

# Hazardous Waste and Liquid Industrial By-products Contingency Planning

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# Goals

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- Define Contingency Plan
- Identify Contingency Plan Contents for Hazardous Waste
- Identify Contingency Plan Coordination
- Identify Common Contingency Plan Implementation Errors

# What is a Contingency Plan

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Comprehensive emergency response plan required of large quantity hazardous waste generators and treatment, storage, and disposal facilities (TSDFs)

Contingency plans address all threats associated with hazardous waste activities and procedures to address emergency situation

# What is a Contingency Plan

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Contingency plans must include

- Emergency coordinators
- Floor plan map
- Emergency equipment
- Off-site risks
- Evacuation plans
- Assessment of off-site risks
- Clean-up and decontamination procedures
- Details about resuming operations

# Contingency Plan Contents

## Emergency Coordinator

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Emergency coordinator's name, address, and phone number (home and office) must be included in the plan

Emergency coordinator must be available to respond to emergencies at all times, including weekends, evenings, and holidays

At least one alternate emergency coordinator should be identified so that there is someone to respond at all times

# Contingency Plan Contents

## Emergency Coordinator

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All emergency coordinators must have the authority to carry out contingency plan

If outside emergency response contractors are used, the plan must include the emergency response contractor name, location, contact and identification of who can authorize contractor services

# Contingency Plan Contents

## Floor Plan Map

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Floor plan of the facility must identify:

- location of all emergency equipment (fire, spill, and alarm system)
- all evacuation routes (primary and secondary).

# Contingency Plan Contents

## Emergency Equipment

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Emergency equipment includes:

- fire extinguishing systems
- communication or alarm systems
- spill control equipment, etc.



# Contingency Plan Contents

## Emergency Equipment

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The contingency plan must include:

- list of emergency equipment
- physical description of the emergency equipment
- details of where the equipment is located
- brief outline of the equipment capabilities
- equipment inspection and maintenance schedule

# Contingency Plan Contents

## Evacuation Plan

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The contingency plan must include:

- primary and secondary evacuation routes
- how the evacuation will be announced
- details on how employees will ensure all employees and guests are evacuated during an emergency
- two outside areas where employees/guests are to assemble during an evacuation (so an upwind location can be selected)

# Contingency Plan

## LEPC Coordination

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Large quantity generators of hazardous waste must:

- share their contingency plans with local emergency response officials (police, fire, hospitals, and emergency response teams)
- should include cover letter can be used to explain why the information is being provided, inviting responders to tour the facility and a point of contact
- should include a quick reference guide to meet future rulemaking

# Contingency Plan Requirements

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Large quantity generators must maintain contingency plan that is complete and **CURRENT** on-site at all times

TSDFs have to follow their operating license and the Part 111 rules for keeping their contingency plan current (minor mods, etc.)

# Release Requirements

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If a release (fire, explosion or discharge) that could threaten the public health, safety, welfare, or the environment, or reaches water:

- Take immediate action to protect the public health, safety, and welfare, environment, and stop the release
- Notify local responders
- Notify the pollution emergency alerting system using the telephone number 800-292-4706

# Release Requirements

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If a release occurs (fire, explosion or discharge) that could threaten the public health, safety, welfare, or the environment, or reaches water, the large quantity generator or TSD owner/operator must:

- Note in the operating record the time, date, and details of any incident that requires implementing the contingency plan
- Submit report to the DEQ Director within 15 days of the release that includes the information specified in 40 CFR Part 265.56

# Release Requirements

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Within 15 days of a release requiring implementation of the contingency plan, the owner/operator must submit a written report to the DEQ Director documenting:

- Name and telephone number of the owner/operator Name, address, and telephone number of the facility
- Date, time, and type of incident
- Name and quantity of material released

# Release Requirements

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Within 15 days of a release requiring implementation of the contingency plan, the owner/operator must submit a written report to the DEQ Director documenting (continued):

- Name and quantity of material released
- Extent of injuries, if any
- Assessment of actual or potential hazards to human health or the environment
- Estimated quantity and disposition of recovered materials that resulted from the incident
- Any additional information specified in the treatment, storage, disposal facility license



# Release Requirements

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To understand all of the release requirements that may apply under the various state and federal environmental statutes and rules, see the Michigan Release Notification Table at [www.michigan.gov/chemrelease](http://www.michigan.gov/chemrelease)

# When Things Go Wrong

## Implementation

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**Q:** So when would a company have to implement their contingency plan?

