

CONTINGENCY PLANS

- What are they

A PLAN THAT DESCRIBES:

- **What** emergency procedures to be taken incase of an emergency
- **Who** will carry out the procedures.

And

- **How, Where, & When** the plan will be implemented

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**

CONTINGENCY 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

APPLIES TO ALL 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
 - Extent 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
 - Remediate & 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**

LARGE & SMALL QUANTITY GENERATORS

40 CFR 265.16

Personnel Training

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

LARGE & SMALL QUANTITY GENERATORS

- 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

CESQG REQUIREMENTS



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.