8, Section 4.0, first paragraph. The last sentence reads "The incident classification process is described in DOE/RL-94-02, Section 4.2." The BED is responsible to properly classify an event and take appropriate actions. Section 4.2 splits that responsibility.

Requirement: See Ecology's comments on DOE/RL-94-02.

5. Comment: Page 8, Section 4.0, second paragraph. Delete the word "endanger" from the first sentence and replace it with "threaten".

Requirement: This is consistent with other permit language.

6. Comment: Page 8, Section 4.0, second paragraph. Attachment "A" is referenced in this paragraph, however Attachment "A" is missing from the draft BEP submittal.

Requirement: Provide the missing Attachment "A" (see general comments).

7. Comment: Page 9, Section 5.1. The statement "...(MSDS) are maintained at the facility." needs clarification.

Requirement: Describe where in the facility the MSDS information is kept and which position(s) are responsible for maintaining the MSDS information.

8. Comment: Page 9, Section 5.3. This section mentions the storage of several types of waste "...throughout WRAP." A description and/or diagram specifying the location of these areas at WRAP is missing.

Requirement: Either describe all of the "waste accumulation areas" and "container storage areas" at WRAP or provide a diagram indicating the specific location of all of these areas or provide both requested items. This information must be included in the BEP since the BEP is a stand alone document and the information could be crucial in determining a course of action during an emergency. Figure 4-1 from Chapter 4 of the WRAP permit application would be a good starting point. I previously requested that a larger version of this figure replace the original submittal since the print was too small to easily decipher. I have subsequently noticed some possible storage areas that may be missing labels. I did not see any area designated as a waste accumulation area.

9. Comment: Page 10, Section 6.1.3, second paragraph. Where is the 2620-W staging area?

Requirement: Indicate the location of the 2620-W staging area on a diagram and include specific details of compressed gas storage. Please submit this as part of the BEP submittal to Ecology.

10. Comment: Page 10, Section 6.1.3, second paragraph. Only some examples of compressed gases were included in the BEP.

Requirement: Provide a complete list of compressed gases expected to be stored at WRAP and describe how the inventory of compressed gases is maintained and where the inventory list is kept at WRAP.

11. Comment: Page 11, Section 6.1.6. The statement "Same as 6.1.5" is not adequate.

Requirement: Provide language specific to the hazard described.

12. Comment: Page 12, Section 7.0. The description "immediate area" is ambiguous.

Requirement: Describe exactly what is the immediate area for the WRAP facility.

13. Comment: Page 14. A section is missing on procedures to safely shut down the facility in the event of an emergency.

Requirement: Provide the missing language describing in detail the procedures to safely shut down the WRAP facility in the event of an emergency. Insert the new language in a section titled 7.2.1.1.

14. Comment: Page 15, Section 7.2.4, 4th Bullet. The BED will classify the event and initiate area protective actions.

Requirement: Delete the words "if required".

15. Comment: Page 15, Section 7.2.4, 4th Bullet. In the last sentence, insert the word "emergency" between "and" and "response guides".

Requirement: This more accurately describes the type of response document referenced.

16. Comment: Page 16, Section 7.2.5 3rd Bullet. The first sentence mentions that the PHMC health advocate is to be contacted during certain emergencies. Who is responsible for contacting this person?

Requirement: Add language describing who is responsible for contacting the PHMC health advocate.

17. Comment: Page 17, 2nd Bullet; Page 18, Section 7.2.5.1, first paragraph; Page 18, Section 7.2.5.2, first paragraph; Page 20, Section 7.4, first paragraph; and Page 22, Section 7.5. Same as comment 14.

Requirement: Delete the words "if required".

18. Comment: Pages 25 through 28, Sections 9.0, 9.1, 9.2, 9.3, 9.4, and 9.5. It would very useful for someone referring to this BEP to look at diagrams (to be included in this

section of the permit) in order to quickly locate the items described.

Requirement: Indicate on site diagrams the location of the items described in these sections.

19. Comment: Page 28, Section 9.6. Change the heading to read “EMERGENCY RESPONSE CENTER/INCIDENT COMMAND POST”.

Requirement: Change the heading to read “EMERGENCY RESPONSE CENTER/INCIDENT COMMAND POST”.

Ecology Comments on the Central Waste Complex (CWC), Building Emergency Document
(e.g., HNF-IP-0263-CWC) dtd. July, 1 1998

GENERAL:

Excluding building # 2401-W from the CWC permit has not yet been accomplished, either through clean closure, or by other means. Until closure has been certified (or an equivalent regulatory pathway is agreed to) by the Washington State Department of Ecology (Ecology), it is inappropriate to designate the 2401-W storage building as being non-permitted. Unless closure strategy is worked out in the near term Ecology will expect that the final version of the BEP include 2401-W.

Many sections of this BEP may be incomplete. Facility Operational Emergency sections fail to direct the individual to pertinent information regarding the potential emergency. Please see specific comments below.

SPECIFIC:

1. Comment: Section 2.0, page 6. The last part of the paragraph, describes that combining DOE/RL-94-02 and the CWC BEP will meet requirements for contingency planning as required by WAC-173-303. It is Ecology's understanding that there are several documents that are used to cover the entire gambit of emergency response on the Hanford site. Does this statement mean that as far as dangerous/mixed waste is concerned only two documents are relevant?