**A:** When there is a fire, release, or explosion that could harm human health and environment or the release reaches waters of the state

# When Things Go Wrong Implementation



# When Things Go Wrong

## Implementation



# When Things Go Wrong

## Implementation



# When Things Go Wrong Implementation



# When Things Go Wrong Implementation



# When Things Go Wrong

## Implementation





# Afterwards: Assessing Off-Site Risk

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After a fire or explosion or significant release:

- Screening: Is off-site corrective action needed?
- Use Risk-Based cleanup numbers of Part 201 to assess initial risk.
- Conduct further investigation and mitigation or remedy, as required.

# Afterwards: Cleanup and Decon

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Inspect, clean, and replace emergency equipment as needed.

- Is Large/Motorized equipment visibly clean of any residue?
- Have any hand tools or other small equipment been rinsed/washed with a suitable cleanser?
- Has PPE been restocked, refilled, or if reusable, washed and sanitized?
- Has monitoring equipment been cleaned and repaired or replaced?
- Were contractors on-site and followed up with, or debriefed?

# Afterwards: Resuming Operations

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If the plant was evacuated or shut down, prior to resuming operations:

- Ensure proper cleanup procedures have been implemented.
- Has all emergency equipment been cleaned?
- Is all emergency equipment fit for use or reuse?
- If licensed, has the affected area(s) been re-certified for capability to operate?

# Contingency Plan

## Common Violations

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### Emergency Coordinator information:

- Needs to have the phone number (office and home) and HOME ADDRESS as part of the plan
- A cell number where the emergency coordinator can be reached at any hour is acceptable.

*Remember, these regulations were written BEFORE cell phones, so the only way to contact an emergency coordinator after hours was at home.*

# Contingency Plan

## Common Violations

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### Evacuation Routes:

- Need both a primary and an alternate or secondary route
- Many plans have a primary route but do not include an alternate route

# Contingency Plan

## Common Violations

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### Emergency Equipment: Description and Capabilities

- Many plans do not have adequate descriptions and capabilities of the equipment, often just stating “1 shovel, 3 fire extinguishers, etc.”
- In the above example, is the shovel intended only for non-flammable materials? Is it spark proof?
- In the above example, what class of fire extinguishers are on site?

# Contingency Plan

## Common Violations

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### Emergency Equipment: Description and Capabilities:

If the plan lists absorbents or neutralizers, for example, what is the absorbent or neutralizer intended for?

- Many absorbents are specialized for certain materials, such as oils, petroleum products, etc.
- Using the wrong absorbent for a spill, at best, is a waste of money and accomplishes very little.
- Putting the wrong neutralizer on a spill can be dangerous!

# Contingency Plan

## Common Violations

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### Emergency Response Coordination with Local Officials

- Must document that the contingency plan was shared with local response agencies
- Easiest method of documentation is certified mail receipt
- The contingency plan must be shared with local agencies whenever there is an update



# Contingency Plan

## Common Violations

SQG - Not having the required emergency posting information by a phone

**HAZARDOUS WASTE EMERGENCY INFORMATION**

EMERGENCY COORDINATOR	NAME _____ PHONE _____	Map of facility with emergency equipment, spill equipment, exit routes, and alarm locations.
ALTERNATE	NAME _____ PHONE _____	
FIRE DEPT.	PHONE _____	
HOSPITAL	PHONE _____	
POLICE	PHONE _____	
Fire alarm is located: _____ _____		
Spill control equipment is located: _____ _____		
Fire extinguishers are located: _____ _____		

National Response Center: 1-800-424-8802  
Michigan Pollution Emergency: 1-800-292-4706

Other hazardous waste requirements may apply.

Provided by: The Environmental Assistance Division and the Waste Management Division of the Michigan Department of Environmental Quality  
Environmental Assistance Center 1-800-662-9278

DEQ  
EPA 3472

# Contingency Plan

## Common Violations

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### SQG

- Training may be INFORMAL but it is still required
- Failure to identify an emergency coordinator
- If an emergency coordinator is identified, failing to make sure they are available to get to the site within a reasonable period of time (e.g. an out of state corporate person is not a good idea for an emergency coordinator)

# Contingency Plan

## Common Violations

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### Large Quantity Generators:

- Written hazardous waste training program
- Annual training
- Must have description of the *type of training given*
- Job title, job descriptions

# Questions?