



Minnesota
Pollution
Control
Agency

Step 8: Plan for Emergencies

Emergency planning for small quantity generators

Waste/Hazardous Waste #1.08b • December 2009

Environmental concerns

No business ever intends to release hazardous waste, but unexpected events do occur. For this reason, it is important to plan and prepare for hazardous waste-related emergencies before they happen.

The best preparation is prevention. Do all you can to reduce your risk of unexpected events. Train employees to do their jobs correctly. Maintain good housekeeping standards at your business. Then, with a good plan, proper equipment and employees trained to respond quickly to an incident, you could lessen your cleanup costs, the impact on employee health and the environment, and future liability for your business.

Keep in mind: Occupational Safety and Health Administration (OSHA) regulations also require employers to plan for emergencies – those that could threaten worker safety. So, when planning for the possibility of a chemical spill, determine the size and type of spill you can handle routinely and the point at which a spill constitutes an emergency. If an emergency spill (determined by spill size, location or type of chemical) occurs, you will likely need to enlist specially trained spill-response workers to handle it.

Train employees in spill cleanup procedures for **routine** chemical spills. For small companies, the plan for emergency chemical spills may be to evacuate employees from the spill area and call for outside chemical spill-response assistance. It is usually not feasible for small companies to maintain their own staff of highly trained emergency spill-response

workers and the equipment that may be necessary to contain and clean up.

In addition to hazardous waste requirements discussed below, other agencies, such as OSHA, may require you to store products at your site in a way that will **prevent** incidents. Proper storage may include requirements such as:

- Store products in appropriate containers for the contents
- Ensure product containers are correctly labeled
- Store combustible and flammable products in fire-preventing cabinets or buildings

In addition, ensure that you are not exceeding maximum flammable material storage limitations for any type of occupancy established under Minnesota State Fire Code. When calculating the flammable material limit for a specific occupancy, remember to include both product and waste materials.

Voluntary actions like these may help you reduce the risk of incidents:

- Use less or non-hazardous products.
- Inspect containers before loading or unloading raw or waste materials.
- Maintain the smallest inventory of product possible for your operations.
- Empty storage containers using manually operated pumps or ejectors.
- Maintain an inventory of fluids to identify leaks and then fix them promptly.
- Use fill indicators for tanks and containers where content levels are not visible to employees.

Hazardous Waste Requirements

1. Establish and follow procedures to minimize the possibility of incidents that could threaten human health and/or the environment.
 - Close all hazardous waste containers.
 - Provide adequate aisle space in hazardous waste storage areas to allow easy inspection and removal of containers and enable employees to respond to emergencies.
 - Protect hazardous waste storage areas from inadvertent damage to containers by equipment or unauthorized personnel.
 - Seal floor drains near stored hazardous waste to prevent releases.
 - Conduct required weekly inspections of hazardous waste storage areas.
2. Have the following emergency equipment available:
 - An internal communications system capable of alerting personnel of emergencies (For small shops, the human voice may be sufficient. For larger shops, an intercom, loudspeaker, alarm system or telephone may be necessary.)
 - Immediate access to communications for employees working with hazardous waste

Examples of how to comply: Install an alarm call button or telephone in a storage room; train employees to carry hand-held radios or cellular telephones; require that employees use a ‘buddy system’ to ensure an employee working with hazardous waste is always within voice contact distance of another employee outside of the hazardous waste area.

Note: A fire alarm pull does not meet this requirement. In addition, if you install or intend use of potential ignition sources, such as telephones or radios, in a storage area that could exhibit a flammable atmosphere, you may be required to use intrinsically safe equipment.

 - A telephone or radio available to employees on the site to contact outside emergency services
 - Spill response equipment appropriate to the type and amount of wastes accumulated at the site
 - Decontamination equipment appropriate to the wastes accumulated at the site. OSHA regulations may specify equipment type, number, and locations.
 - Portable fire protection equipment – such as fire extinguishers (The Minnesota State Fire Code may specify equipment type, number, and locations.)

