# Emergency Response Coordination

# Checklist for Industry (40 CFR 68.93)

**Instructions**: Use this suggested checklist to schedule and document annual emergency response coordination activities required by 40 CFR 68.93. It is recommended that all related records be kept for at least 5 years.

**Disclaimer**: This checklist is being provided for general informational and planning purposes only and is not intended to replace legal or regulatory requirements under 40 CFR § 68.90 or any other applicable federal, state, or local laws.

## 1. Coordination Meeting Logistics

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| **Item** | **Status** | **Notes to be used to track progress** |
| **Who**: Identify your emergency response contact and participating local and State emergency response officials | ☐ | LEPCs, to include fire department, emergency management agency, police department, public health agency, hospitals and Regional Response Teams (RRT’s), etc. |
| **When**: Schedule annual coordination meeting logistics | ☐ | Purpose: to update and discuss information provided to local authorities and allow local authorities to provide feedback. |
| **Where**: Confirm location, attendance from key personnel | ☐ | Left up to the discretion of the owner/operator and local authorities. Can take place at LEPC meetings, at the facility, or even conference call/webinar |
| **How**: Document meeting date, location, topics discussed, and action items for improvement | ☐ | NC DPS’s Emergency Coordination Checklists is a useful tool for guidance:  [Risk Management Program (CAA 112r)](https://www.ncdps.gov/our-organization/emergency-management/hazardous-materials/risk-management-program-caa-112r) |

## 2. Information Sharing

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| **Item** | **Status** | **Notes** |
| **ER Contacts**: Provide updated 24/7 facility emergency contact information | ☐ | The ER Coordinator should be the person most familiar with your facility’s ER Plan. |
| **Site Map**: Identify buildings, hazard areas, site terrain, evacuation routes, assembly areas, site accessibility, work crew locations, Off-site impacts, etc.) | ☐ | In NC, recommend adding Site Map information to your [E-Plan](https://erplan.net/eplan/home.htm) account under the “Additional Information” tab.  **NOTE**: Applies to facilities with EPCRA 302 designation |
| **Alarms**: Discuss warning systems utilized to notify the facility personnel when accidental chemical releases occur | ☐ | Methods for leak detection, fires suppression, unauthorized entry, mass notification, surveillance cameras, etc. |
| **RMP**: Provide up-to-date RMP executive summary or full plan | ☐ | Identify potential areas of impact. RMP’s Hazard Assessment to include WCS/ACS, ERG’s IAPDs (Green pages) and local meteorological data. |
| **Process Hazards**: Discuss regulated process hazards | ☐ | May include toxic releases, fires, explosions, runaway reactions, Polymerization, over pressurization, corrosion, overfilling, contamination, equipment failure, etc. |
| **Process Controls**: Discuss controls utilized to prevent chemical accidental releases | ☐ | May include vents, relief valves, scrubbers, flares, manual shutoffs, interlocks, emergency power, rupture disks, quench systems, etc. |
| **Chemicals Hazards**: Share chemical, physical, and hazards data on regulated substances and quantities (ex: SDS’s) | ☐ | In NC, recommend adding SDS’s to your [E-Plan](https://erplan.net/eplan/home.htm) account under the “Additional Information” tab, focus on first aid and PPE. |
| **EAP**: Review Emergency Action Plan   |  |  | | --- | --- | | 1. Reporting Emergencies | ☐ | | 1. Evacuation Plans | ☐ | | 1. Emergency Procedures | ☐ | | 1. Rescue and Medical Duties | ☐ | | 1. Communication | ☐ | | 1. Training and Drills | ☐ | | 1. Accounting for Individuals | ☐ | | 1. Shelter-in-Place Procedures | ☐ | | 1. Direction and Control | ☐ | | 1. Resource Management | ☐ | | ☐ | 29 CFR 1910.38 requires Emergency Action Plans (EAP)  Chemical Release Reporting Requirements:   * 40 CFR 302 CERCLA Notification Requirements * EPCRA Section 304 Reportable Quantities   **NOTE**: Review EPA’s List of Lists for CERCLA and EPCRA reportable quantities (RQ) for the specific chemical’s onsite. |
| **ERP**: Emergency Response Plan   |  |  | | --- | --- | | 1. Hazmat Risk Assessment | ☐ | | 1. Emergency Communication | ☐ | | 1. Hazmat Team Training | ☐ | | 1. Response Procedures | ☐ | | 1. Evaluation/ Improvement | ☐ | | ☐ | **NOTE**: Only applies to “**Responding**” facilities. Any facility that plans to use its employees to take offensive responses because of an accidental release.  40 CFR 68.95 Emergency Response Program requires a program to protect public health and the environment. |
| **History**: Discuss past accidental releases and implemented corrective actions to avoid reoccurrence. | ☐ | 40 CFR part 68.42 five-year accident history, EPCRA Section 304 Notifications, OSHA 300 logs, and near-miss reports. |
| **Tier II**: Discuss any other chemical hazards and their on-site inventories | ☐ | EPCRA Section 312, Chemical Inventory  Reporting In NC, Tier II chemical inventory should be submittal through [E-Plan](https://erplan.net/eplan/home.htm) |
| **NFPA Requirements**: Review of applicable codes and standards related to the National Fire Protection Association |  | * NFPA 1 – Fire Code, * NFPA 72 – National Fire Alarm and Signaling Code, * NFPA 704 – Chemical Hazard Placarding, * NFPA 1660 – Standard for Emergency, Continuity, and Crisis Management, |
| **Hazardous Waste**: Discuss hazards and site locations of on-site hazardous waste | ☐ | 42 U.S.C. §6901 - Resource Conservation and Recovery Act, RCRA  NCDAQ- Hazardous Waste Section: 15A NCAC 13A .01 |
| **Transportation**: Discuss transportation routes of regulated substances into and out of the facility | ☐ | EPCRA Section 303, chemicals being transported through the community via highways, local roads, pipelines, and railroads and assessing potential impacts. |

