



The National Park Service EnviroFact Sheet

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Managing Hazardous Waste: Planning for an Emergency (HW-5) DRAFT

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Planning for emergencies is a required aspect of hazardous waste management for small and large quantity generators of hazardous waste. These generators of hazardous waste must prepare and implement plans that show organized, planned and coordinated courses of action to be followed for minimizing hazards to human health or the environment during an emergency.

A **contingency plan** must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

Parks use **preparedness and prevention plans** to specify how their facilities will be designed, constructed, maintained and operated to minimize the possibility of emergency incidents (e.g., release of hazardous waste) through the use of fire protection systems, standard operating procedures, effective maintenance programs, and comprehensive emergency response procedures.

FOR MORE INFO...

OSHA: Emergency Preparedness and Response resources:
<http://www.osha.gov/SLTC/emergencypreparedness/index.html>

APPLICABLE REGULATIONS

If an NPS facility generates hazardous waste, it is required to comply with "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" under the Resource Conservation Recovery Act (RCRA). The facility's required level of preparedness is dependent upon the amount of hazardous waste generated monthly.



The regulations at 40 CFR 262.34(a)(4) require large quantity generators (LQGs – those that generate more than 1,000 kg of hazardous waste per month) to comply with the requirements in Subparts C and D in 40 CFR part 265. Subpart C outlines "Preparedness and Prevention" requirements. Subpart D outlines "Contingency Plan and Emergency Procedures" requirements. The regulations at 40 CFR 262.34(d) require small quantity generators (SQGs – those that generate 100–1,000 kg of hazardous waste per month) to comply with the "Preparedness and Prevention" requirements and basic contingency plan requirements of 40 CFR 262(d)(5). Conditionally exempt SQGs are not required to prepare Contingency Plans or Preparedness and Prevention Plans but should still establish basic procedures covering these areas as a best management practice.

The Occupational Safety and Health Administration (OSHA) also has established requirements for emergency response planning. OSHA requirements are summarized in checklist items 4 and 5 of this EnviroFact Sheet.

Most states have adopted preparedness and prevention regulations identical or similar to RCRA and OSHA regulations. However, state regulations can be more stringent than federal and should be reviewed. Local regulations concerning emergency response (ER) requirements, such as coordination with local ER agencies, should also be reviewed. Also, parks may be subject to additional contingency planning requirements (i.e., SPCC Plans) that can be combined into a single plan.

PREPAREDNESS AND PREVENTION PLAN REQUIREMENTS

Elements of a Preparedness and Prevention Plan include:

- Maintenance and operation procedures to minimize the possibility of a fire, explosion, or any release of hazardous waste or hazardous waste constituents;
- Provision of emergency response equipment, including an internal communications or alarm system;
- Access to communications or alarm systems whenever hazardous waste is being handled, and when only one employee is on the premises during operations;
- Maintenance of aisle space to allow the unobstructed movement of emergency response and cleanup equipment; and
- Development of relationships with local authorities most likely to be called upon to respond to an emergency situation.



CONTINGENCY PLAN AND EMERGENCY PROCEDURES

SQGs of hazardous waste are required to implement a basic contingency plan that includes:

- A provision that at all times there be at least one "emergency coordinator" either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures.
- Posting the following information next to the telephone:
 - a. The name and telephone number of the emergency coordinator;
 - b. Location of fire extinguishers and spill control material, and, if present, fire alarm; and
 - c. The telephone number of the fire department, unless the facility has a direct alarm.
- Training that enables all employees to be familiar with proper waste handling and emergency procedures relevant to their responsibilities.

If the facility is a LQG of hazardous waste, a full contingency plan must be implemented. Those requirements are summarized in checklist item 3.

HAZARDOUS WASTE EMERGENCY PLANNING COMPLIANCE CHECKLIST

| Checklist Item | Notes |
|---|-------|
| 1. Ensure that the park's hazardous waste generator status has been determined (refer to the EnviroFact Sheet - "Determining Generator Status (HW-4)"). | |
| 2. Confirm that RCRA emergency preparedness and prevention plan requirements have been prepared and implemented. | |
| <p>3. Confirm that RCRA contingency plan and emergency response procedures have been prepared and implemented as required according to your generator status. LQGs of hazardous waste are required to implement a full contingency plan as specified at Subpart D of 40 CFR 265. Required elements of the written plan include:</p> <ul style="list-style-type: none"> • Emergency procedures facility personnel must use in response to fires, explosions, or hazardous waste releases; • A coordinated emergency services plan agreed to by local police departments, fire departments, hospitals, and state and local emergency response teams; • A list of emergency coordinators that includes names, addresses, and telephone numbers of all persons qualified to act as emergency coordinators; • A list of emergency equipment, including location, physical description, and capabilities of each item listed; and • An evacuation plan for the safe egress of facility personnel. • This information must be kept up-to-date. | |
| <p>4. If the NPS facility does not allow its employees to engage in clean-up operations involving hazardous material, but has the potential for their release, an Emergency Action Plan must be established and include the following elements:</p> <ul style="list-style-type: none"> • Evacuation plan for personnel, including signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires); • Procedures to notify local agencies that are to conduct clean-up procedures; and • Clear specification that employees are not to engage in clean-up activities. | |
| <p>5. All facilities that engage in clean-up of hazardous materials spills (except incidental spills) are subject to the OSHA HAZWOPER standard contained in 29 CFR 1910.120(q). The plan must include the following provisions:</p> <ul style="list-style-type: none"> • An Incident Command Systems (ICS) to coordinate emergency response operations; • Proper emergency response equipment for employees; • Directive to limit the number of emergency response personnel at the emergency site; • Back-up personnel on stand-by with equipment ready to provide assistance or rescue; • A designated safety official knowledgeable in the operations implemented at the emergency response site; • Authority of the safety official to determine if a situation is "immediately dangerous to life and health" (IDLH) and/or to involve an imminent danger condition, and the authority to alter, suspend or terminate activities; • Appropriate decontamination procedures after emergency operations are completed; and • Support personnel that may be required to perform skilled tasks, such as operating heavy equipment. | |