- Water at adequate volume and pressure to meet fire protection needs (The Minnesota State Fire Code may specify volume and pressure requirements for your site.)
3. Maintain and test all emergency equipment according to the manufacturer’s instructions to ensure proper operation in an emergency.
 - Ensure fire protection equipment is in operating condition and accessible at all times.
 - Ensure fire protection systems, including all portable fire extinguishers, are inspected and tested at least annually by a competent licensed individual.
 4. Attempt to make the following emergency arrangements with local authorities:
 - Measures to familiarize police, fire departments, and emergency response teams with the types of hazardous waste handled on site; the properties and hazards of that waste; storage and accumulation areas for the waste; employee work areas; employee evacuation routes; and facility access roads, both off and on site.
 - Agreements designating primary emergency authority in the event more than one law enforcement or fire department might respond to an emergency at the facility.
 - If appropriate to your facility, agreements with state emergency response teams, emergency response contractors and equipment suppliers.
 - Measures to familiarize local hospitals with the properties and hazards of the waste handled on site and the types of injury or illness that could result in an emergency.

You may attempt to make the arrangements by any means, including site visits, meetings, or mailed information. **Document your efforts.** The template, “Emergency Planning Packet for Small Quantity Generators,” may help you, but its use is not required. It is available on the MPCA Web site at www.pca.state.mn.us/publications/w-hw1-08b.dot

5. Designate an emergency coordinator.

An emergency coordinator must be on site or on call at all times. Ensure you have designated backup for any time the primary coordinator will be unavailable, such as vacations or illnesses. The emergency coordinator is responsible for coordinating the response to emergencies on site so must be knowledgeable about the hazardous wastes at the facility and the emergency response arrangements discussed above.

6. Post the following emergency information next to each telephone an employee might use in a hazardous waste emergency:

- The name and telephone number of the emergency coordinator (and backups)
- The telephone number of the fire department
- The location of fire extinguishers, spill control equipment and fire alarms

To meet this requirement, you may complete and post the template in the “Emergency Planning Packet for Small Quantity Generators,”

at www.pca.state.mn.us/publications/w-hw1-08b.dot

7. Train employees.

You must train employees who have hazardous waste emergency-related duties in emergency procedures relevant to their positions and specific to your facility. Document the training. For more information about training requirements, see MPCA Hazardous Waste fact sheet #1.09b, “Step 9: Personnel Training for Small Quantity Generators”, available on the MPCA Web site www.pca.state.mn.us/waste/pubs/business.html#general

OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) training may overlap training required by hazardous waste regulations. However, you must train employees in the emergency procedures specific to your facility operations and the kinds and amounts of hazardous waste you generate.

8. Report immediately to the Minnesota Duty Officer (available 24 hours a day) any release (including, but not limited to hazardous waste) that may cause pollution of the air, land or water. When reporting, be prepared to give the following information:

- Name and telephone number of the company contact person or person reporting the spill
- Quantity of material released
- Type of material released
- Date and time of release
- Health hazards associated with the material released
- Any injuries resulting from the release
- Name, address and Environmental Protection Agency (EPA) identification number of the site

More Information

Your Twin Cities metropolitan county and the Minnesota Pollution Control Agency have staff available to answer waste management questions. For more

information, contact your metropolitan county hazardous waste office or the MPCA office closest to your county.

Minnesota Technical Assistance Program (MnTAP) staff can help you find ways to improve efficiency and reduce waste.

Metro County Hazardous Waste Offices

Anoka	763-422-7093
Carver	952-361-1800
Dakota	952-891-7557
Hennepin	612-348-3777
Ramsey	651-266-1199
Scott	952-496-8475
Washington	651-430-6655
Web sites	www.co.[county].mn.us

Minnesota Duty Officer (24-hr number)

Greater Minnesota	1-800-422-0798
Local	651-649-5451
TDD	651-627-3529
FAX	651-296-2300
Web site	www.dps.state.mn.us

Minnesota Pollution Control Agency

Toll free (all offices)	1-800-657-3864
Brainerd	218-828-2492
Detroit Lakes	218-847-1519
Duluth	218-723-4660
Mankato	507-389-5977
Marshall	507-537-7146
Rochester	507-285-7343
St. Paul	651-296-6300
Willmar	320-214-3786
Web site	www.pca.state.mn.us

Minnesota Technical Assistance Program

Toll free	1-800-247-0015
Metro area	612-624-1300
Web site	www.mntap.umn.edu

National Response Center

Toll free	1-800-424-8802
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For questions about **OSHA requirements**, contact MnOSHA at 651-284-5050 or toll free 1-800-470- 6742, e-mail osha.compliance@state.mn.us, or visit the Web at www.dli.mn.gov/mnosha.asp

For questions regarding the **Minnesota State Fire Code**, contact the State Fire Marshal Office at 651-201-7200 or visit: www.dps.state.mn.us/fmarshal/fmarshal.html or <http://www.dps.state.mn.us/fmarshal/FireCode/FireCode.html>