

C H A P T E R 5

EMERGENCY PLANNING FOR FACILITIES

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CHAPTER 5: Emergency Planning For Facilities

Emergency Planning for Facilities in Michigan

Emergency Planning for a facility is both an internal and an external function. The internal function stems from the facility's responsibility to have a plan - and potentially to have multiple plans that meet multiple state and federal regulatory requirements. The external function is met by the police, fire fighters, and Local Emergency Planning Committees. Each of these has unique planning objectives to address the protection of the facility, the community, and the responders. The facility's internal plans must "talk to" the external plans. This communication is complicated and redundant if the facility keeps multiple plans to meet the various regulatory requirements.

In 1996, the National Response Team published the Integrated Contingency Plan (ICP) Guidance to combine all of the federal plan requirements for responding to releases of oil and non-radiological hazardous substances into one plan. In 2002, the Michigan Emergency Planning and Community Right-to-Know Commission (SERC) endorsed Michigan's commitment to the ICP. Under direction from the SERC, the Michigan SARA Title III Program compiled and published matrices of the requirements in several Michigan plans, and described how they can be incorporated into the ICP.

Use of the ICP is supported by the US Environmental Protection Agency, and the US Departments of Transportation, Interior, and Labor. It is also supported by the Michigan Departments of State Police, Environmental Quality, Agriculture, and Labor and Economic Growth.

The ICP guidance and Michigan matrices are available on DEQ's Emergency Planning web site: www.michigan.gov/deqemergencyplan. The guidance provides a format in which all state and federal planning requirements relating to oil and non-radiological hazardous substances can be satisfied. It is recommended, but not mandatory that this format be used.

The National Response Team's ICP Guidance provides:

- An outline of a comprehensive ICP
- A development matrix that shows where federal plan requirements can be included in the ICP
- Regulatory cross-comparison matrices that describe the plan requirements in each regulation and identify where each requirement is addressed in the ICP

Michigan has added:

- A development matrix that shows where state plan requirements can be included in the ICP
- Regulatory cross-comparison matrices that describe the plan requirements in each regulation
- A development matrix template

While contingency plans should always be kept on site, only some need to be submitted to the regulatory agency. Refer to the Submittal Guidance for Contingency Plans in Michigan before you submit your plan to an agency in Michigan. If your plan must be submitted to a state or federal agency, you should create a regulatory cross-comparison matrix referencing the section and page number in the ICP where each plan requirement is addressed. Submit that matrix with the ICP to the requesting agency.

If you have questions regarding specific plans, refer to the Contacts for Help. The individuals listed in that document are experts with respect to the listed plan, and should also be able to help you with questions about how to incorporate the plan requirements into the ICP format.

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Contacts for Help Michigan Contingency Plan Requirements

Department of Labor and Economic Growth (DLEG)

Fire Exits	Eva Hatt, General Industry & Health Div Bureau of Safety & Regulation	hatte@michigan.gov 517-322-1831
Grain Handling	Eva Hatt, General Industry & Health Div Bureau of Safety & Regulation	hatte@michigan.gov 517-322-1831
Highly Hazardous Chemicals	Michael Mason, General Industry & Health Div Bureau of Safety & Regulation	masonm@michigan.gov 517-322-1608
HAZWOPER	Michael Mason, General Industry & Health Div Bureau of Safety & Regulation	masonm@michigan.gov 517-322-1608

Michigan Department of Agriculture (MDA)

Pesticide Control	April Hunt, Pesticide & Plant Pest Mgt Div Plant Industry Section	hunta9@michigan.gov 517-241-2979
Fertilizers	April Hunt, Pesticide & Plant Pest Mgt Div Plant Industry Section	hunta9@michigan.gov 517-241-2979

Department of Environmental Quality (DEQ)

RCRA for TSDf's	Jack Schinderle, WHMD Haz Waste Management Unit	schinderlej@michigan.gov 517-373-8410
RCRA for Generators	Jack Schinderle, WHMD Haz Waste Management Unit	schinderlej@michigan.gov 517-373-8410
PIPP	Bob Babcock, WB-LOD Security & Emerg Response Coordinator	babcockr@michigan.gov 517-373-8566
SWPPP	Mark Fife, WB-LOD, Permits Section Storm Water Program Coordinator (or WB-FOD Storm Water Program staff)	fifem@michigan.gov 517-241-8993
Drilling/Production (Oil & Gas Wells)	Ray Vugrinovich, OGS Minerals & Mapping Unit	vugrinovichr@michigan.gov 517-241-1532
Emergency Action Plan for Storage Tanks (see NFPA 30)	Jeff Tanner, WHMD Storage Tank Unit	tannerj@michigan.gov 517-335-2137

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Contacts for Help Federal Contingency Plan Requirements

US Environmental Protection Agency (EPA)

Oil Pollution Prevention SPCC	Phil Wicklein, EPA Region 5 Oil Planning & Response Sect or Shitien Yang, EPA Region 5 Oil Planning & Response Sect or Barbara Carr, EPA Region 5 Oil Planning & Response Sect	wicklein.phillip@epa.gov 312-886-0185 yang.shitien@epa.gov 312-886-0850 carr.barbara@epa.gov 312-886-7187
Oil Pollution Prevention FRP	Alexander Tzallas, EPA Region 5 Oil Planning & Response Sect	tzallas.alexander@epa.gov 312-886-0622
CAA-RMP	Silvia Palomo, EPA Region 5 OCEPP	palomo.silvia@epa.gov 312-353-2172

