



Risk Management Program Emergency Coordination Checklists

North Carolina Emergency Management

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Executive Summary

The Risk Management Program (RMP) includes a set of facilities under the Emergency Community Right to Know Act (EPCRA) that have toxic or flammable extremely hazardous substances. Due to the hazardous nature, facilities implement chemical accident prevention methods and partner with local responders, emergency managers and Local Emergency Planning Committees (LEPC) to identify the potential effects of a chemical accident, steps the facility is taking to prevent an accident, and plan emergency response procedures should an accident occur.

Over a ten-year period, the number of chemical accidents at RMP facilities have decreased each year, which means facilities and responders have less hands-on accidental release experience. In December 2019, the RMP reconsideration rule was signed promoting better emergency planning and public information about accidents. Beginning in 2018, facilities are to schedule an annual coordination meeting with local responders and between 2023 to 2026 exercise plans, schedule and tabletop exercises will be implemented depending on the facility RMP level and responding status. The March 2024 RMP final rule added a field exercise and public notification procedures. This information is intended for RMP facilities and may also be applied to EPCRA hazardous material facilities.

Local responders, emergency managers and LEPCs coordinating with facilities may provide additional insight on community resources available. Coordination meetings may also identify gaps between facility and community response leading to improved response programs for both entities. To aid in coordination, this guidance document provides checklists to assist review of facility notification, emergency response or action plans and emergency exercise plans. The checklists are for both facilities and community resources to verify between the facility, local responders and contractors that trained hazmat personnel and equipment as well as medical and transportation resources are available.



Definitions

Program levels under 40 Code of Federal Regulation Part 68, Chemical Accident Prevention Provisions are listed on the facility's Environmental Protection Agency Risk Management Plan by process chemical. The program levels are:

Program Level 1: No significant off-site release within the past 5 years, no off-site consequences.

Program Level 2: Worst case release has off-site consequences with public receptors.

Program Level 3: Worst case release has off-site consequences with public receptors and the facility is subject to OSHA Process Safety Management (PSM).

Accidental Release means an unanticipated emission of a regulated substance or other extremely hazardous substance into the ambient air from a stationary source (facility).

Annual Coordination means the facility must document coordination with local authorities, including: The names of individuals involved and their contact information (phone number, email address, and organizational affiliations); dates of coordination activities; and nature of coordination activities.

The purpose of the annual coordination is to allow facilities to update and discuss the information being provided to local authorities, and to allow local authorities to provide facilities with updated information on how the source is addressed in the community emergency response plan. The forum for coordination meetings is left up to the discretion of the owner or operator and local response authorities.

Public receptor means offsite residences, institutions (e.g., schools, hospitals), industrial, commercial, and office buildings, parks, or recreational areas inhabited or occupied by the public at any time.

Non-Responding Facility means employees will not respond to accidental releases. The facility is responsible for evacuating employees and coordinating response plans with local emergency responders. The facility must ensure that local responders or hired contractors will be prepared to respond to an emergency at the facility.

Responding Facility means designated employees or responders are properly trained to respond to accidental releases of a hazardous regulated substances.



Emergency Exercise Response Requirements by Program Level

A Risk Management Program facility is required to include the following items depending on their program level, located on the facility EPA RMP Report, Section 1. Registration Information under Process Chemical.

Requirement	Start Date	Citation	Program 1	Program 2	Program 3
All Facilities					
Facilities complete annual emergency response coordination ¹ with local responders	03/14/2018	§68.10(b) §68.93		X	X
Facilities with toxic substances must be included in the community emergency response plan	Chemical onsite	§68.12(b)(3) §68.90(b)(1) §68.95(c)	X	X	X
Facilities with flammable substances must coordinate with local fire department(s)	Chemical onsite	§68.12(b)(3) §68.90(b)(2) §68.95(c)	X	X	X
Annual Notification Exercises	12/19/2024	§68.96(a)		X	X
Public Notification Procedures	5/10/2027	§ 68.210(d) through (h)	X	X	X
Non-Responding Facility – will not respond to accidental release					
Emergency Action Plan	Chemical onsite	§1910.38		X	X
Appropriate mechanisms are in place to notify emergency responders when there is a need for a response	Chemical onsite	§68.90(b)(3)	X	X	X
Responding Facility - will respond to accidental release					
Implement an emergency response program (OSHA's HAZWOPER standard 29 CFR 1910.120)	Chemical onsite	§68.95 §1910.120(q)		X	X
Emergency Response Exercise Program (written) Field and Table Top Exercises	12/19/2023	§68.96(b)		X	X
Emergency Response Exercise Program – Report Exercises Completed	12/19/2024	§68.10(f)		X	X
Table Top Exercises – Conduct (3-yr frequency)	12/21/2026	§68.96(b)(2)		X	X
Field Exercise – Conduct (10-yr frequency)	3/14/2027	§68.96(b)(1)(ii)			

¹ Annual coordination should address changes at the stationary source, source's emergency response plan, and the community plan.



