

GUIDANCE FOR COMMUNITY HAZMAT RESPONSE PLANS

Plans covered by this guidance:

SARA Title III

Michigan Fire Fighter Right-to-Know

MIOSHA Hazwoper for Fire Fighters



This guidance was produced by the Michigan Department of State Police, Emergency Management and Homeland Security Division in cooperation with the Department of Labor and Economic Growth, Bureau of Fire Services

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ACKNOWLEDGMENTS

This guide was developed by the Department of State Police, Emergency Management and Homeland Security Division, in consultation with local emergency management coordinators, Local Emergency Planning Committees (LEPCs), fire department representatives from around the state, and the Michigan Citizen – Community Emergency Response Coordinating Council. The Michigan Department of Labor and Economic Development, Bureau of Fire Services, assisted in reviewing the document for inclusion of Michigan Fire Fighter Right-to-Know recommendations and MIOSHA HAZWOPER requirements.

I. INTRODUCTION

This guide is arranged so that instructions and explanation of plan requirements are followed by a sample plan (Section IV). The format should be self-explanatory. When completed, the plan development worksheets can be removed, making an easily portable document for first responders.

Completing plans using this format should allow the fire department and/or the Local Emergency Planning Committee (LEPC) to meet the requirements for SARA (Superfund Amendments and Reauthorization Act) Title III, Michigan Fire Fighter Right-to-Know (FFRTK), and MIOSHA Hazardous Waste and Emergency Operations (HAZWOPER), as long as the additional requirements listed under “Fire Fighter Right-to-Know Plans” and “MIOSHA HAZWOPER Plans” identified on page 3, “Plan Requirements,” are developed, implemented and maintained. It is strongly recommended that fire departments refer to the applicable regulations for complete requirements. Making sure the plan is coordinated with and incorporated into the local jurisdiction’s EOP/EAG should also allow the plan to meet current National Incident Management System (NIMS) requirements.

SARA Title III requires LEPCs to develop site specific emergency response plans for those sites within their jurisdiction which have one or more "extremely hazardous substances" (EHS) at or above a given threshold quantity. FFRTK requires that the chief of an organized fire department prepare and disseminate to each firefighter a plan for executing the department's responsibilities with respect to each site within their jurisdiction where hazardous chemicals are used or produced. HAZWOPER requires employers (fire departments, in this case) to train all employees who may encounter or respond to a hazardous material incident. All three of these legislative requirements have planning specifications that are similar or overlap. This guidance has been developed to assist fire departments and LEPCs in completing their planning tasks. LEPCs and fire departments can greatly enhance the overall community response to terrorism by identifying chemicals, and chemical location sites in the community.

For additional compliance assistance regarding SARA Title III planning activities, contact the Michigan State Police, Emergency Management and Homeland Security Division, Local Planning Unit at (517) 336-6198. Compliance assistance regarding MIOSHA FFRTK and HAZWOPER requirements is available from the Michigan Department of Labor and Economic Growth, Bureau of Fire Services at (517) 241-8847 and the General Industry and Health Division at (517) 322-1831.

This guidance can be used to develop either industrial or farm off-site response plans. The Michigan State University - Extension Bulletin E-2575 is an additional resource for assistance in developing off-site response plans for farms.

The Emergency Management and Homeland Security Division (EMHSD) will review and comment on plans submitted by LEPCs for compliance with SARA Title III requirements only.

Local fire departments are responsible for their own FFRTK and HAZWOPER plans and are not required to submit plans to the EMHSD for review and comment. The format suggested here is optional.

Pages can be added to this document if the necessary information cannot be included in the space provided. Other documents that include information which is needed for the off-site HAZMAT response plan can be referenced, unless they need to be attached to the plan for first responder use.

II. PLAN REQUIREMENTS\RECOMMENDATIONS

The following items are required for SARA Title III plans.

