CHAPTER 8: EMERGENCY RESPONSE PROGRAM

If you have at least one Program 2 or Program 3 process at your stationary source, then the CalARP regulations may require you to implement an emergency response program consisting of an emergency response plan, emergency response equipment procedures, employee training, and procedures to ensure that the program is current.

To be eligible for Program 1 status, you must ensure that response actions have been coordinated with local emergency planning and response agencies.

You are responsible for ensuring that any release from your stationary source can be handled effectively regardless of program level or whether you will respond to emergencies or not. If you plan to rely on local responders for some or all of the response, you must determine that those responders have both the equipment and training needed to do so. If they do not, you must take steps to meet any response equipment or training needs, either by developing your own response capabilities, developing mutual-aid agreements with other stationary sources, hiring response contractors, or providing support to local responders so they can acquire equipment or training. (See section 8.6 for guidance on coordinating with local response agencies)

8.1 NON-RESPONDING FACILITIES

EPA recognizes that in some cases (particularly for retailers and other small operations with few employees), it may not be appropriate for employees to conduct response operations for releases of regulated substances. Stationary sources whose employees will not respond to accidental releases of regulated substances do not need to meet the requirements of the emergency response program provided that they:

- Coordinate with local response agencies (i.e., CCCHSD, local fire department) to ensure that they will be prepared to respond to an emergency at the stationary source (See section 8.6 for more detail)

- Work with local planning entities to ensure that the stationary source is included within the Contra Costa County (CCC) Hazardous Materials Area Plan prepared under Emergency Planning and Community Right-to-Know Act (EPCRA, also known as SARA Title III). The CCC Hazardous Materials Area Plan addresses coordination of local, state, and federal emergency response agencies (pre-emergency planning, responsibilities, capabilities, training, notification policy, etc.). The stationary source must review the plan and ensure that all accidental releases from their processes can be adequately addressed through the CCC Hazardous Materials Area Plan. A copy of the CCC Hazardous Materials Area Plan is available at the CCCHSD office located at: 4333 Pacheco Boulevard, Martinez CA 94553.

- Coordinate with the local fire department, if the stationary source maintains flammable regulated substances (See section 8.6 for more detail)

- Identify the appropriate mechanism to notify emergency responders. Refer to the CCCHSD Notification Policy which is distributed with AB2185 Business Plan information and Underground Storage Tank requirements.

In addition to the emergency response requirements specifically identified in the CalARP regulation, the stationary source must also address the following California regulatory requirements:

- Cal/OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) standard, T8 CCR §5192 (q)(1), requires that stationary sources with the potential to release hazardous substances develop emergency action plans (T8 CCR §3220). The emergency action plan requires that stationary sources develop evacuation[(1)] procedures and routes, establish an alarm system (T8 CCR§6184), and conduct training for employees. The emergency action plan must be written if the stationary source has more than ten employees.

- California regulation (T19 CCR§2731) requires stationary sources (non-responding and responding) who handle hazardous substances to develop emergency response plans and procedures and submit an AB2185 Business Plan to CCCHSD, documenting the following emergency response information:
  - Notification Alarm Procedures
  - Evacuation Procedures
  - Emergency Equipment including: the location and use of each
  - Emergency Response Procedures, including the procedures for handling a release and a list of all emergency contact personnel
  - Employee Training Requirements including: initial and refresher training requirements, evacuation procedures, hazardous materials handling procedures, emergency response team procedures, and all training documentation
  - Site Layout and Facility Maps including: location of each hazardous material handling area, the type of storage, and the location of emergency response equipment

Sections 8.2 through 8.5 of this chapter are applicable only to those stationary sources that will respond to releases of regulated substances.

(1) CCCHSD has adopted the approach that the community and stationary sources not responsible for the release will initially be directed to shelter in place. Evacuations will only be required if the incident has potential to continue for an extended period (e.g., a train derailment of LPG railcars) or if there is immediate threat of fire/explosion.

WHAT IS A LOCAL EMERGENCY PLANNING COMMITTEE

Local emergency planning committees (LEPCs) are mandated by the Superfund Amendments and Reauthorization Act, Title III of 1986. There are six committees or regions in California, with Contra Costa County being in region 2, the Coastal Region. The LEPCs do not have offices or staffs. The committees are designed to disseminate information throughout the state and coordinate efforts between the Certified Unified Program Agencies (CUPAs). The LEPCs are responsible for awarding training and preplanning grants throughout the regions. LEPCs also supplement the emergency response activities by identifying and coordinating local and public response capabilities. The committee membership is mandated with 19 positions including: local government, local industry, transportation groups, health and medical organizations, community groups, and the media. All work is performed on a volunteer basis.