Emergency Action Plan versus Emergency Response Plan Requirements Applies to Program Level 2 or 3

A Risk Management Program facility indicates if they are a responding or non-responding facility on the facility EPA RMP Report under Section 9. Emergency Response.

Requirement	Citation	Emergency Action Plan ¹	Emergency Response Plan ²
Procedures for reporting a fire or other emergency	§1910.38(c)(1)	X	
Procedures for emergency evacuation, including type of evacuation and exit route assignments	§1910.38(c)(1)	X	
Procedures to be followed by employees who remain to operate critical plant operations before they evacuate	§1910.38(c)(1)	X	
Procedures to account for all employees after evacuation	§1910.38(c)(1)	X	
Procedures to be followed by employees performing rescue or medical duties	§1910.38(c)(1)	X	
The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan	§1910.38(c)(1)	X	
Inform the public and the appropriate Federal, state, and local emergency response agencies about accidental releases	§68.95(a)(1)		X
Document first-aid and emergency medical treatment needed if exposed	§68.95(a)(1)		X
Procedures for emergency response after an accidental release	§68.95(a)(1)		X
Procedures for the use of emergency response equipment and for its inspection, testing, and maintenance	§68.95(a)(2)		X
Training for all employees in relevant procedures	§68.95(a)(3)		X
Procedures to review and update the emergency response plan as appropriate	§68.95(a)(4)		X

¹Emergency Action Plans are required for non-responding facilities based on 29 CFR 1910 Occupational Safety and Health Standards.



Emergency Response and Action Plan Reviews Required and Best Practice Checklists

The following sections are intended to assist review of a facility's emergency response or action plan and how information from these plans can be incorporated into a community contingency plan. The checklists are intended to provide items to consider and are not all-inclusive. Each facility and community are unique and coordination between multiple agencies is recommended to develop emergency response plans.

EPCRA Requirements

Facility and/or community Emergency Response Plans (ERP) and Emergency Action Plans (EAP) or other documents are required to contain the following EPCRA Requirements.

- Routes: Identification of routes likely to be used for the transportation of substances on the list of extremely hazardous substances.
 - Risk Facilities: Identification of additional facilities contributing or subjected to additional risk due to their proximity to facilities, such as hospitals or natural gas facilities.
 - Methods and procedures to be followed by facility owners and operators and local emergency and medical personnel to respond to any releases of such substances.
 - Contacts: Designation of a community emergency coordinator and facility emergency coordinators, who shall make determinations necessary to implement the plan.
 - Notifications: Procedures providing reliable, effective, and timely notification by the facility emergency coordinators and the community emergency coordinator to persons designated in the emergency plan, and to the public, that a release has occurred.
 - Release: Methods for determining the occurrence of a release, and the area or population likely to be affected by such release.
- Equipment: A description of emergency equipment and facilities in the community and at each facility in the community subject to EPCRA requirements, and an identification of the persons responsible for such equipment and facilities.
 - Evacuation Plans: Including provisions for a precautionary evacuation and alternative traffic routes.
 - Training programs, including schedules for training of local emergency response and medical personnel.
 - Exercises: Methods and schedules for exercising the emergency plan.

Facility Resources Review

What is the status of the facility plan? Is the plan consistent with any community emergency plan?

- Emergency Contact: Who is the emergency contact for the site (person's name, position, and 24-hour telephone number) and what is the chain of command during an emergency? Is the contact the same for RMP and Tier II?
- Facility Map: Does the facility map clearly identify the RMP/hazardous chemicals? Does it indicate safe areas for responders? Is a copy included the electronic Tier II submittal?
- Medical: What emergency medical care is available onsite?
- Coordination: How do facility personnel coordinate with the community government and local emergency and



medical services during emergencies? Is overlap avoided?

