CONTINGENCY PLANS

- What are they
A PLAN THAT DESCRIBES:

- **What** emergency procedures to be taken in case of an emergency
- **Who** will carry out the procedures.
- **How, Where, & When** the plan will be implemented

And
EVERY CONTINGENCY PLAN MUST ANSWER:

WHO

WHAT

WHERE

WHEN & HOW
Above all:

A contingency plan must be FLEXIBLE and ADAPTABLE to changing conditions.
CONTINGENCY PLANS

- Why Do You Need Them
BECAUSE!

- Required under 40 CFR 262.34(a) Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that (as per 262.34 et. al.)

- MORE IMPORTANTLY
To plan for response to fire explosion, or release

- In other words:
  - To prevent harm to ............
  - To save your ASSETS
CONTENGENCY PLANS

WHO Needs Them?
- Treatment, Storage & Disposal facilities
- Transporters
- Large Quantity Generators (LQG)
- Small Quantity Generators (SQG)
- Conditionally Small Quantity Generators (CESQG)
CONTINGENCY PLANS

- The requirements are different for Large Quantity, Small Quantity, and Conditionally Exempt Small Quantity Generators.
The generator must immediately notify the National response center 800-424-8802 with the following:

- Name, Address, & EPA Identification Number
- Date, Time, & Type of incident
- Quantity & type of Hazardous Waste
- Extend of injuries
- Estimate quantity & disposition of recovered material
LQG REQUIREMENTS:

- Required under 40 CFR 262.34(a) Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that (as per 262.34(a)(4):

  - “the generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR part 265, 265.16, and with 40 CFR 268.7(a)(5).”
LQG CONTINGENCY PLANS

40 CFR 265 Subpart D = emergency planning:

Contingency plan for response to fire explosion, or release

- Describes actions to be taken in the event of an emergency
- Copies maintained at facility and with local emergency responders
- Must be kept up-to-date
LQG CONTINGENCY PLANS

- Emergency procedures
  - Activate internal facility alarms
  - Notify state & local agencies
  - Identify character, source, & extent
  - Assess hazards to human health & environment
  - If threat extends off site: notify officials
  - Take measures necessary to prevent spread
  - If operations shut down monitor for problems
  - Remedi ate & properly dispose of contamination
  - Ensure facility & equipment is returned to normal
  - File all required reports
LQG CONTINGENCY PLANS

- On-site Emergency Coordinator
  - At Least One
  - On site or
  - On call & available to respond within a short period of time. phone # & address
Generator must ensure that all employees are thoroughly familiar with proper waste handling & emergency procedures relevant to their responsibilities during normal facility operations and emergencies.
LARGE & SMALL QUANTITY GENERATORS

40 CFR 265 Subpart C

Preparedness & Prevention

Maintenance & operation of facility

Required Emergency Equipment

Testing & Maintenance of Equipment

Access to communication or Alarm

Required Isle Space 18/30=2/3

Arrangement with Local Authorities
Emergency coordinator must respond to any emergencies that arise

- Fire: Call Fire Department & attempt to extinguish it using fire extinguisher
- Spill: Contain Flow to extent possible, clean up & dispose of contaminated material
- If the event threatens human health outside the facility or reaches surface water...
LARGE & SMALL QUANTITY
GENERATORS

- Notify the appropriate authorities including:
  National response center (NRC)
  800-424-8802

If the reportable quantity (RQ) is met

When in doubt, call!
LARGE & SMALL QUANTITY GENERATORS

40 CFR 268.7(a)(5)

- Remediated Contaminated Debris Must Be Handled To Meet LDR Requirements.
  - Analyzed & Gather All Information needed To Treat The Waste According To LDR Standards.
  - LDR Notification (Land Band)
SQG REQUIREMENTS

- 40 CFR 262.34(d)(5)

- At least one person must be available at all times to act as an Emergency Coordinator.
  - On site or
  - On call & available to respond within a short period of time. phone # & address
SQG REQUIREMENTS

The generator must post the following information next to the telephone:

- Name & telephone number of emergency coordinator
- Location of fire extinguishers, spill control equipment, fire alarm, & phone number of local Fire Department
REGULATIVELY

NONE

SPECIFICALLY FOR CONTINGENCY PLANS
HOWEVER!

There are violations for discharges & improper disposal which could be cited and carry heavy penalties.
AND,

Even CESQGs have assets that need to be saved.
SO
USE
COMMON
SENSE
CESQG REQUIREMENTS

- COMMON SENSE SHOULD TELL YOU THAT:

CESQGs NEED A PLAN TOO!
WHO, WHAT, WHERE, WHEN & HOW

Know Who to call & Who will do What, Where, When & How
Remember, it’s your life, property & $ you are trying to keep safe!
HAVE A PLAN!

Even if it is not specifically required.