Contact the California Office of Emergency Services (OES) or CCCHSD for more information on your LEPC.

WHAT IS RESPONSE?

EPA has adopted the definition of response specified under Cal/OSHA's HAZWOPER Standard. OSHA defines emergency response as "a response effort by employees from outside the immediate release area or by other designated responders ... to an occurrence which results, or is likely to result, in an uncontrolled release of a hazardous substance." The key factor here is that their employer designates responders for such tasks. This definition *excludes* "responses to incidental releases of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel" as well as "responses to releases of hazardous substances where there is no potential safety or health hazard (i.e., fire, explosion, or chemical exposure)." Thus, if you expect your employees to take action to end a small leak (e.g., shutting a valve) or clean up a spill that does not pose an immediate safety or health hazard, this action could be considered an incidental response and you would not need to develop an emergency response program if your employees are limited to such activities. However, these employees should still be provided with the training, procedures, equipment, and personal protective equipment to safely perform these tasks as required by Cal/OSHA.

Due to the nature of the regulated substances subject to the CalARP regulations, only the most minor incidents would be included in this exception. In general, most activities will qualify as a response due to the immediacy of the dispersion of a toxic plume or spread of a fire, the volatilization of a spill, and the threat to people on and off site. As a result, if you will have your employees involved in any substantial way in responding to releases, you will need to develop an emergency response program. Your emergency response procedures need only apply to "response" actions; other activities will be described in your maintenance and operating procedures.

8.2 ELEMENTS OF AN EMERGENCY RESPONSE PROGRAM

If you will respond to releases of regulated substances with your own employees, your emergency response program must consist of the following elements:

- Coordinate with local response agencies to ensure that they will be prepared to respond to an emergency at the stationary source (See section 8.6 for more detail)

- An emergency response plan (maintained at the stationary source) that includes:

  - Procedures for informing and interfacing with the public and emergency response agencies about releases, planning, and response
  - Proper first aid and emergency medical treatment necessary to treat human exposures, and
  - Procedures and measures for emergency response.

- Procedures for using, inspecting, testing, and maintaining your emergency response equipment;

- Training for all employees in relevant procedures and relevant aspects of the Incident Command System; and

- Procedures to review and update, as appropriate, the emergency response plan to reflect changes at the stationary source and ensure that employees are informed of changes.

Your plan must be coordinated with the Contra Costa County (CCC) Hazardous Materials Area Plan developed under the Emergency Planning and Community Right-to-Know Act (EPCRA, also known as SARA Title III). In addition, at the request of local emergency planning or response officials, you must provide any information necessary for writing and implementing the CCC Hazardous Materials Area Plan. The CCC Hazardous Materials Area Plan addresses coordination of local, state, and federal emergency response agencies (pre-emergency planning, responsibilities, capabilities, training, notification policy, etc.). The stationary source must review the plan and ensure that all accidental releases from their processes can be adequately addressed through the CCC Hazardous Materials Area Plan. A copy of the CCC Hazardous Materials Area Plan is available at the CCCHSD office located at: 4333 Pacheco Boulevard, Martinez CA 94553.

In addition to the emergency response requirements specifically identified in the CalARP regulation, the stationary source must also address the following California regulatory requirements:

- Cal/OSHA's or EPA's Hazardous Waste Operations and Emergency Response (HAZWOPER) standard, T8 CCR §5192 and 40 CFR part 311 respectively, require that stationary sources with the potential to release hazardous substances develop and implement an emergency response plan and program if their employees will respond to the release. HAZWOPER addresses preparing an emergency response plan, employee training, medical monitoring, recordkeeping, and other issues.

- California regulation (T19 CCR§2731) requires stationary sources (non-responding and responding) who handle hazardous substances to develop

emergency response plans and procedures and submit an AB2185 Business Plan to CCCHSD, documenting the following emergency response information:

- Site Layout and Facility Maps including: location of each hazardous material handling area, the type of storage, and the location of emergency response equipment;
- Notification Alarm Procedures;
- Evacuation Procedures/Shelter-In-Place Procedures (for employees);
- Emergency Equipment including: the location and use of each piece;
- Emergency Response Procedures including: the procedures for handling a release and a list of all emergency contact personnel; and
- Employee Training Requirements including: initial and refresher training requirements, evacuation procedures, hazardous materials handling procedures, emergency response team procedures, and all training documentation.