1. A statement or procedure that describes how population protection decisions will be made and implemented for accidental chemical release incidents.
2. A statement or procedure that describes the community's medical response actions in the event of an accidental chemical release in the community.
3. A description of the community's HazMat response procedures and equipment and who maintains the equipment.
4. A description of the community's HazMat responders training schedule.
5. A description of the community's exercise schedule for HazMat sites and the method(s) used for exercising.
6. A list of persons/organizations to contact for assistance (e.g. railroads, DEQ/DNR offices, drain commissioners, road commissions, airports, health departments, police/sheriff, etc.).
7. A statement or procedure on how mutual aid will be activated and/or the adjoining LEPC will be contacted, should it become necessary.
8. A list of the known SARA Title III, Section 302 HazMat sites in the LEPC's geographical area of jurisdiction.
9. Identification of the facility emergency coordinator and emergency telephone number(s).
10. An inventory of extremely hazardous substances at the facility.
11. Identification of the method used to determine the population likely to be affected by a release and identify area affected (the vulnerable zone).
12. Identification of the facilities with special populations, such as hospitals, schools, and nursing homes, and identify facilities that may contribute to or are subject to, additional risks due to their proximity to the facility.
13. Identification of the provisions for evacuation routes, including alternate routes out of the vulnerable zone if evacuation becomes necessary.
14. Identification of the routes over which extremely hazardous substances are transported.
15. Description of the facility's procedures to be followed once a release has been detected.
16. Identification of the hazardous materials expertise and emergency response equipment of the facility, and identifies how the equipment is maintained.
17. Procedures for a timely notification of a release by the owner/operator to the local emergency

management coordinator and government agencies.

Michigan Fire Fighter Right-To-Know Plan Recommendations:

1. A description of the fire department's HazMat training schedule.
2. A list of persons/organizations to contact for assistance in response.

Note: If the above information is included in the site plan by or in conjunction with the LEPC, then these planning recommendations are met under SARA Title III requirements.

MIOSHA HAZWOPER Plan Requirements:

1. A statement or policy on lines of authority at the fire department and/or the use of the incident command system.
2. A statement or policy on decontamination procedures.
3. A policy or description of emergency medical and first aid treatment for responders.
4. A procedure for response critique and follow-up.
5. A procedure for personal protective equipment (PPE) use during HazMat incidents.

Other items:

The following items **are not** required but would make a plan stronger and more complete and are strongly recommended for Fighter Right-To-Know Plans.

1. Inventory of other chemicals of concern.
2. Facility location map.
3. Site layout map indicating chemical location.
4. Access control procedures and maps of access control points and traffic rerouting within the vulnerable zone.
5. Contact names and phone numbers for populations of concern, e.g. shopping centers, factories, schools, etc.
6. A list of shelters in the event an evacuation is needed.
7. Identification of where chemical specific toxicological information can be found.

NIMS Compliancy

FEMA's National Integration Center/ Incident Management Systems Division (NIC/IMSD) requires that all LEPC emergency response plans be NIMS compliant. These requirements can be viewed and downloaded at http://www.fema.gov/pdf/emergency/nims/eop-sop_local_online.pdf . Because LEPC off-site response plans are considered to be part of the county or city Emergency Operations Plan

(EOP)/Emergency Action Guidelines (EAG), the applicable requirements should be met. However, it is important that the LEPC make sure that any of its plans are formally incorporated into any applicable EOP/EAGs so that they officially become part of them. It is also important that the LEPC coordinate with the local Emergency Management Coordinator(s) to verify that the local EOP/EAG meets NIMS requirements in order for the LEPC plan to also be considered NIMS compliant.

III. PLAN DEVELOPMENT INSTRUCTIONS

A. SIGNATURE PAGE (Page 6)

It is recommended that the Emergency Management Coordinator and the LEPC Chairperson of the jurisdiction within which the site falls sign this page. It is also recommended that the fire chief of the jurisdiction sign the page if the plan is to be used for FFRTK and/or HAZWOPER purposes. Signatures of all three officials indicate support for development of a safe community.

B. SITE ADDRESS AND OWNER/OPERATOR INFORMATION (Page 7)

Identify the site name, address, nearest crossroads, and the emergency contacts for the site.

C. CHEMICALS ON SITE (EHS and Non-EHS) (Page 7)

The plan must include a list of Extremely Hazardous Substances (EHSs) at each site. An EHS is a chemical that has been identified by the Environmental Protection Agency (EPA) as very dangerous to life and health. Site records indicate exact quantities of chemicals.

Farm chemicals, however, are often identified only by product name and it may be difficult to tell if they include an Extremely Hazardous Substance (EHS). Those that do, usually have only a certain percent of an EHS in them. See Section V, "Planning Resources", for information on commonly used farm chemicals. In addition, the LEPC, Michigan State University Extension, the Michigan State Police Emergency Management and Homeland Security Division (Local Planning Unit), and the Department of Agriculture can be helpful in identifying the make-up of agricultural chemical products.

List what is stored or used at the site during the course of the year. Include all EHS chemicals as well as other chemicals of concern.

