Contingency Plans

ENVIRONMENTAL QUALITY
WASTE MANAGEMENT & RADIATION CONTROL
* SQG – no contingency plan requirement in the regulations, but good info to have!

* LQG – requirements laid out in R315-262-260 through R315-262-263
The contingency plan shall be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.
What does it need to include?
(R315-262-261)

* The actions facility personnel will take
  * See R315-262-265

* Arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or, if applicable, the Local Emergency Planning Committee
What does it need to include?

* Names and emergency telephone numbers of all emergency coordinators and this list shall be kept up to date.
  * List multiple coordinators as primary, secondary, etc.
  * May list the staffed position as well as an emergency telephone number that can be guaranteed to be answered at all times.

* List of all emergency equipment at the facility (fire extinguishing systems, spill control equipment, communications and alarm systems, internal and external, and decontamination equipment)
  * Include the location and a physical description of each item on the list, and a brief outline of its capabilities.
What does it need to include?

* Evacuations plans

* If the generator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with some other emergency or contingency plan, it need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the standards of Rule R315-262.
Emergency Procedures
(R315-262-265)

Emergency coordinator must:
* Activate alarm
* Identify character, source, amount, and area of release and determine the extent to which it threatens human health and the environment
* Notify appropriate authorities
* Take reasonable measures to ensure emergency does not spread
* Provide for storing, treating, or disposing of generated waste
* Follow incident reporting requirements
**What do I do with it?**

(R315-262-262)

* Maintain an up-to-date copy at the facility
* Submit a copy of the contingency plan and all revisions to all local emergency responders
  * (i.e., police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services).
The contingency plan shall be reviewed, and immediately amended, if necessary, whenever:

* Applicable regulations are revised
* The plan fails in an emergency
* The generator facility changes--in its design, construction, operation, maintenance, or other circumstances--in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency
* The list of emergency coordinators changes
* The list of emergency equipment changes
If you became an LQG after May 30, 2017 or have update or amended your contingency plan since May 30, 2017 you must have a quick reference guide!

QRG is intended to provide first responders with the most relevant information in a format that is easily navigable, to allow for a more effective response to an incident at a facility.
Quick Reference Guide (QRG)

Must include 8 specific items laid out in R315-262-262(b):

1. The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time, e.g., toxic paint wastes, spent ignitable solvent, corrosive acid;

2. The estimated maximum amount of each hazardous waste that may be present at any one time;

3. The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff;

4. A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes;
Quick Reference Guide (QRG)

Must include 8 specific items laid out in R315-262-262(b):

5. A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers;

6. The locations of water supply, e.g., fire hydrant and its flow rate;

7. The identification of on-site notification systems, e.g., a fire alarm that rings off site, smoke alarms; and

8. The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.
Quick Reference Guide (QRG)

* Must be standalone – don’t want it referencing other documents or sections of the contingency plan
* Must be submitted to local emergency responders or local emergency planning committee – resubmit whenever it is updated
* Keep it updated!
Common violations

* Emergency contacts not up-to-date
* Plan does include specific actions personnel will take in response to incidents
* Plan does not include reporting requirements
* No QRG
* QRG missing one or more necessary elements
* No evidence that plan had been provided to local emergency contacts
Questions?

Email questions to gmarinick@utah.gov