The CalARP regulations state that a written plan complying with the California Consolidated Contingency Plan (CCP) format will satisfy the emergency response program requirement granted that section 2765.2(a) and (c) are satisfied. (See section 8.4 for more detail on the CCP). Furthermore, if you determine that the emergency response plan you have developed to comply with HAZWOPER satisfies the emergency response plan elements of the CalARP regulation, you will not have to do anything to comply. Additional guidance on determining if you are already in compliance is in section 8.5.

Be careful not to confuse writing a set of emergency response procedures in a plan with developing an emergency response program. An emergency response plan is only one element of the integrated effort that makes an emergency response program. Although the plan outlines the actions and equipment necessary to respond effectively, training, program evaluation, equipment maintenance, and coordination with local agencies must occur regularly if your plan is to be useful in an emergency. The goal of the program is to enable you to respond quickly and effectively to any emergency. The documents listed in Exhibit 8-1 may be helpful in developing specific elements of your emergency response program.

EXHIBIT 8-1
FEDERAL AND CALIFORNIA GUIDANCE ON EMERGENCY PLANNING AND RESPONSE

Hazardous Materials Emergency Planning Guide (NRT-1), National Response Team, March 1987. Although designed to assist communities in planning for hazmat incidents, this guide provides useful information on writing a response plan, planning teams, plan review, and ongoing planning efforts.

Criteria for Review of Hazardous Materials Emergency Plans (NRT-1A), National Response Team, May 1988. This guide provides criteria for evaluating response plans.

California Consolidated Contingency Plan, A format consistent with Section 25503.4 of the Health & Safety Code is provided.

North American Emergency Response Guidebook (NAERG96), U.S. Department of Transportation, 1996. This guidebook lists over 1,000 hazardous materials and provides information on their general hazards and recommended isolation distances. **NOTE**: The intent of this document was to provide general hazards and emergency actions for groups of chemicals and initial isolation and protective action distances to first responders. Stationary sources know the regulated substances that they maintain and therefore should be able to provide more specific information.

Material Safety Data Sheets (MSDS), Stationary sources must maintain copies of MSDS for the regulated substances onsite as part of their Hazard Communication requirement (T8 CCR §5194). Many of these documents contain emergency information.

California State Training Institute (CSTI) Standards, To order any course student manuals contact CSTI outreach at (805) 549-3534 for ordering information. These standards represent "best practice" and are therefore more stringent then other response regulations.

Response Information Data Sheets (RIDS), US EPA and National Oceanic and Atmospheric Administration. Developed for use with the Computer-Aided Management of Emergency Operations (CAMEO) software, these documents outline the properties, hazards, and basic safety and response practices for thousands of hazardous chemicals.

8.3 DEVELOPING AN EMERGENCY RESPONSE PROGRAM

The development of an emergency response program should be approached systematically. Stationary sources maintaining hazardous substances are already subject to Cal/OSHA HAZWOPER. As a result, you are likely to fall into one of two groups:

- You are already in compliance with several federal and state requirements for emergency planning and are interested in developing an integrated program to minimize duplication (section 8.4).

- You have a pre-existing emergency response program (perhaps based on an internal policy decision) and need to determine what additional activities you will need to conduct (section 8.5).

8.3.1 STEPS FOR GETTING STARTED

The following steps outline a systematic approach that can serve as the framework for the program development process in each of these two cases. Following these initial steps will allow you to conduct the rest of the process more efficiently.

Form an emergency response program team. The team should consist of employees with varying degrees of emergency responsibilities, as well as personnel with expertise from each functional area of your stationary source. You should consider including persons from the following departments or areas:

- Maintenance;
- Operations or line personnel;
- Upper and line management;
- Legal;
- Fire and hazmat response;
- Environmental, health, and safety affairs;
- Training;
- Security;
- EPCRA section 302 emergency coordinator (if one exists);
- Public relations; and
- Personnel.

The membership of the team will need to be more or less extensive depending on the scope of the emergency response program. A three-member team may be appropriate for a small stationary source with a couple of process operators cross-trained as fire responders, while a stationary source with its own hazmat team and environmental affairs department may need a dozen representatives.

