



# Step 8: Plan for Emergencies

## Emergency planning for large quantity generators

Waste/Hazardous Waste #1.08c • January 2010

### Environmental concerns

**E**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.

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.

Minnesota Pollution Control Agency (MPCA) and metropolitan county hazardous waste staffs (Staff) offer recommendations throughout this document for achieving compliance.

### 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 1: A fire alarm pull does not meet this requirement.

Note 2: 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 (Minnesota State Fire Code may specify equipment type, number, and locations.)
  - Water at adequate volume and pressure to meet fire protection needs (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. Prepare and maintain an up-to-date contingency plan.

A contingency plan is a written document describing available equipment, procedures you will follow and arrangements you have made to prevent or minimize the hazards associated with hazardous waste.

Although Minnesota hazardous waste rules apply only to hazardous *waste*, Staff strongly encourages you to develop a comprehensive contingency plan that considers all potential hazards at your site.

Your facility may also be subject to other contingency planning requirements by other regulations, including but not limited to the

- Spill Prevention, Control, and Countermeasures (SPCC) requirements of the U.S. Environmental Protection Agency (EPA)

- A Workplace Accident and Injury Reduction (AWAIR)
- Hazardous Waste Operations and Emergency Response (HAZWOPER)
- Process Safety Management (PSM) requirements of the Minnesota Occupational Safety and Health Administration (MNOSHA).

Minnesota rules allow and Staff encourages you to integrate all applicable contingency plan elements into one combined contingency plan.

The Minnesota Pollution Control Agency (MPCA) offers a sample format for a contingency plan. Use of this format is not required; generators are encouraged to use a format that is most appropriate for their specific site. The sample format is available on the Web at [www.pca.state.mn.us/publications/w-hw1-08c-pckt.pdf](http://www.pca.state.mn.us/publications/w-hw1-08c-pckt.pdf)

Update your contingency plan whenever:

- the applicable State or Federal regulations change
- the plan fails in an emergency
- any of the information contained in the plan changes, including, but not limited to:
  - change in emergency coordinator
  - change in available emergency equipment
  - change in facility design, construction, operation, or maintenance

5. Submit copies of your up-to-date contingency plan to all the emergency response agencies identified in the plan. If your site is located in a metropolitan county, you may also be required to submit the plan to your county hazardous waste regulatory department.

## Contingency plan contents

At a minimum, a hazardous waste contingency plan must contain the following elements. (There is no specific order required for the information.)

### Emergency coordinator

An emergency coordinator must be on site or on call at all times. Ensure you have backup emergency coordinators designated for any time the primary coordinator will be unavailable, such as vacations or illnesses.

The emergency coordinator is responsible for coordinating the response to on-site emergencies and must be familiar with all elements of the contingency

plan and hazardous waste management at the site. The emergency coordinators must have the delegated authority to commit the resources needed to implement the contingency plan. You must identify and list the emergency coordinators in the order in which they should assume responsibility as well as all contact telephone numbers and addresses

### Emergency equipment

List all emergency equipment at your facility, including at least:

- fire extinguishing equipment and systems
- spill-control equipment
- internal/external communications and alarm systems
- decontamination equipment

Briefly outline the location, description, and capabilities of each piece of emergency equipment. Staff recommends that you include a facility diagram showing the location of emergency equipment and other relevant information, such as waste storage areas, access points, and evacuation routes. You may also want to include maintenance and inspection schedules in your contingency plan.

### Emergency response procedures

Describe the specific procedures you will follow when you activate the contingency plan. Activate the plan in the event of any hazardous waste-related fire, explosion, or release.

For each specific type of incident, identify:

- How appropriate employees will be notified, including criteria for activating site alarms
- How the identity, hazards, and appropriate response to any released materials will be determined. To meet this requirement, Staff recommends that you include in the contingency plan a list of all hazardous wastes generated at the site, their hazards, and appropriate response measures, as well as a diagram of their accumulation and storage locations.
- How employees responding to the incident will minimize risk to human health or the environment. (Include appropriate use of available emergency equipment or reference to local emergency response agencies.)

Identify in an employee's position description the specific responsibilities that employee has during an incident or emergency. Remember to provide appropriate and adequate job training to enable the

employee to respond effectively. Document the training in your hazardous waste training records.

For more information on the required hazardous waste training records, see the MPCA's Hazardous Waste fact sheet #1.09c, *Step 9: Personnel Training for Large Quantity Generators*, available on the Web at [www.pca.state.mn.us/waste/publications/w-hw1-09c.pdf](http://www.pca.state.mn.us/waste/publications/w-hw1-09c.pdf)

### Emergency reporting

Describe the procedures you will use to ensure the designated employee will report the incident immediately to the Minnesota Duty Officer, National Response Center, and local authorities, if applicable. Staff recommends that you include a list of emergency reporting telephone numbers in the contingency plan to facilitate meeting this requirement. Refer to page four for telephone numbers that may be of interest to you.

When calling, be prepared to give, at a minimum, this information:

- name and contact telephone number of the incident reporter
- name, address, and EPA identification number of the site
- date and time of the incident
- identity and quantity of material involved
- hazards to human health or the environment beyond the site from the incident
- injuries caused by the incident

### Evacuation plan

If a fire, explosion, or release of hazardous waste might make it necessary to evacuate all or a portion of a building, you must include an evacuation plan in your contingency plan. Describe the signals used to initiate the evacuation as well as the procedures for the actual evacuation. To help you meet this requirement, Staff recommends that you include a diagram, showing the location(s) of emergency and decontamination equipment, hazardous waste accumulation and storage areas and access points to the locations.

### Arrangements with local emergency response services

Arrange with your local police and fire departments, area hospital, emergency response contractors, and state or local government emergency response teams to provide the response you may reasonably need in the case of an emergency. Describe the emergency services you have arranged for in the contingency plan. Also, document

both successful agreements and attempts if declined by any service.

## Post-incident Reporting

Any time you activate your hazardous waste contingency plan, you must submit a written report to the MPCA or your metropolitan county hazardous waste program within 15 days of the incident. Your report must include:

- the information you reported to the Minnesota Duty Officer specified in the 'Emergency reporting' section above
- any revisions and additions to that information
- the quantity and disposition of any material resulting from the incident.

## 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 .....	<a href="http://www.co.[county].mn.us">www.co.[county].mn.us</a>

### 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 .....	<a href="http://www.dps.state.mn.us">www.dps.state.mn.us</a>

## 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 .....	<a href="http://www.pca.state.mn.us">www.pca.state.mn.us</a>

## Minnesota Technical Assistance Program

Toll free .....	1-800-247-0015
Metro area .....	612-624-1300
Web site .....	<a href="http://www.mntap.umn.edu">www.mntap.umn.edu</a>

## 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](mailto:osha.compliance@state.mn.us), or visit the Web at [www.dli.mn.gov/mnosha.asp](http://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](http://www.dps.state.mn.us/fmarshal/fmarshal.html) or [www.dps.state.mn.us/fmarshal/FireCode/FireCode.html](http://www.dps.state.mn.us/fmarshal/FireCode/FireCode.html)