US Department of Transportation (DOT)

USCG-FRP	Lt. Dean Horton Marine Safety Office, Detroit	dean.e.horton@uscg.mil 313-568-9619
PHMSA-FRP	Melanie Barber, Wash D.C. Office of Pipeline Safety	melanie.barber@dot.gov 202-366-4560
Hazmat Security Plan for Shippers	Cindy Briggs, HM Specialist FMCSA – MI Division or Sgt. Susan M Fries MSP Traffic Safety Division	cindy.briggs@dot.gov 517-853-5997 (or) 517-282-3397 friess@michigan.gov 517-336-6580

Acronyms

CAA = Clean Air Act
ESSD = Environmental Science & Services Division
FMCSA = Federal Motor Carrier Safety
Administration
FRP = Facility Response Plan
HAZWOPER = Hazardous Waste Operations &
Emergency Response
HM = Hazardous Materials
MSP = Michigan State Police
NFPA 30 = National Fire Protection Association
pamphlet 30: Flammable & Combustible Liquids
Code
OCEPP = Office of Chemical Emergency
Preparedness & Prevention
OGS = Office of Geological Survey

PHMSA = Pipeline & Hazardous Materials Safety
Administration
PIPP = Pollution Incident Prevention Plan
RCRA = Resource Conservation and Recovery Act
RMP = Risk Management Plan
SPCC = Spill Prevention, Containment &
Countermeasures
SWPPP = Storm Water Pollution Prevention Plan
TSDf = Treatment Storage and Disposal Facility
USCG = United States Coast Guard
WB-FOD = Water Bureau – Field Operations
Division
WB-LOD = Water Bureau – Lansing Operations
Division
WHMD = Waste & Hazardous Materials Division

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Submittal Guidance For Contingency Plans in Michigan

Pollution Incident Prevention Plan (PIPP): Do not submit to the Michigan Department of Environmental Quality (MDEQ) unless requested. This includes the requirement in Agriculture regulations to submit the PIPP to the MDEQ – do not submit unless specifically requested to do so. The PIPP must be kept on site. You must submit a notification that the PIPP, or Integrated Contingency Plan (ICP) that includes the PIPP, was prepared along with a certification that the facility is in compliance with the Part 5 administrative rules to the MDEQ Water Bureau, Field Operations Division district office. Notifications that a PIPP has been prepared must also be sent to the Local Emergency Planning Committee (LEPC) and local health department. This is required per administrative rule R 324.2006(2) promulgated under Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. For additional information, contact the Water Bureau, Field Operations Division district office.

Spill Prevention Control and Countermeasure (SPCC) Plan: Do not submit to the MDEQ or the U.S. Environmental Protection Agency (EPA) unless requested. SPCCs are required by the EPA for oil storage facilities, and are kept on site per CFR 112.3(e)(1) & (2). For additional information, contact EPA Region 5 at 312-353-8200.

Risk Management Plan (RMP): Submit in accordance with 40 CFR 68.150 to the EPA only. The emergency response plan is a part of the emergency response program contained in the RMP and must be kept on site. Because the emergency response plan for your process must be coordinated with the community emergency response plan developed in accordance SARA Title III section 303 by the LEPC, it is recommended that you notify the LEPC when your RMP has been updated. Submit a copy of the RMP or the emergency response plan to the LEPC upon request by the LEPC. For additional information, contact EPA Region 5 at 312-353-2172.

Storm Water Pollution Prevention Plan (SWPPP): Do not submit to MDEQ unless requested. The SWPPP must be kept on site. You must submit a statement to the MDEQ Water Bureau, Field Operations Division district office certifying that a SWPPP was developed in accordance with good engineering practices. Plans must be developed as required under Part I.B of Michigan's National Pollutant Discharge Elimination System (NPDES) general permit for storm water discharges. For additional information, contact the Field Operations Division district office.

Hazardous Waste Contingency Plan & Emergency Procedures for Generators: Do not submit to the MDEQ or the Michigan State Police (MSP) unless requested. This plan must be kept on site. Administrative rule R 299.9306 promulgated under Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and 40 CFR Part 265, requires that copies of a generator contingency plan and all revisions must be “submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.” The MDEQ does not have an emergency response team, and does not provide these emergency services. While the MSP Emergency Management Division provides coordination support for local emergency responders, it does not have a state-level emergency response team. For additional information, contact the Waste and Hazardous Materials Division district office.

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Contingency plan for hazardous waste treatment storage and disposal facilities (TSDF): For submittal requirements, contact the MDEQ Waste and Hazardous Materials Division, Hazardous Waste Permits and Technical Support Unit, at 517-373-9875.

Integrated Contingency Plan (ICP): Do not submit to MDEQ unless requested or unless the ICP includes planning requirements that must be submitted. If you are submitting an ICP please indicate why the ICP is being submitted, and include a regulatory cross-comparison matrix as described in the ICP guidance.

Do not send any contingency plans to the State Emergency Response Commission (SERC). There is no requirement to submit emergency or contingency plans to the SERC. For further information, contact the Michigan SARA Title III Program at 517-373-8481 or send an email to deq-ead-sara@michigan.gov.

Certain types of facilities might have other planning requirements that are not summarized above. If you are not sure who to contact for emergency plan information, contact the Environmental Assistance Center at 800-662-9278 or send an email to deq-ead-env-asst@michigan.gov.