Collect relevant facility documents. Members of the development team should collect and review all of the following:

- Existing emergency response plans and procedures;
- AB2185 Business Plan submissions to CCCHSD under Health & Safety Code 25500;
- Hazard evaluation and release modeling information;
- Hazard communication and emergency response training;
- Emergency drill and exercise programs;
- After-action reports and response critiques; and
- Mutual aid agreements.

Identify existing programs to coordinate efforts. The team should identify related programs emerging from the following:

- Corporate- and industry-sponsored safety, training, and planning efforts;
- Federal, state, and local government safety, training, and planning efforts (see Exhibit 8-2);
- Petrochemical Mutual Aid Organization (PMAO);
- Community Awareness Emergency Response (CAER); and
- Regional Hazardous Materials Response Organization (RHMRO).

Determine the status of each required program element. Using the information collected, you should assess whether each required program element (see section 8.2) is:

- In place and sufficient to meet the requirements of the CalARP regulation;
- In place, but not sufficient to meet the requirements of the CalARP regulation; or
- Not in place.

This examination will shape the nature of your efforts to complete the emergency response program required under the risk management program.

EXHIBIT 8-2
FEDERAL AND CALIFORNIA EMERGENCY PLANNING REGULATIONS

The following is a list of some of the federal emergency planning regulations:

- EPA's Oil Pollution Prevention Regulation (SPCC and Facility Response Plan Requirements) – 40 CFR part 112.7(d) and 112.20-.21;
- MMS's Facility Response Plan Regulation - 30 CFR part 254;
- RSPA's Pipeline Response Plan Regulation - 49 CFR part 194;
- USCG's Facility Response Plan Regulation - 33 CFR part 154, Subpart F;
- EPA's Risk Management Programs (RMP)Regulation - 40 CFR part 68;
- OSHA's Emergency Action Plan Regulation - 29 CFR §1910.38(a);
- OSHA's Process Safety Standard - 29 CFR §1910.119;
- OSHA's HAZWOPER Regulation - 29 CFR §1910.120;
- OSHA's Fire Brigade Regulation - 29 CFR §1910.156;
- EPA's Resource Conservation and Recovery Act (RCRA) Contingency Planning Requirements - 40 CFR part 264, Subpart D, 40 CFR part 265, Subpart D, and 40 CFR 279.52.
- EPA's Emergency Planning and Community Right-to-Know Act (EPCRA) Requirements - 40 CFR parts 355.30, 355.40, and 355.50. (These planning requirements apply to communities, rather than facilities, but will be relevant when facilities are coordinating with local planning and response entities).
- EPA's Stormwater Regulations – 40 CFR 122.26.

The following California regulations correspond to the preceding federal regulations:

- Cal/OSHA's Emergency Action Plan Regulation – T8 CCR §3220;
- Cal/OSHA's Process Safety Standard – T8 CCR §5189;
- Cal/OSHA's HAZWOPER Regulation – T8 CCR §5192; and
- Cal/OSHA's Fire Brigade Regulation – T8 CCR §3411.

Section 25503.4 of Health and Safety Code allows persons subject to two or more of the following requirements to meet those requirements in one document (e.g., the Consolidated Contingency Plan):

- Business Plan (corresponds to federal EPCRA) – T19 CCR §2731;
- Contingency Plan (corresponds to federal RCRA) – T22 CCR §66265;
- Underground Storage Tank - T23 CCR §2632(d)(2);
- Marine Plan – T14 CCR §817. T14 Division 1 (Fish and Game Commission) Subdivision 4 (Office of Oil Spill Prevention and Response) Chapter 3 (Oil Spill Prevention and Response Planning) Subchapter 3 (Oil Spill Contingency Plan);
- CalARP (corresponds to federal RMP) – T19 CCR §2735; and
- SPCC – Section 25270.5 of the Health and Safety Code and 40 CFR Part 112

CCCHSD has additional emergency planning expectations that are discussed in section 8.6.

8.3.2 TAILORING YOUR PROGRAM TO YOUR HAZARDS

If your processes and chemicals pose a variety of hazards, it may be necessary to tailor some elements of your emergency response program to these specific hazards. Unless each element of your program is appropriate to the release scenarios that may occur, your emergency response program cannot be fully effective. Your program should include core elements that are appropriate to most of the scenarios, supplemented with more specific response information for individual scenarios. This distinction should be reflected in your emergency response plan, which should explain when to access the general and specific response information. To do this, you will need to consider the following four steps:

- Identify and characterize the hazards for each covered process. The process hazards analysis *(see Chapter 7)*, hazard review *(see Chapter 6)*, and offsite consequence analysis (*see Chapter 4*) should provide this information.