## 3. Plan Coordination

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| **Item** | **Status** | **Notes** |
| **Roles**: Discuss emergency response roles and responsibilities for both the facility and local emergency responders | ☐ | Discuss incident command structure (ICS), details on structure, scalability, flexibility, collaboration, accountability, etc. |
| **Integration**: If you have multiple ER programs, you should consider integrating them into a single program. | ☐ | At a minimum, it must include procedures for informing the public and offsite ER agencies, first aid, emergency medical treatment, and procedures for ER response. |
| **Notifications**: Identify communication protocols during an emergency (federal, state, and local agencies) | ☐ | The purpose is to ensure facility personnel understand how to initiate the facility’s notification system and to test the emergency contact information to ensure accuracy. |
| **Chemical Spill Reporting**: Address chemical spill reporting requirements including CERCLA, EPCRA, RCRA, CWA, and HMTA | ☐ | * CERCLA/EPCRA: “Reportable Quantities” (RQ) * Clean Water Act (CWA): 40 CFR 110.3 * Resource Conservation and Recovery Act (RCRA) * Hazardous Materials Transportation Act (HMTA) |
| **Public Protection**: Ensure evacuation plans and shelter-in-place procedures | ☐ | Verbal and written information to be communicated, reverse 911, social media, translation services, etc. |
| **Environmental**: Plans to address runoff or other forms of environmental contamination resulting from chemical accidents. | ☐ | * 40 CFR Part 300: National Oil and Hazardous Substances Pollution Contingency Plan (NCP) * Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) * Oil Pollution Act (OPA 90) and Spill Prevention, Control, and Countermeasure (SPCC) |
| **Public Water Supplies**: Community water supply system’s contamination risk | ☐ | America’s Water Infrastructure Act (AWIA), amended EPCRA to ensure community water systems receive notification of reportable releases. |

## 4. Capability Assessment

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| **Item** | **Status** | **Notes** |
| **Updates**: Discuss any changes at the facility; ERP/EAP, and/or community emergency response plan since last meeting | ☐ | As required by 40 CFR part 68, updates can be found within PHA’s Revalidations, MOCs, Compliance Audits, and Incident Investigations. |
| **Contracts**: Evaluate mutual aid agreements or contracts with external resources (first responders, cleanup contractors, industry experts, etc.) | ☐ | List of emergency response resources available can help with determining whether and how mutual aid agreement could support the program. |
| **Capabilities**: Review and compare emergency response capabilities (equipment, personnel) | ☐ | To ensure effective preparedness, review and evaluate emergency response capabilities, including available equipment and trained personnel. |
| **Gaps Analysis**: Align response procedures with local community plans | ☐ | Identify potential chemical hazards at your facility, understand their risks, and evaluate emergency response capabilities to determine any gaps in response capabilities. |
| **Action Items**: Identify any recommended improvements for emergency response | ☐ | Identify actions to bridge response gaps, strategies for boosting response readiness, and steps to enhance emergency preparedness. |

## 5. Exercises & Training

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| **Item** | **Status** | **Notes** |
| **Notification Drills**: Coordinate annual notification drill (time/date/procedures) | ☐ | 40 CFR 68.96(a) Notification Exercise – Required at least once each calendar year  Test notification procedures to include contacting each person and agency on your contact list. |
| **Exercises**: Schedule or participate in joint drills or tabletop exercises | ☐ | 40 CFR 68.96(b) Emergency Response Exercise Program  Only required for “Responding” facilities with Program 2 or Program 3 processes |
| **Site Tours**: Offer site tours or walkthroughs for responders | ☐ | Look for hazardous materials labeling, proper storage, incompatibility assessments, waste disposal, SDS’s, fire suppression systems, emergency egress, fire code, etc. |
| **Training**: Discuss training needs or opportunities | ☐ | OSHA Hazard Communication Standard, Hazwoper, FEMA’s Emergency Management Institute, etc. |

## 6. Documentation

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| **Item** | **Status** | **Notes** |
| **Record**: Document who participated (names, agencies, titles, email, phone number, topics discussed) | ☐ | 40 CFR 68.90 requires a written record of the annual coordination activity. |
| **Action Items**: Record any action items or follow-up actions discussed | ☐ | **NOTE**: Action items may require further documentation through the facility’s Management of Change (MOC) procedures. |
| **Supporting Docs**: Track and retain any support documents utilized to support emergency coordination | ☐ | 40 CFR 68.90 requires a written record of each annual coordination activity and notification exercise within the last 5 years |
| **Scheduling**: Plan next annual coordination activity | ☐ | 40 CFR 68.93 requires coordination to occur at least annually, and more frequently if needed |