Requirement: Clarify this area of Section 2. Please consider all agreements made between DOE\RL and Ecology based the PRF incident. Revision of parts of the paragraph may be required.

2. Comment: Section 4.0, page 8. The top paragraph of page 8, discusses what constitutes implementation of the BEP. "An incident requiring evacuation of personnel or summoning,.....may not necessarily indicate that the plan has been implemented."

Requirement: Please give examples of where summoning emergency response units evacuating personnel would not be considered implementation of the BEP. Historically implementation has been an issue between Ecology and DOE-RI/contractors. Ecology may require that a list of examples be inserted into the final CWC BEP.

3. Comment: Section 5.3, page 8. 2401-W is missing from the list.

Requirement: Please see general comment above.

4. Comment: Section 5.3, page 9, top of page. Neither the storage modules, pads, or waste receiving area have specific numbering associated with them. Why?

Requirement: Please clarify how the individual storage modules and receiving areas are tracked in a databases such as SWITs. If there are specific numbers for identifying these storage areas please add them to the BEP.

5. Comment: Section 6.1.5, page 10. What is the maintenance plan for the catalytic recombiners?

Requirement: Specify how this equipment is maintained.

6. Comment: Section 6.1.5, page 11, 4th bullet. Last sentence discusses “worst case” assumption. What does this mean?

Requirement: Clarify what methodology (i.e., calculations, etc.) is used to predict “worst case”

7. Comment: Sections 6.1 through 6.1.7, page 9-11 and Sections 6.2 and 6.3, page 12-13. What is the purpose of these sections, other than to state the obvious? Shouldn't there be some additional text devoted directing the reader to another section of the BEP or plant operating procedures?

Requirement: Please clarify the purpose of this sections. These sections may need revision, pending outcome of discussions between Ecology and DOE-RL/contractors.

8. Comment: Section 7.2.1.1, pages 15-17. 2401-W is missing from this discussion. As previously noted in other areas of the BEP, revision may involve adding pertinent 2401-W inf. back into the BEP.

Requirement: None at this time.

9. Comment: Section 9.1 through 9.5, pages 28-29. 2401-W is missing from this discussion. As previously noted in other areas of the BEP, revision may involve adding pertinent 2401-W inf. back into the BEP.

Requirement: none at this time.

10. Comment: Attachment A, page 33. It is very difficult for Ecology to request the appropriate procedures and guides when they are not listed.

Requirement: Please revise appendix A to include a complete list of guides and procedures (which is the purpose of appendix A).

**Comments on the Draft Building Emergency Plan for the
325 HWTU's**

1. Under the introduction section, a bullet is missing that was previously included in this plan. "Minimize Property damage." Why was this taken out? Protection of property is addressed in section 3.9 of the plan.
2. Section 1.3 Facility Description – spell check should be run as (PURE) should be (PUREX) and (UO) should be (UO₃). The work "waste" is misspelled several times as (waster). The next to the last sentence has two words missing causing the sentence to be incomplete. It should read as follows: "Analytical laboratory operations are conducted on small amounts of highly radioactive materials such as samples of single-shell tank waste."
3. SINGLE-POINT-CONTACT - the word "PROCEEDING" is misspelled and should be spelled (PROCEEDING).
4. Emergency telephone numbers. In the previous BED, an 300 Area ECC Evacuation Coordinator at 376-8612. Has this position been eliminated, or is no longer necessary?
5. In the previous BED, listed in the "Area Evacuation" section, "Secure classified documents, or carry them with you." Is listed, why is it not listed here? Is there a change of circumstances, or is it not important?
6. Section 3.3 Utility Disconnects - #D. Steam

Why is there a discrepancy here from the old BED? Were the valves moved? The old document reads: "The High Pressure Steam Supply Valves is located at the northeast wall of the basement near the air receiver tank." And the new draft document reads: "The High Pressure Steam Supply Valves are located above the Power Operator's workstation entry door on the second floor East Equipment Room."

7. Section 3.7 Emergency Equipment Location #D. Crash Alarm Phone

This section has been revised changing the room that the phone was previously located in. Has this relocation actually occurred?

8. I have noticed during my review of the new draft Building Emergency Plan, that everything starting from "**Part II – Emergency Action Levels**", through the "Emergency classification of event scenarios" has not been included in this draft. Does that mean that it will not be included, or that just the portion of the plan submitted is all that is changing? Seismic and flood plain information along with the checklist provided in the previous BED is definitely needed, and I would suggest that this information continue to be supplied as it is.

305-B Building Emergency Plan Draft
comments and questions

1. In the previous document the number 811 was listed as the emergency number to be dialed. In this draft version, 911 is listed, is this accurate now?
2. Section 7.4.9 Response to Tank Spills or Leaks, needs to be bolded.
3. Section 7.5 EMERGENCY EQUIPMENT, needs to be bolded.
4. Section 7.5.1 Communication Equipment, last sentence. Insert a 3 into the 6..1.1
5. Section 7.5.3 Personal Protective Equipment, bullets need to be fixed.