- For each program element, compare the activities involved in responding to each type of accident scenario and decide if they are different enough to require separate approaches. For example, response equipment and training will likely be different for releases of toxic versus flammable gases.

- For those program elements that may be chemical- or process-specific, identify what and how systems and procedures need to be modified. For example, if existing mitigation systems are inadequate for responding to certain types of releases, you will need to consider what additional types of equipment are needed.

- Consider possible causes of emergencies and determine how they influence the development of your emergency response program. You should consider both the hazards at your stationary source as well as in the surrounding environment. In making this determination, you should consider your susceptibility to:

  - Fires, spills, and vapor releases;
  - Floods, temperature extremes, tornadoes, earthquakes, and hurricanes;
  - Loss of utilities, including power failures; and
  - Train derailments, bomb threats, and other man-made disasters.

8.4 INTEGRATION OF EXISTING PROGRAMS

A number of federal and California statutes and regulations require emergency response planning (see Exhibit 8-2). On June 5, 1996, the National Response Team (NRT), a multi-agency group chaired by EPA, published the Integrated Contingency Plan (ICP) Guidance in the *Federal Register* (61 FR 28642). The California Office of Emergency Services (OES) also developed a Consolidated Contingency Plan (CCP) format, pursuant to Health and Safety Code, Section 25503.4 that is consistent with the ICP format. As shown in Exhibit 8-3, the format is organized into three main sections: an introductory section, a core plan, and a series of supporting annexes. Both of these documents are intended to be used by stationary sources to prepare emergency response plans for responding to releases of hazardous substances. The documents provide comparison matrices for a number of federal and state programs that will help you accomplish the following:

- Distinguish the individual regulatory provisions with which you must comply, and
- Identify where an integrated effort can meet the requirements of two or more regulations.

The ICP and CCP documents do not change existing regulatory requirements; rather, they provide formats for organizing and presenting material currently required by the regulations. Individual regulations are more detailed than the ICP or CCP guidance. To ensure full compliance, you will still need to read and comply with all of the federal and California regulations that apply.

The requirements of various emergency response programs may be similar, but the subtle differences between requirements will likely determine the degree to which integration is a feasible and beneficial undertaking *(see Exhibit 8-4)*. To help you identify the relevant rules and regulations, the ICP Guidance and CCP format provide section-by-section regulatory citations for each emergency response program element for each of the regulatory programs listed in Exhibit 8-2. EPA's EPCRA/RCRA/Superfund Hotline can supply you with a copy of the ICP and answer general questions about the ICP guidance. OES can supply you with a copy of the CCP and answer general questions about the CCP. For further information and guidance on complying with specific regulations, you should contact the appropriate federal or state agencies.

EXHIBIT 8-3
INTEGRATED CONTINGENCY PLAN OUTLINE

Section I - Plan Introduction Elements

1. Purpose and Scope of Plan Coverage
2. Table of Contents
3. Current Revision Date
4. General Facility Identification Information
    a. Facility name
    b. Owner/operator/agent (include physical and mailing address and phone number)
    c. Physical address of the facility (include county/parish/borough, latitude/longitude, and directions)
    d. Mailing address of the facility (correspondence contact)
    e. Other identifying information (e.g., ID numbers, SIC Code, oil storage start-up date)
    f. Key contact(s) for plan development and maintenance
    g. Phone number for key contact(s)
    h. Facility phone number
    i. Facility fax number

Section II - Core Plan Elements

1. Discovery
2. Initial Response
    a. Procedures for internal and external notifications (i.e., contact, organization name, and phone number of facility emergency response coordinator, facility response team personnel, federal, state, and local officials)
    b. Establishment of a response management system
    c. Procedures for preliminary assessment of the situation, including an identification of incident type, hazards involved, magnitude of the problem, and resources threatened
    d. Procedures for establishment of objectives and priorities for response to the specific incident, including:
        (1) Immediate goals/tactical planning (e.g., protection of workers and public as priorities)
        (2) Mitigating actions (e.g., discharge/release control, containment, and recovery, as appropriate)
        (3) Identification of resources required for response
    e. Procedures for implementation of tactical plan
    f. Procedure for mobilization of resources
3. Sustained Actions
4. Termination and Follow-Up Actions