- Facilities under OSHA HAZWOPER, does their plan include developing and managing an onsite incident command system during the emergency?
- Has secure information been identified or is information included that could pose facility security vulnerabilities?
- Does the plan identify both hazards at the facility and in the surrounding environment such as:
 - Floods, temperature extremes, tornadoes, earthquakes, and hurricanes;
 - Loss of utilities, including power
 - Train derailments, truck accidents, and other man-made disasters
- If the facility is submitted an updated plan, does it include:
 - Major design or operation changes
 - Major mitigation technologies or procedures changes
 - Changes to the hazard assessment that revise the area of the vulnerable zone
 - Changes to key personnel

Chemical Information

- Chemical List: Is there a list of potentially toxic chemicals available? What are their physical and chemical characteristics, potential for causing adverse health effects, controls, interactions with other chemicals?
- Hazard Analysis: Does the plan include the hazard analysis, otherwise has a copy been provided to the local responders or the LEPC? Does the analysis include:
 - Affected population
 - Sensitive receptors within the vulnerable zone
 - Areas that may need to evacuate
 - Shelter locations

- Mitigation: What release prevention or mitigation systems, equipment, or procedures are in place? Is a description provided with their Tier II submittal under additional information?
- Concentration: What will determine concentrations of released chemicals existing at the site? (Are there toxic gas detectors, explosimeters, or other detection devices positioned around the facility? Where are they located?).
- Are wind direction indicators positioned within the facility perimeter to determine chemical release travel direction? Where are they located?
- Is there capability for modeling vapor cloud dispersion?
- Decontamination: Does the plan include information on decontaminating personnel and equipment?

Notifications and Evacuation

- Employee Evacuation Plans: Are they included in the facility plan. Do they include routes, mustering points and evacuation procedures?
- What training is provided to employees on evacuating in the event of an emergency?
- What kinds of notification systems connect the facility and the local community emergency services (e.g., direct alarm, direct telephone hook-up, computer hook-up) to address emergencies onsite?
- What is the mechanism to alert employees and the surrounding community in the event of a release at the facility?
- Site Security: Does the plan include site security and control information during and after the emergency?

Equipment

- Response equipment: Is a description included of onsite emergency response



equipment and trained personnel available to provide on-site initial response efforts?

- Personal protective equipment: e.g., self-contained breathing apparatus, chemical suits available?
- Fire-fighting equipment: e.g., unmanned fire monitors, foam deployment systems available?
- Communication equipment: e.g., radios, beepers notification or alarm systems are available?
- Is equipment available for loan or use by the community on a reimbursable basis? (Note: Respirators should not be lent to any person not properly trained in their use.)
- Are auxiliary power systems available to perform emergency system functions in case of power outages?
- Is there a method for identifying emergency response equipment problems?

Safety Training Plan

For Management and Employees

- Are employees trained to use emergency response equipment, personal protective equipment, and are emergency procedures detailed in the plan? How often is training updated?
- Are simulated emergencies conducted for training purposes? How often? How are these simulations evaluated and by whom? When was this last done? Are the local community emergency response and medical service organizations invited to participate?
- Are employees given training in methods for coordinating with local community emergency response and medical services during emergencies? How often?
- Is management given appropriate training? How frequently?

Risk Reduction

- Have operation or storage procedures been modified to reduce the probability of a release and minimize potential effects?
- What steps have been taken to reduce identified risks?
- How does the company reward good safety records?

Post Incident

- Are there any contracts or other prearrangements in place with specialists for cleanup and removal of releases, or is it handled in-house? How much time is required for the cleanup specialists to respond?
- Did the RMP chemical release have off-site consequence requiring a public meeting, §68.10(e)? Will the facility involve local responders?

Items to Consider

- Are there possibilities for safer substitutes of acutely toxic chemicals used or stored at the facility?
- What possibilities exist for reducing the volume of the hazardous materials in use or stored at the facility?
- What additional safeguards are available to prevent accidental releases?
- Have local responders provided the facility lists of emergency response training programs and resources available in the area to help them identify available training?



Community Resource Review

- Does the community know about the meaning of various alarms or warning systems?
- What is the current status of community planning and coordination for hazardous materials emergency preparedness? Have potential overlaps in planning been avoided?
- Do the community procedures need to be updated for protecting citizens during emergencies (e.g., asking them to remain indoors, close windows, turn off air-conditioners, tune into local emergency radio broadcasts)? Has the community been educated about these precautions?
- Has the facility been provided an up-to-date source list with a contact, position, and telephone number for technical information assistance? This can be Federal (e.g., NRC, USCGCHRIS/HACS, ATSDR, OHMTADS), state, industry associations (e.g., CHEMTREC, CHLOREP, AAR/BOE), local industry groups (e.g., local AIChE, ASME, ASSE chapters), academic institutions, and poison control center?