Material Safety Data Sheets (MSDS) or other similar chemical information sources can provide specific information on the data items requested in this section. For example, primary hazard information (how the chemical affects people and how it can get into a person's system) and response precautions (what responders must watch out for and how they can protect themselves) are usually found in MSDSs.

Non-EHS chemicals are not required for SARA Title III plans, but are recommended for Fire Fighter Right-to-Know plans. However, including them in all plans can be very helpful if accidental chemical mixing, during an incident or otherwise, is a possibility.

D. VULNERABLE ZONE (Page 8)

The method for determining the vulnerable zone and the vulnerable zone itself is required to be specified in the plan. For planning purposes, a vulnerable zone can be calculated and identified on a map. It is recommended that both a most likely case and a worst case vulnerable zone be calculated. This will allow responders to be aware of the largest area that could be affected by a release at the site. Several methods for calculation are available, including CAMEO (Computer Aided Management Operations of Emergency Operations), the **North American Emergency Response Guidebook**, **North American Emergency Response Guidebook**, or the manual method suggested in EPA's **Technical Guidance for Hazards Analysis**. The vulnerable zone could be placed on a map which could show other information as well, such as the location of the facility, primary and secondary evacuation routes, special populations, etc.

E. SITE MAP (Page 8)

The site map is recommended for Michigan FFRTK plans. The map should show all building locations and other structures, driveways, geographical and environmental features (wells, ponds, drainage ditches, ground slope, streams, etc.), gates, fences, hydrants, standpipes, or any other items which may be useful landmarks during a response. Building entrances and exits, as well as the building evacuation plan, should also be included. Chemical storage locations should be shown on this map for FFRTK purposes. If an immediately adjacent site or facility poses an additional threat, note that site's location on this map as well. For large sites, it may be necessary to have a map for each section of the site. Add pages, if needed.

F. AFFECTED FACILITIES (Page 8)

After the vulnerable zone has been determined, identify facilities and populations that would be affected. If this information is not needed (e.g. in the event of a spill that would not go off-site and would not threaten the surrounding population or sensitive areas), write the reason in the appropriate blanks. Information should be provided on nearby special or vulnerable populations (e.g., day care homes, group homes, hospitals, nursing homes, etc.) and on facilities that may contribute risk (e.g., other facilities whose chemicals, if mixed with a release from this site, could cause a greater problem).

G. SITE RESOURCES AND PROCEDURES (Page 8)

Resources and response procedures available at the site should be indicated in the plan. These items can include: facility resources for responding to a spill, routes used to transport EHSs to and from the site, release detection procedures at the site, and response procedures that site personnel will use in the event of an accidental release (e.g. "call 911" or "follow company chemical spill Standard Operating Procedures (SOP's)").

H. TRANSPORTATION ROUTES (Page 9)

SARA Title III requires that transportation routes used to transport extremely hazardous substances be identified in the plan or referenced to where they can be found. In addition, primary and alternate evacuation routes need to be identified. This information can be included on a map.

I. RESOURCES AND PROCEDURES (Page 9)

Information about fire department response procedures (what responders are qualified to do) and how security will be maintained around the site in the event of an accidental release must be included in the plan. **Note:** If this information is located in the Emergency Operations Plan (EOP)/Emergency Action Guidelines (EAG), or located at the fire department, reference must be made in this section as to where the information can be found.

J. NOTIFICATION (Page 9)

If an accidental chemical release occurs, certain agencies must be notified. It should be noted that cellular 911 calls might not always go to the correct dispatch center if the caller is near a political boundary or large body of water which allows calls to be more easily transmitted great distances. Therefore, a regular phone emergency contact number may also be needed in the plan. Follow up written notification by the facility to the appropriate authorities is also required. The content of these reports is specified by SARA Title III, and state and local regulations.