Section III - Annexes

Annex 1. Facility and Locality Information
    a. Facility maps
    b. Facility drawings
    c. Facility description/layout, including identification of facility hazards and vulnerable resources and populations on and off the facility which may be impacted by an incident

Exhibit 8-3 (Continued)

Annex 2. Notification
a. Internal notifications
b. Community notifications
c. Federal and state agency notifications
Annex 3. Response Management System
a. General
b. Command
c. Operations
d. Planning
e. Logistics
f. Finance/procurement/administration
Annex 4. Incident Documentation
a. Post accident investigation
b. Incident history
Annex 5. Training and Exercises/Drills
Annex 6. Response Critique and Plan Review and Modification Process
Annex 7. Prevention
Annex 8. Regulatory compliance and Cross-Reference Matrices

EXHIBIT 8-4

Written site evacuation and shelter-in-place procedures are required by several emergency-planning regulations. In keeping with the spirit of the ICP and CCP Guidance, rather than preparing multiple sets of evacuation and shelter-in-place procedures (and possibly introducing dangerous errors as components are revised and updated), you may want to compile a single set of procedures that includes the specific elements mandated by all of the regulations. For example, if you have one or more adjacent operating areas that evacuate to or shelter-in-place at the same location(s), this approach will be very effective. On the other hand, if you have widely separated operating areas with different routes and assembly points, integration will be less useful.

Evacuation Plan

Area	**Signal**	**Escape Route**	**Assembly Point**	**Supervisor**
Shipping Room	Horn	Blue	Front Gate	Shipping Supervisor
Control Room	Horn	Green	Parking Lot	Lead Operator
Tank Farm	Radio	Red	Side Gate	Inspector

Shelter-In-Place Plan

Area	**Signal**	**Route**	**Shelter Area**	**Supervisor**
Shipping Room	2-Horns	Yellow	Operations Center	Shipping Supervisor
Control Room	2-Horns	Orange	Operations Center	Lead Operator
Tank Farm	Radio	Purple	Operations Center	Inspector

8.5 AM I ALREADY IN COMPLIANCE?

EPA and CCCHSD believe that the creation of multiple response plans to meet slightly different federal or state standards is counterproductive, diverting resources that could be used to develop better response capabilities. Therefore, as part of the overall effort to reduce the imposition of potentially duplicative or redundant federal and California requirements, EPA and CCCHSD have limited their requirements for the emergency response program to the general provisions mandated by Congress.

As a result, EPA and CCCHSD believe that stationary sources subject to other federal and state emergency planning requirements may already be in compliance with these regulations. For example, plans developed to comply with other contingency planning requirements and the Cal/OSHA HAZWOPER rule (T8 CCR 5192) will likely meet the requirements for the emergency response plan (and most of the requirements for the emergency response program). The following discussion presents some general guidance on what actions you need to take for each of the required elements.

8.5.1 EMERGENCY RESPONSE PLAN

If you already have a written plan to comply with another planning regulation, you do not need to write another plan.

Keep in mind: At a minimum, your plan must describe:

- Your procedures for informing the public and offsite emergency response agencies of a release. This must include the groups and individuals that will be contacted and why, the means by which they will be contacted, the time frame for notification, and the information that will be provided. Refer to the CCCHSD Notification Policy which is distributed with AB2185 Business Plan information and Underground Storage Tank requirements. EPA recommends that stationary sources who experience a release contact the three levels of jurisdiction: federal, state, and local. The federal notification should be made to the National Response Center (NRC) when there is a release of a CERCLA hazardous substance at or above the reportable quantity. A written follow-up notification is also required as soon as practicable.

- The proper first aid and emergency medical treatment for employees, first responders, and members of the public who may have been exposed to a release of a regulated substance. This must include standard safety precautions for victims (e.g., apply water to exposed skin immediately) as well as more detailed information for medical professionals. You must also indicate who is likely to be responsible for providing the appropriate treatment: an employee, an employee with specialized training, or a medical professional.

- Your procedures for emergency response in the event of a release of a regulated substance. This must include descriptions of the actions to be taken by employees and other individuals on-site over the entire course of the release event:
  - Activation of alarm systems and interpretation of signals;
  - Safe shelter-in-place or evacuation, assembly, and return;
  - Selection of response strategies and incident command structure;
  - Use of response equipment and other release mitigation activities; and
  - Post-release equipment and personnel cleanup and decontamination.

