



Office of Waste Management and Radiological Protection

Contingency Plan and Emergency Procedures for Large Quantity Generators

GUIDANCE

Following is a summary and excerpts of the federal regulations regarding contingency planning and emergency procedures for Michigan's large quantity generators as required by the hazardous waste regulations. These facilities may also be subject to other regulations that require emergency planning and preparedness and are subject to other hazardous waste management requirements. For more information on those requirements and common violations found during inspections, see the Waste Management Guidance documents available on the Internet at www.deq.state.mi.us/wmd and the Michigan Manufacturers' Guide to Environmental and Safety and Health Regulations at www.deq.state.mi.us/ead/pub/caap/manufguide. The Michigan State Police, Emergency Management Division also has emergency planning guidance available at www.msp.state.mi.us. Federal requirements for large quantity generators are summarized in the US Environmental Protection Agency fact sheet at www.epa.gov/epaoswer/hazwaste/gener/lqgfact.txt.

Large quantity generators of hazardous waste are regulated under Part 111, Hazardous Waste Management, Michigan Compiled Laws (MCL) 324.11101 *et seq.* (Part 111) of Michigan's Natural Resources and Environmental Protection Act; 1994 PA 451, as amended and Subtitle C of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), and any administrative rules or regulations promulgated pursuant to these acts.

Rule 306(1)(d) promulgated under the Natural Resources and Environmental Protection Act 1994 PA 451, Chapter 3: Waste Management, Part 111 Hazardous Waste Management, requires facilities that generate over 1000 kilograms (2200 lbs.) of hazardous waste or 1 kilogram (2.2 lbs.) of acutely or severely toxic hazardous waste, in a calendar month, to write a contingency plan with emergency procedures. In addition, arrangements must be made with local emergency services.

Arrangements with Local Emergency Services

The facility must attempt to make the following arrangements, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations. Specifically, these arrangements are to familiarize local police, fire departments, and local and state emergency response teams¹ with the layout of the facility, properties of the hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility and possible evacuation routes. Where more than one police and fire department might respond to an emergency, an agreement must be reached designating the primary emergency authority(s). If you use outside contractors to respond to emergencies, arrangements must be made with emergency response contractors and emergency response suppliers. You also must make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions or releases at the facility.

Since a copy of the contingency plan must be sent to the emergency organizations, the cover letter can deal with the arrangements. Suggested language in the cover letter should explain briefly why a copy of the plan is being sent, issue an invitation to the organization to tour the facility and designate a contact person in the facility to answer questions and to outline expected emergency response. It is recommended you keep a copy of the cover letter for documentation purposes that the plan was submitted.

Contingency Plan and Emergency Procedures

The Contingency Plan and Emergency Procedures must be designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water.

The plan must list names, addresses and phone numbers (home and office) of the primary emergency coordinator and alternates. We recommend that there be at least one alternate emergency coordinator since someone has to be available to respond to emergencies at all times which includes weekends, evenings, and holidays. Having more than one alternative will minimize the burden on the primary and first alternate and allow more flexibility when you schedule who will cover non work hours. The primary and alternate emergency coordinators must have the authority to carry out the plan. If outside emergency response contractors are used this will include coordinating with them on who will be authorized to engage their services.

The plan must include a list of all emergency equipment at the facility such as fire extinguishing systems, communication or alarm systems, spill control equipment, etc., where the equipment is located, a physical description of each item and a brief outline of its capabilities. A verbal discussion of the location of the emergency equipment is not effective when there is an emergency. It is recommended that a floor plan of the facility have the locations of the fire extinguishing systems (fire extinguishers, sprinklers, hoses, fire hydrants), communication or alarm systems (alarm boxes or phones for page), and spill control equipment (adsorbents, spill kits, shovels) located on the map with easy symbols to understand. Then the written portion of the plan can have the physical description of the equipment and capabilities.

You must include an evacuation plan that describes signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes in cases where the primary route could be blocked by release of hazardous waste or fire. Again, a verbal discussion is cumbersome and not efficient in an emergency. Recommend that the primary and secondary routes be clearly marked on the floor plan described above. Then the written portion can give the signals to be used. Since one of the first questions a facility will be asked by any emergency service, if the facility had to be evacuated, is a count of persons still left in the facility and possible location.

Subsequently, it is also recommended that the evacuation routes include two outside areas where staff should assemble (using the one upwind of the facility). This way a count can be made which will be even more accurate if compared to the guest book and time cards that were also evacuated with staff.

The plan must include the emergency procedures as mandated under 265.56, which deals with emergency situations that could threaten human health or the environment. Copies of the plan must be maintained on-site and submitted to the local police department; fire department, hospital, state, and emergency response teams that may be called on to provide emergency service. This plan must be amended whenever the regulations change, the plan fails in an emergency, the facility changes, facility emergency procedure change, the emergency coordinators change or the emergency equipment changes.

¹ At the time of this update, the State of Michigan does not have a state emergency response team to respond to individual facility situations. Unless requested, contingency plans prepared by large quantity generators under these hazardous waste regulations do not need to be submitted to either the Department of Environmental Quality or to the State Police Emergency Management Division.