(SAMPLE FORMAT)

B. SITE ADDRESS AND OWNER/OPERATOR INFORMATION

Site Name: _____

Site Address: _____

Nearest Crossroads: _____

Facility Emergency Coordinator: _____ 24 Hr. Phone: _____

Emergency Contact Name: _____ 24 Hr. Phone: _____

(If different from above)

Alternate Contact: _____ 24 Hr. Phone: _____

Owner Name: _____ 24 Hr. Phone: _____

Owner Address: _____

C. EHS CHEMICALS ON SITE (ADD PAGES, IF NECESSARY)

Product Name: _____

EHS Chemical Name: _____

CAS #: _____

Storage Method: _____

Average Amount on Site: _____

Maximum Amount on Site: _____

Months (By Name) Maximum Amount is on Site: _____

Initial Evacuation Zone: _____

Chemical/Response Information Location: _____

Primary Hazard to Response Personnel: _____

Response Precautions/Suggested PPE: _____

Product Name: _____

EHS Chemical Name: _____

CAS #: _____

Storage Method: _____

Average Amount on Site: _____

Maximum Amount on Site: _____

Months (By Name) Maximum Amount is on Site: _____

Initial Evacuation Zone: _____

Chemical/Response Information Location: _____

Primary Hazard to Response Personnel: _____

Response Precautions/Suggested PPE: _____

OTHER CHEMICALS OF CONCERN (NON-EHS):

D. DESCRIBE METHOD USED TO DETERMINE VULNERABLE ZONE:

VULNERABLE ZONE MAP:

(This map can also be used to identify transportation, primary evacuation/alternate evacuation routes, special populations, etc. Please label map.)

Reference attached facilities location map.

E. SITE MAP:

(Fire Fighter Right-to-Know Requirement)

F. AFFECTED FACILITIES:

Nearby Facilities With Special Populations:

NOTE: Must be listed here or referenced where it can be found. (If none, put NA)

Nearby Facilities That May Contribute Risk:

G. SITE RESOURCES AND PROCEDURES:

NOTE: Information requested in this section must be provided in this plan. If the information is found elsewhere, a description of where the information is located must be included in this section. (Do not leave blank spaces.)

This site has the following equipment and trained personnel available to contain a release:

Site response equipment maintained by: Site owner Other (specify): _____

Chemical Information Location: _____

Site Response Procedures _____

H. ROUTES NORMALLY USED TO TRANSPORT EHSs: _____

I. COMMUNITY RESOURCES AND PROCEDURES:

Fire Department Response Procedures for this Site: _____

Site Security Control Procedures: _____

J. NOTIFICATION:

Facility personnel must call these numbers:

Fire Department: _____ Local Emerg. Mgt. Coord.: _____

State Emergency Response Comm./MDEQ : 1-800-292-4706 (Pollution Emergency Alerting System-PEAS hotline)

Department of Agriculture (farm related spills): 1-800-405-0101

National Response Center: 1-800-424-8802

Fire Dept. personnel must call this number (per Act 207, P.A. of 1941, as amended, and per Executive Order 2003-18, as of December 1, 2003, the Bureau of Construction Codes and Fire Safety will receive reporting and notification of any Hazardous Material incidents as stated in the Michigan Fire Prevention Code:

24-hour pager number: 1-888-237-4081

24-hour voice mail notification number: 1-517-322-5316

V. PLANNING RESOURCES

The following reference materials are available to assist in the development of Hazmat plans. They can be obtained from the EMHSD's Planning Section by calling 1-517-336-6198.

1. Emergency Planning for the Farm, Michigan State University - Extension (Extension Bulletin E-2575, available from Extension offices for a nominal fee) includes Threshold Planning Quantities (TPQ) for Commonly Used Chemicals in Farming Applications
2. Vulnerability Analysis Worksheet
3. List of Lists, a consolidated list of chemicals subject to the Emergency Planning and Community Right-to-Know Act (EPCRA) and Section 112(r) Clean Air Act, as amended. Also available at www.epa.gov/ceppo/ehs/ehsalpha.html
4. Site Emergency Planning Workbook (all hazards), EMHSD Pub. 602 available at http://www.michigan.gov/msp/0,1607,7-123-1593_3507-14743--,00.html
5. SARA Title III Emergency Response Plan Submittal Sheet
6. www.epa.gov/swerceppo provides information on how to order CAMEO, ALOHA, and LANDVIEW and also provides information on Extremely Hazardous Substances (EHSs), and access to chemical profiles and health information regarding EHSs
7. www.deq-ead-sara@michigan.gov provides information regarding SARA Title III reporting requirements and reports
8. www.mspEMHSD.michigan.gov provides SARA Title III Local Emergency Planning Committee (LEPC) related information, workbooks, information sheet, SERC information, etc.

NOTE: Staff from the Michigan State Police, Emergency Management and Homeland Security Division, Local Planning Unit, is also available to answer questions and offer assistance to LEPCs. They can be contacted at 1-517-336-6198. Questions can also be faxed to staff at 1-517-333-4987.