8.5.2 PLANNING COORDINATION

One of the most important issues in an emergency response program is deciding which response actions will be assigned to employees and which offsite personnel will handle. As a result, talking to public response organizations will be critical when you develop your emergency response procedures (See section 8.6). Although OES and CCCHSD are not requiring you to be able to respond to a release, you should not simply assume that local responders will be able to manage an emergency. You must work with them to determine what they can do, and then expand your own abilities or establish mutual aid agreements to handle those situations for which you lack the appropriate training or equipment. If you already coordinate with local response agencies on how to respond to potential releases of regulated substances, you do not need to take any further action.

Keep in mind: Your coordination must involve planning for releases of regulated substances from all covered processes and must cover:

- What offsite response assistance you will require for potential release scenarios, including fire-fighting, security, and notification of the public;

- How you will request offsite response assistance; and

- Who will be in charge of the response operation and how will authority be delegated down the internal and offsite chain of command.

Also remember that public response organizations may not be able to respond to your stationary source during a major area event such as a large seismic event. The responders may be overtaxed and assigned to other locations. Coordination equivalent to that required for planning for extremely hazardous substances under EPCRA sections 302-303 will be considered sufficient to meet this requirement. A more detailed discussion of this element is provided in 8.6.

8.5.3 EMERGENCY EQUIPMENT

If you already have written procedures for using and maintaining your emergency response equipment, you do not need to write new procedures.

Keep in mind: Your procedures must apply to any emergency equipment relevant to a response involving a covered processes, including all detection and monitoring equipment, alarms and communications systems, and personal protective equipment not used as part of normal operations (and thus not subject to the prevention program requirements related to operating procedures and maintenance). The procedures must describe:

- How and when to use the equipment properly;
- How and when the equipment should receive routine maintenance; and
- How and when the equipment should be inspected and tested for readiness.

Written procedures comparable to those necessary for process-related equipment under the Cal/OSHA PSM Standard and CalARP regulation's Program 2 and 3 Prevention Programs will be considered sufficient to meet this requirement.

8.5.4 EMPLOYEE TRAINING

If you already train your employees in how to respond to (or evacuate or shelter in place from) releases of regulated substances, as appropriate, then you do not need a new training program.

Keep in mind: Your training must address the actions to take in response to releases of regulated substances from all covered processes. The training should be based directly on the procedures that you have included in your emergency response plan and must be given to all employees and contractors on site. Individuals should receive training appropriate to their responsibilities:

- If they will only need to evacuate, then their training should cover when and how to evacuate their location;
- If they may need to activate an alarm system in response to a release event, then their training should cover when and how to use the alarm system; and,
- If they will serve on an emergency response team, then their training should cover how to use emergency equipment and how the incident command system works.

Training should be conducted initially when the programs or plans are developed, when employee's responsibilities change, or whenever the plans are changed. Emergency response training conducted in compliance with the Cal/OSHA HAZWOPER Standard and the Emergency Action Plan regulation (T8 CCR §3220)

will be considered sufficient to meet this requirement. CCCHSD representatives review documentation of annual refresher training during the AB2185 Business Plan inspections.

8.5.5 RESPONSE PLAN EVALUATION

If you already have a formal practice for regular review and updates of your plan based on changes at the stationary source, you do not need to develop additional procedures.

Keep in mind: You must also identify the types of changes to the stationary source that would cause the plan to be updated (e.g., a new covered process) and include a method of communicating any changes to the plan to your employees (e.g., through training). You may want to set up a regular schedule on which you review your entire emergency response plan and identify any special conditions (e.g., a drill or exercise) that could result in an interim review. An annual review of the emergency response plan should be conducted with CCCHSD.

