



CONSIDER PREPARING AN INTEGRATED CONTINGENCY PLAN FOR YOUR FACILITY

WHAT IS THE INTEGRATED CONTINGENCY PLAN GUIDANCE?

In June 1996, the National Response Team (NRT) published the Integrated Contingency Plan (ICP or One Plan) Guidance in the *Federal Register*. This Guidance provides you, the facility owner or operator, with a way to consolidate multiple plans, prepared in compliance with various regulations, into one functional emergency response plan. The NRT developed the ICP Guidance to respond to the recommendations in the December 1993 NRT Report to Congress: *A Review of Federal Authorities for Hazardous Materials Accident Safety*. The NRT received input from representatives from state and local agencies, industry, and environmental groups prior to developing the Guidance.

Five agencies signed the One Plan Guidance: the Environmental Protection Agency (EPA), the Coast Guard in the Department of Transportation (DOT), the Office of Pipeline Safety in DOT, the Occupational Safety and Health Administration (OSHA) in the Department of Labor, and the Minerals Management Service (MMS) in the Department of the Interior. The signatory agencies, responsible for reviewing and approving response plans, accept plans prepared in accordance with the ICP Guidance. The Federal Government considers the One Plan as the preferred method of response planning.

WHICH REGULATIONS DOES THE ICP GUIDANCE COVER?

The ICP document presents a sample contingency plan outline that addresses requirements of the following federal regulations:

- ⇒ The Clean Water Act (CWA) 33 U.S.C 311 s/s 1251 et. seq. (as amended by the Oil Pollution Act [OPA] 33 U.S.C. § 2702-2761) Facility Response Plan Regulations (EPA 40 C.F.R. pt. 112, Coast Guard 33 C.F.R. pt. 154-155, DOT 49 C.F.R. pt. 194, MMS 30 C.F.R. pt. 254);
- ⇒ EPA's Risk Management Program Regulation 40 C.F.R. pt. 68, Oil Pollution Prevention Regulation 40 C.F.R. pt. 112, and the Resource Conservation and Recovery Act (RCRA) Contingency Planning Requirements 40 C.F.R. pt. 264, 265, 279.52; and
- ⇒ OSHA's Emergency Action Plan Regulation 29 C.F.R. pt. 1910.38, Process Safety Management Standards 29 C.F.R. pt. 1919.119, and the Hazardous Waste Operations and Emergency Response (HAZWOPER) Regulation 29 C.F.R. pt. 1910.120.

WHICH FORMAT?

A facility may use the ICP sample format or use an alternate format. The ICP sample format includes the following three sections:

- ⇒ Plan introduction;
- ⇒ A core plan that serves as the primary response tool; and
- ⇒ A series of annexes that provide more detailed supporting information and regulatory compliance documentation.

The ICP sample format is based on the Incident Command System (ICS). Organizing an integrated contingency plan according to the structure of the ICS will allow the plan to dovetail with established response management practices. This approach should promote the usefulness of the plan in an emergency.

CAN I INCLUDE A CROSS-REFERENCE?

The ICP Guidance supports the use of linkages (i.e., references) to facilitate coordination with other facility plans and with external plans such as local emergency planning district plans and OPA Area Contingency Plans. When a facility submits a plan for federal agency review, it must provide a table indicating where the required regulatory elements can be found in the ICP format. **The ICP Guidance includes tables that cross-reference the requirements of individual regulations with the ICP sample format.**

The NRT intends to continue promoting the use of the ICP Guidance by regulated industries and encourages federal and state agencies to rely on the ICP Guidance when developing future regulations.

QUESTIONS?

For questions on the interface of the ICP Guidance with specific regulations, call the contact listed for that particular regulation:

- ⇒ Coast Guard Facility Response Plan Regulation: U.S. Coast Guard Vessel Response Plan Hotline, (202) 267-0434
- ⇒ DOT/Research and Special Programs Administration (RSPA) Pipeline Response Plan Regulation: Jim Taylor, (202) 366-8860
- ⇒ EPA Oil Pollution Prevention Regulation: Spill Prevention, Control, and Countermeasures (SPCC) Information Line at (202) 260-2342
- ⇒ OSHA regulations and standards: Contact either your regional or area OSHA office
- ⇒ MMS Facility Response Plan Regulation: Larry Ake, (703) 787-1567
GOM: Rusty Wright 504-726-2529
PAC: Craig Ogawa 805-389-7569
AK: Christy Bohl 907-271-6082
- ⇒ EPA Risk Management Planning Regulation: William Finan, (202) 564-7981
- ⇒ RCRA Contingency Planning Requirement: Contact the RCRA, Superfund, and Emergency Planning and Community Right-to-Know Act (EPCRA) Hotline at (800) 424-9346 (TDD: (800) 553-7672) or at (703) 412-9810 if you are in the Washington, DC area

FOR MORE INFORMATION...

The ICP Guidance was published in the *Federal Register* on June 5, 1996 (61 FR 28642). For copies and more information, call the RCRA, Superfund, and EPCRA Hotline: (800) 424-9346 (TDD: (800) 553-7672). In the Washington, DC area, call the Hotline at (703) 412-9810.

The ICP Guidance is also available on the publications page of the NRT web site at <http://www.nrt.org>.