

Large Quantity Generator Emergency Response Plan

Introduction:

This guide is a reference for large quantity hazardous waste generators (LQGs) to assist with emergency planning, specifically a contingency plan and quick reference guide according to state and federal regulations. Regulation standards used for this document can be found in 40 CFR §§ 262.261, 262.262, and A.A.C R18-8-262.

Contingency Plan:

Contingency plan means a document setting out an organized, planned, and coordinated course of action to be followed in case of a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. A contingency plan is required to be in place for a large quantity generator. 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 Local Emergency Planning Committee, as appropriate. A checklist of the requirements for a contingency plan is available here: [Contingency Plan Reference Checklist \(LQGs\)](#)

Arrangements with Local Authorities:

Small quantity generators (SQGs) and large quantity generators (LQGs) of hazardous waste must comply with Resource Conservation and Recovery Act (RCRA) requirements to attempt to make arrangements with local authorities (e.g., police, fire departments, hospitals and emergency response teams) in the event the facility requires their services. The arrangements involve familiarizing authorities with the hazards, properties, and locations of hazardous waste generated, as well as the facility layout, including areas normally occupied by personnel and potential evacuation routes. The following provides recommendations on how facilities can document these arrangement efforts.

Planning and Documenting Arrangements with Local authorities

Both SQGs and LQGs are required to demonstrate arrangement efforts made with local authorities. Facilities can obtain written agreements or document verbal agreements in a number of ways. Facilities may choose to schedule an onsite visit to acquaint emergency responders with the required items, including:

- the facility layout
- properties of hazardous waste handled at the facility and associated hazards
- places where facility personnel would normally be working
- entrances to roads inside the facility
- possible evacuation routes

The event should be documented with an agenda or summary of action items and a sign-in sheet, including the name, title, agency and signature of all attendees. Required information may also be conveyed to each local emergency responder in writing, via telephone or by email. The email(s) and or telephone calls must be documented for future reference.

If the possibility exists that more than one police or fire department could respond to the same incident, the facility should contact each department to determine which has primary authority. The primary department should be recorded in the contingency plan, and communications with each department should be documented. One option is to use ADEQ's communication log template [download Template \(Word\)](#)

If Arrangements Are Declined

In any case where local authorities decline to enter into an agreement with the facility or decline a copy of the contingency plan, the owner or operator must document the refusal. For example, you may ask for a letter in writing or via email to document the refusal, or use the communication log template to document a verbal refusal [download Template \(Word\)](#)

Release, Fire or Explosion:

The emergency coordinator must immediately identify the character, exact source, amount and areal extent of any released material and assess possible hazards to public health or the environment.

For release, fire or explosion that could impact public health or the environment off-site:

- Immediately notify appropriate local authorities if evacuation of local areas is advisable

- Immediately notify the ADEQ Emergency Response Unit (602- 949- 2000 or 800-2 42- 6 6) and the National Response Center (800-424-8802) with the following information:

- name, address, and telephone number of the reporter
 - name and address of the facility
 - Time and type of incident (e.g. release, fire)
 - name and quantity of material(s) involved, to the extent known
 - The extent of injuries, if any
 - The possible hazards to public health, or the environment, outside the facility.
 - Take reasonable steps to ensure fires, explosions and releases do not recur or spread to other hazardous waste at the facility

If the generator stops operations, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment, as appropriate.

Quick Reference Guide:

A quick reference guide of the contingency plan submitted to local emergency responders should include:

1. Types of hazardous waste in simple terms
2. Hazard associated with each waste
 - . Estimated maximum amount of each hazardous waste that may be present at any time
4. Identification of wastes where exposures may require unique special medical treatment
 - . Map of the facility showing where hazardous wastes are generated, accumulated, and treated, and routes for accessing these wastes
6. Street map of the facility with surrounding businesses, schools, and residential areas
 - . Locations of water supply (i.e., fire hydrant) its flow rate
8. Identification of on-site notification systems (i.e., fire alarms systems)
 - . Name of the emergency coordinators and 24-hour emergency telephone number(s)

Together these requirements look like the example on the following page (Page 4)