8.6 COORDINATION WITH LOCAL EMERGENCY PLANNING ENTITIES

Once you determine that you have at least one covered process, you should open communications (if you have not already done so) with your local fire department if you have flammable materials and CCCHSD if you have toxic materials. The coordination process will help both the community and the stationary source prepare for an emergency, reducing expenditures of time and money, as well as helping eliminate redundant efforts. In addition to the information provided to CCCHSD via the AB2185 Business Plan, you should coordinate with CCCHSD on the following: (Note, all of the following activities within the comprehensive list may not be applicable to your stationary source)

- Identification of the stationary source and agency roles and responsibilities including utilization of the incident command system (ICS) and agency responder's access to command post;
- Identification of a stationary source emergency coordinator who has authority to authorize actions and expenditures;
- Identification of Community Alert Network (CAN) zones. Necessary programming and planning will then be conducted to alert receptors in the CAN zones of level 3 releases;
- Verification of populations located in schools, general acute care hospitals, long-term health care facilities, and child day care facilities within a distance equal to the longer of a 1 mile radius or the distance to the ERPS reported in the offsite consequence analysis. CCCHSD intends on developing a "master list" of populations located in schools, general acute care hospitals, long-term health care facilities, and child day care facilities for Contra Costa County that can be provided to each stationary source. Stationary sources are responsible for

identifying the populations possibly impacted by accidental releases and for adding to and updating the list;

- Identification of the best method for initiating and coordinating with the Community Warning System (CWS);
- Coordination of activities with local emergency responders and mutual aid participants. The stationary source must evaluate the capabilities and limitations of their emergency response team, local responders, and mutual aid participants to identify if additional resources (e.g., trained personnel, equipment) are required;
- Development of a program for conducting drills should include specifying participants, developing scenarios, resolving recommendations, and evaluating performance;
- Installation of perimeter and internal monitoring capabilities and development of a community sampling program;
- Identification of emergency response equipment and controls (e.g., fire extinguishers, air-purifying respirators, secondary containment, fire monitors) and a description of the use, testing, inspection, and maintenance of each;
- Development of a means of reviewing and updating the emergency response program; and
- Development of notification procedures for local emergency responders and the public (e.g., notification of the fire/health services departments, initiation of the community warning system) should be developed. The following agencies and telephone numbers may be incorporated into the notification.

AGENCY	TELEPHONE NUMBER
Fire Department	911
CCCHSD	(925) 646-1112
California State OES	(800) 852-755
National Response Center	(800) 424-880
Bay Area Air Quality Management District	(800) 334-ODOR (6367)
Department of Fish and Game 24 hr.	(916) 445-004
United States Coast Guard Marine Safety Officer	(510) 437-3073
Cal/OSHA Concord Compliance Officer	(510) 602-6517
Regional Water Quality Control West County	(510) 286-1255
East County	(916) 255-3000

CCCHSD suggests that stationary sources collect the information needed to perform emergency pre-planning (i.e., the processes and chemicals of concern, the response capabilities and resources) and then send a letter to the Director of the Hazardous Materials Programs requesting a meeting to coordinate emergency response activities. If you are already coordinating with CCCHSD, you should include documentation of your coordination in the letter and ask whether any additional measures are needed to meet CCCHSD expectations.

For stationary sources that will respond to releases, CCCHSD can support your emergency response program by providing, or providing sources for, the following information:

- Data on wind direction and weather conditions, or access to local meteorological data, to help you make decisions related to the evacuation of employees and public alert notification;

- Lists of emergency response training programs available in the area for training police, medical, and fire department personnel, to help you identify what training is already available;

- Schedules of emergency exercises designed to test the community response plan to spur coordinated community-facility exercises;

- Lists of emergency response resources available from both public and private sources to help you determine whether and how a mutual aid agreement could support your program; and

- Details on incident command structure, emergency points of contact, availability of emergency medical services, and public alert and notification systems (the Community Warning System).

The stationary source should perform an annual review of the emergency response plan with CCCHSD to ensure that CCCHSD is aware of the scope of stationary source response efforts prior to an emergency. This annual review may be performed in conjunction with the AB2185 Business Plan inspections. Although the summary of your emergency response program will be publicly available as part of your RMP, this information may not be as current or as comprehensive.

Upon its completion, you should distribute your emergency response plan to the local response organizations, local hospitals, and other response organizations (e.g., state hazmat team) that request them. In some instances, only a portion of the plan may be of use to individuals or organizations; in such cases, you should consider making only that portion of the plan available. For instance, it may be appropriate to send a hospital only the sections of your plan that address emergency medical procedures and decontamination.

PLANNING FOR FLAMMABLE SUBSTANCES

In the case of regulated flammable substances, the fire department with jurisdiction over your facility may already be conducting fire prevention inspections and pre-planning activities under its own authority. Your participation in these efforts (as requested) will allow local responders to gather the information they need and prepare for an emergency. If there is no local fire department, or if there is only a volunteer fire department in your area, you may need to contact other local response or planning officials (e.g., police) to determine how you can work with the community.