Medical

- Are the local hospitals prepared to accept and provide care to patients who have been exposed to facility chemicals?
- Are local hospitals able to decontaminate and treat numerous exposure victims quickly and effectively?

Support and Equipment

- Is there a standard operating procedure for the personal protection of community members at the time of an emergency?
- Is there a mechanism that enables responders to exchange information or ideas during an emergency with other entities, either internal or external to the existing organizational structure?

- Does the community have a communications link with an Emergency Alert System (EAS) station? Is there a designated emergency communications network in the community to alert the public, update the public, and provide communications between the command center or emergency operating center, the incident site, and off-scene support? Is there a backup system?
- What mutual aid agreements are in place for obtaining emergency response assistance from other industry members? With whom?
- Does the facility have the capability and plans for responding to off-site emergencies? Is this limited to the facility's products?
- Does the community technical reference library of response procedures for hazardous materials need to be updated?
- Does the specific community points of contact and what are their emergency responsibilities are need to be updated based on the facility's plan?
- Is there any specific chemical or toxicological expertise available in the community, in industry, colleges and universities, poison control centers, or on a consultant basis to address new chemicals at the facility?
- What kinds of equipment and materials are available at the local level to respond to emergencies? How can the equipment, materials, and personnel be made available to trained users at the scene of an incident?
- Does the community have specialized emergency response teams to respond to hazardous materials releases or will the NCEM RRT be utilized?
- If the NCEM RRT will be utilized, do they have a copy of the facility and/or community response plans?



Transporter Resource Review

- What cargo information and response organization do ship, train, and truck operators provide at a release?
- Do transport shipping papers identify hazardous materials, their physical and chemical characteristics, control techniques, and interactions with other chemicals?
- Do transports have proper placards?
- Are there standard operating procedures (SOPs) established for release situations? Have these procedures been updated to reflect current cargo characteristics?
- Who is the emergency contact for transport operators? Is there a 24-hour emergency contact system in place? What is the transport operation's chain of command in responding to a release?
- What equipment and cleanup capabilities can transport operations make available?
- What emergency response equipment is carried by each transporter?
- Do transports have first-aid equipment?
- By what means do operators communicate with emergency response authorities?
- Do transport operations have their own emergency response units?
- What arrangements have been established with cleanup specialists for removal of a release?
- Are transports equipped with satellite transponders? Can they be used to communicate emergencies?
- Are operators trained in release SOP and to use emergency response equipment? How often is training updated?
- How often are release drills conducted? Who evaluates these drills and do the

evaluations become a part of an employee's file?

- Are safe driving practices addressed in operator training? What monetary or promotional incentives encourage safety in transport operation?

Effective Community Communication

- Recognize the need to enhance the capacity of community members' understanding of the information to be disseminated in the event of an accident
- Consider the readability of information before producing outreach materials
- Explain technical information in lay terms
- Clearly present information in a way that avoids misunderstandings
- Conduct community forums in accessible locations and at times accessible for community members
- Leverage non-traditional engagement and communication methods (such as social media) to engaging members of the public in a participatory process. Remember social media and technology, should enhance, but not take the place of face-to-face engagement with community members
- Ensure the availability of translation services to address language barriers
- Demonstrate respect for varied occupations and work schedules
- Provide both verbal and written information when necessary



Hazardous Waste Contingency Plan Checklist

Contingency plans describe actions to take to minimize hazards to human health and the environment from fires, explosions, or unplanned releases of hazardous waste constituents to air, soil or surface water.

Large Quantity Generator

Applies to a large quantity generator where hazardous waste is generated or accumulated on site. Contingency plans must include the following according to 40 CFR 262.260-265. SOURCE: 81 FR 85823, Nov. 28, 2016

- Include of facility personnel actions in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste.
- Describe arrangements agreed to with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, local hospitals or, if applicable, the Local Emergency Planning Committee, pursuant to §262.256.
- List names and emergency telephone numbers emergency coordinators, and this list must be kept up to date with primary and alternates identified. In situations where the generator facility has an emergency coordinator continuously on duty because it operates 24 hours per day, every day of the year, the plan may list the staffed position as well as an emergency telephone number that can be guaranteed to be always answered.
- Include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.
- The plan must include an evacuation plan for generator personnel where there is a possibility that evacuation could be necessary. This plan must describe 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).
- The large quantity generator must submit a copy of the contingency plan and all revisions to all local emergency responders (i.e., police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency services). This document may also be submitted to the LEPC.
- A Quick Reference Guide must also be provided to responders that includes:
 1. The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid);
 2. The estimated maximum amount of each hazardous waste that may be present at any one time;
 3. The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff;
 4. A map of the facility showing where hazardous wastes are generated,



accumulated and treated and routes for accessing these wastes;

5. A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers;

6. The locations of water supply (e.g., fire hydrant and its flow rate);

7. The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and

8. The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

- Generators must update, if necessary, their quick reference guides, whenever the contingency plan is amended and submit these documents to the local emergency responders, as appropriate, the LEPC.



