

APPENDIX 5.6-C

Conceptual Spill Contingency Plan

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Conceptual Spill Contingency Plan Dewey-Burdock Project

COVER

The spill contingency plan will be organized with a cover page that includes the following:

Title: Dewey-Burdock Project Spill Contingency Plan
Original preparation date: To be determined (TBD)
Revision date: TBD
Preparer: TBD
Title of preparer: TBD

1.0 INTRODUCTION

This section will describe the purpose of the spill contingency plan, which is to describe the spill prevention, containment, response, cleanup, recordkeeping, and reporting procedures for the Dewey-Burdock Project. It will describe how the spill response and reporting procedures will depend on the type and quantity of chemical or solution released and the location of the release. It will cross reference the emergency response plan that will be prepared and made available for regulatory inspection prior to operations.

2.0 EMERGENCY CONTACTS

This section will list contact information for local, state, and federal emergency response officials. Names and telephone numbers for spill response contractors and Powertech (USA) Inc. spill response personnel also will be provided. Example emergency contacts include:

- Powertech (USA) Inc. personnel
 - Facility manager
 - Vice President of Environmental Health & Safety
 - Radiation safety officer (RSO)
 - Radiation safety technicians (RSTs)
- Local contacts
 - Emergency medical, fire and law enforcement - 911
 - Hospitals and healthcare facilities
 - County emergency management offices - Custer and Fall River Counties
- State contacts
 - DENR
 - SDGF&P
- Federal contacts
 - NRC
 - EPA
 - BLM



- USDOT
- USFWS
- USFS
- Spill and/or emergency response contractors

3.0 SITE LOCATION AND TRANSPORTATION ROUTES

This section will include a project location map and maps of the major routes for transporting chemicals to and from the site. Example transportation routes include:

- Shipment of uranium-loaded resin from the Dewey satellite facility to the Burdock CPP
- Shipment of uranium-loaded resin to and from the permit area (either to another CPP or from another satellite facility, if applicable)
- Shipment of yellowcake to a conversion facility in Metropolis, Illinois or Port Hope, Ontario, Canada
- Shipment of 11e.(2) byproduct material to a licensed disposal facility (e.g., the White Mesa site in Blanding, Utah)
- Shipment of used oil and hazardous waste to a recycling or disposal facility

This section also will describe the proximity of chemical storage areas, ponds, and pipelines to the nearest water(s) of the state as defined in ARSD 74:51 and ARSD 74:54.

4.0 APPLICABLE PERMITS AND LICENSES

This section will list all permits and licenses applicable to the spill contingency plan. For each applicable permit/license, the name, issuing agency, description, and relevant spill contingency conditions and requirements will be listed. Example permits/licenses include:

- Construction and industrial NPDES permits issued by DENR, which will include best management practices to prevent surface water contamination in the event of a spill or leak and will include reporting requirements for spills of petroleum products or hazardous chemicals
- Specific permit conditions included in the large scale mine permit issued by DENR
- Specific permit conditions included in the groundwater discharge permit issued by DENR, including the requirement to report within 24 hours any spill, leak, or accidental release which threatens a water of the state in accordance with ARSD 74:54:02:25
- NRC license conditions related to spills and leaks
- EPA Class III and V UIC permit conditions related to excursions with potential to impact nearby USDWs

5.0 MATERIAL INVENTORY

This section will include a table listing process-related chemicals, other chemicals stored or used at the site (e.g., petroleum products and small quantities of hazardous materials), and solutions



with potential for unplanned releases (e.g., process wastewater, production and restoration solutions in well field pipelines, treated wastewater in pipelines and land application areas, etc.). For each chemical or solution, the table will list the quantity and location stored or used on-site. This section also will include maps showing the locations where each chemical or solution is stored or used and the locations of spill response kits.

6.0 SPILL PREVENTION BEST MANAGEMENT PRACTICES

This section will describe the best management practices (BMPs) that will be used to prevent, monitor, and contain spills and leaks. Example BMPs include:

- Engineering controls such as secondary containment curbs, sumps, leak detection systems, pond liners, etc.
- Standard operating procedures (SOPs) for inspections, maintenance and monitoring to prevent major pond, tank or pipeline failures; SOPs for preventing transportation accidents; etc.
- Employee training requirements including training frequency and topics (i.e., procedures for spill prevention, containment, response and cleanup)
- Required spill contingency plan reviews and updates

7.0 SPILL RESPONSE AND CLEANUP PROCEDURES

This section will describe spill response procedures and personnel roles and responsibilities for each chemical or solution that may be spilled or leaked. It will describe chemical handling procedures and hazards, emergency spill response procedures, and the actions necessary to clean up affected areas once initial emergency response actions have been taken.

8.0 REPORTING AND RECORDKEEPING

This section will summarize the reporting requirements, including minimum reportable quantities and reporting timeframes, for each chemical and solution identified in the material inventory. This includes immediate notification requirements, typically within 4 to 24 hours, of any spill having the potential to affect human health or the environment, and written reporting requirements. This section also will identify documentation requirements for spills, leaks or accidental releases. Each spill report is anticipated to include:

- The date, time and location of the spill
- The type and volume of chemical or solution released
- The name, address and telephone number of the spill report preparer and the person responsible for reporting the spill (if applicable)
- The cause or suspected cause of the spill
- The total activity of each radionuclide released (if applicable)
- An explanation of the response actions taken
- An evaluation of the effectiveness of response and cleanup activities



- The immediate known impacts of the spill, including an evaluation of whether a water of the state was impacted or had the potential to be impacted
- A list of agencies notified and an evaluation of reporting criteria
- Copies of sampling results to determine the extent or severity of the spill or effectiveness of cleanup (if applicable)
- Recommendations for preventing recurrence.

9.0 MISCELLANEOUS

Additional information anticipated to be included in the spill contingency plan includes:

- Inventory of spill response equipment
- Spill reporting forms
- Employee training records
- Records of reviews and updates to the spill contingency plan