ABC Facility: 5559 W Southton Rd. Maricopa, Arizona

Emergency Contacts: First name, Last name, (xxx)-xxx-xxxx

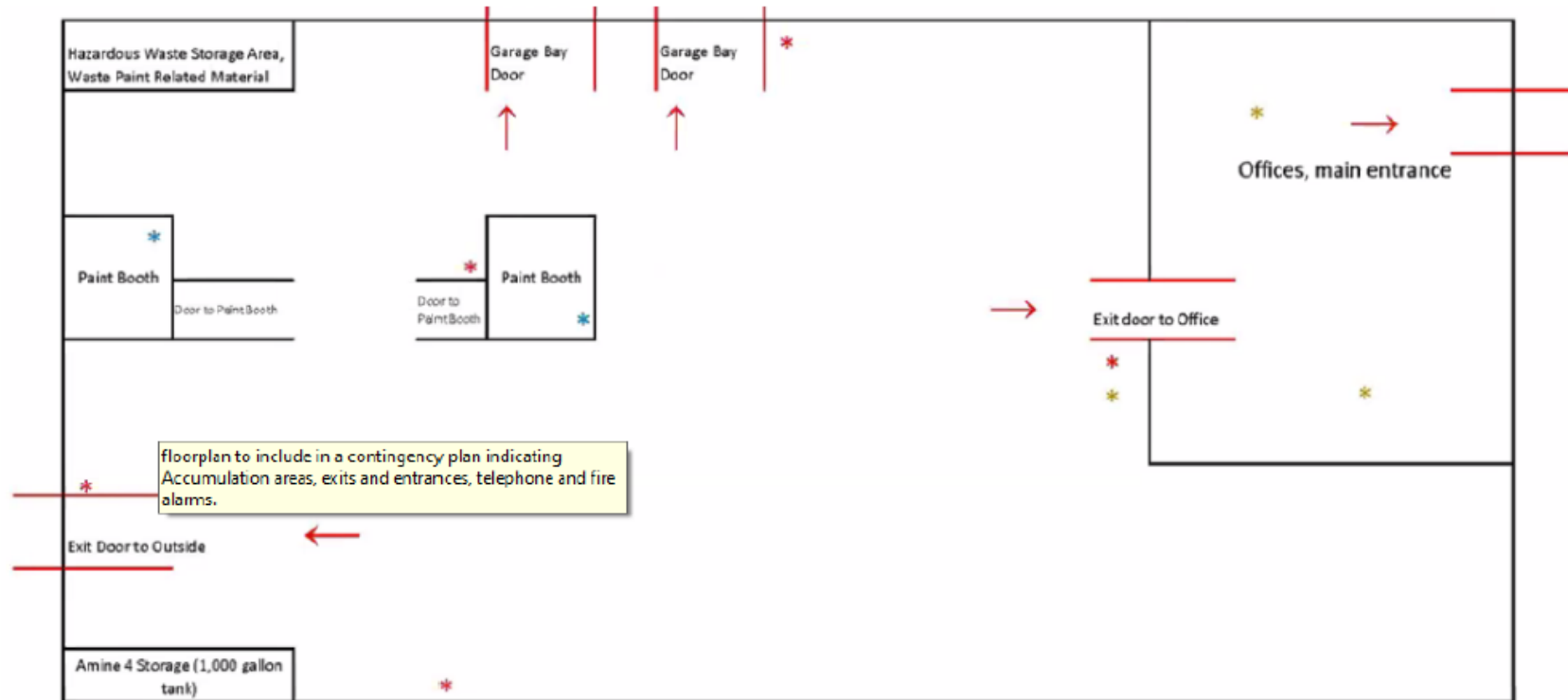
Primary Emergency Coordinator: First name, Last name, (xxx)-xxx-xxxx

Secondary Emergency Coordinator: First name, Last name, (xxx)-xxx-xxxx

Note: If a 24/7 line is used by ABC Facility the contact information must be included

HAZARDOUS WASTE INFORMATION:

Name of Waste	Waste Codes/Hazards	Location Accumulated	Maximum Amounts Present	Response Notes	Special Notes to Hospital/Treatment personnel
Paint Related Wastes (liquid)	D001 (ignitability, flash point <140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity)	NW corner of Warehouse, hazardous waste storage area	Five, 55-gallon drums (2,065 pounds)	If personnel come into direct contact with material, decontamination at the hospital may be required prior to treatment.	None
Paint Related Wastes (liquid)	D001 (ignitability, flash point <140 °F); F003, F005 (Benzene, Methyl Ethyl Ketone, Toluene, Toxicity)	Two Satellite Accumulation Areas as noted with blue asterisks on the attached map.	One, 55-gallon drum (440 pounds)	If personnel come into direct contact with material, Decontamination at the hospital may be required prior to treatment.	None
Off-specification 2, 4-D, an herbicide, (brand name is Amine 4) (liquid)	D016 (toxicity); Flashpoint 190 °F.	SW corner of warehouse near new product storage of Amine 4.	Off-Spec-1 tank, 1,000 gallons New product - 1 tank (same tank as off-Spec), 1,000 gallons	Use PPE to prevent contact with skin and eyes. Immediately prevent spills from entering drains and waterways. Prevent sources of ignition and open flames.	Contact Chemtrac for emergency medical treatment information at 800-424-9300. If in eyes, wash eyes for several minutes.



- * Satellite Accumulation Area for Paint Related Waste Material (D001, F003, F005)
- * Fire Alarms (ring on-site only, there are no fire alarms that notify off-site personnel)
- * Telephone for off-site notification of emergency
- ➔ Indicates evacuation route out of the building.

Note 1: Hazardous waste (paint-related waste) is generated and accumulated inside each of the two paint booths, and is accumulated in the hazardous waste storage area. Amine 4 can be a hazardous waste if it is off-specification. It is generated and accumulated in the SW corner at the Amine 4 tank.

Note 2: Smoke detectors are located throughout the office and main warehouse on the ceiling, in a grid about every 25 feet. Smoke detectors are connected to an automatic sprinkler system.