Emergency Incident Checklists

Chemical Release Hazard Specific Checklist

Items to consider in a chemical release for the facility and local responders.

- Briefing regarding release from reliable source
 - PPM concentration if toxic
 - Vapor density of gas released
 - Weather
 - Wind direction
 - Size of release
 - Expected duration
- Hazards – Brief industry and responders on flammable and toxicity hazards
- Clarify and confirm priorities
 - Rescue and medical treatment
 - Secure incident to mitigate further consequences
 - Environmental concerns
 - Evidence preservation/Secure the site
- Area Map – review with Incident Commander (IC)
- Modeling data, meteorological data of plume (from PEAC-WMD or Division of Air Quality)
- Off-site Impacts – identify if neighboring persons or livestock will be impacted by plume
- Evacuate or Shelter in Place – interface with agency Incident Command regarding decisions to evacuate or shelter in place
- Public Notification – Assist in notifying and the appropriate Federal, state, and

local emergency response agencies about accidental release

- Media Notification – Assist in notifying
- Downwind Ignition Source – Assist with eliminating downwind sources
- Mobilize industrial personnel and equipment as necessary
- Stage Upwind – Assure staging is upwind in a safe location and communicate location to industrial and local responders
- Notify Corporate – Determine if corporate management is involved and received release notification

Post Incident Items

- Mutual Aid Agreements – complete as necessary for financial and legal assistance
- Public Meetings – the facility will be required within 90 days for RMP reportable accidents with offsite consequences to hold a public meeting (40 CFR 68.19(e))
- Remediation and site clean-up
- Rebuild/restart facility operations
- Facility lead – Incident investigation team selection
 - Plan for witness interviews
 - Initial incident photography
- Plan for evidence documentation, identification, preservation, collection including handling time sensitive material (electronic process data, chemical samples, items impacted outside facility boundary). Check before initiating clean-up support.



Emergency Exercise Plan Review Checklist

Notifications Exercise

The purpose of notification exercises is to ensure facility personnel understand how to initiate the notification system and to test the emergency contact information to ensure it is accurate and up to date. The exercise plans should include:

- Clear indication the notification is an exercise
- Contacting each person and agency on the facility emergency action contact list (e.g., LEPC, fire department, etc.)
- Verification that contact information is accurate

Field Exercise

RMP Program Levels 2 and 3

- Did the facility coordinate with local public emergency response officials to design the exercise plan and establish appropriate exercise schedules
- Is the scenarios based on the regulated substances present at the facility
- Is the exercise plan consistent with the needs and resources of regulated facilities and local communities
- Does the plan allow flexibility for local responders to test or simulate offsite emergency response actions such as community notification, public evacuations, and sheltering in place
- Tests of procedures to notify the public and the appropriate Federal, state, and local emergency response agencies about an accidental release
- Tests of procedures and measures for emergency response actions including evacuations and medical treatment

- Tests of communications systems
- Mobilization of facility emergency response personnel, including contractors, as appropriate
- Coordination with local emergency responders
- Emergency response equipment deployment
- Procedure for identifying shortfalls and corrective action

Tabletop Exercise

RMP Program Levels 2 and 3

- Procedures to notify the public and the appropriate Federal, state, and local emergency response agencies
- Procedures and measures for emergency response including evacuations and medical treatment
- Identification of facility emergency response personnel and/or contractors and their responsibilities
- Coordination with local emergency responders; procedures for emergency response equipment deployment
- Procedure for identifying shortfalls and corrective action

Items to Consider

- Conducting joint exercises with other EPCRA/RMP facilities
- Conducting exercise to meet other federal, state, or local exercise requirements



References

Center for Chemical Process Safety, *Guidelines for Investigating Chemical Process Incidents Second Edition*, 2003.

Environmental Protection Agency, *General Risk Management Program Guidance, Chapter 8 Emergency Response Planning*, 1996.

Environmental Protection Agency, *Risk Management Program Handbook, Emergency Response Program*, 2021.

National Response Team, *Hazardous Materials Emergency Planning Guide*, 2001.