THE NATIONAL RESPONSE TEAM’S INTEGRATED CONTINGENCY PLAN ("ONE PLAN") GUIDANCE
What is the Integrated Contingency Plan (ICP) Guidance?

- The ICP, or “One Plan” guidance, is a resource for use in consolidating, into one functional plan, multiple emergency response plans for releases of oil and nonradiological hazardous substances.
Where You Can Find the ICP Guidance Notice

- Published as a notice in the *Federal Register* at 61 FR 28642, June 5, 1996.

Facility Emergency Response Plans: The Problem

- The Problem
  - Different agencies regulate the same facilities and substances.
  - Federal requirements are multiple and overlapping.
  - Plan elements are duplicative.
Facility Emergency Response Plans: The Solution

- One functional emergency response plan is better than multiple plans that may be difficult to use in a true emergency.
- The ICP guidance resulted from recommendations in a December 1993 NRT Report to Congress.
- In developing the guidance, the NRT received ideas and comments from state and local agencies, industry, and environmental groups.
What the ICP Guidance Should Do

- Reduce administrative costs.
- Simplify training for operators and management.
- Permit consolidation of response drills.
- Save time on in-house plan reviews.
- Improve coordination of response activity.
- Assist in developing area contingency plans.
- Organize material required by regulations.
- Improve protection of the public health, workers’ safety, and the environment.
Some Benefits of Following the ICP Guidance

- Offers the opportunity to add content and modify the format.
- Offers the opportunity to “incorporate by reference.”
- Offers the opportunity to coordinate plans with ACPs, LEPC plans, mutual aid plans, etc.
- Provides a good planning template.
What the ICP Guidance Won’t Do

• The ICP guidance:
  ⇒ Does not change existing requirements.
  ⇒ Does not eliminate applicable agency review.
Which Federal Agencies Endorsed the Guidance

- Five agencies endorsed the ICP guidance:
  - EPA
  - USCG
  - DOL/OSHA
  - DOT/OPS
  - DOI/MMS
ICP Is an Accepted and Preferred Format

- Federal agencies agree that they will accept emergency response plans in ICP format.

- Federal agencies agree that integrated planning is the federally preferred method of response planning.
What You Should Know About the ICP

• The ICP Guidance presents an outline to address emergency response elements of the following nine federal regulations:
  ⇒ EPA’s SPCC and FRP Regulation
  ⇒ MMS’s FRP Regulation
  ⇒ RSPA’s Pipeline Response Plan Regulation
  ⇒ USCG’s FRP Regulation
  ⇒ EPA’s Risk Management Programs Regulation
  ⇒ OSHA’s Emergency Action Plan Regulation
  ⇒ OSHA’s Process Safety Management Standard
  ⇒ OSHA’s HAZWOPER Regulation
  ⇒ EPA’s RCRA Contingency Planning Requirements
About the ICP Format

• Introductory Section

• Core Plan
  ⇒ Serves as the primary response tool.

• Annexes
  ⇒ Provide more detailed supporting information and regulatory compliance documentation.
About the ICP Format (Cont.)

- NIIMS ICS Structure
  - The structure of the sample core plan and annexes is based on the structure of the NIIMS ICS, which is consistent with the NRT ICS/UC Technical Assistance Document.
  - NIIMS ICS is a response management system that provides a framework to improve coordination among response personnel.
  - Organizing the ICP according to NIIMS ICS will facilitate use of the plan in an emergency.
The ICP Format: Introductory Section

- Provides basic information about the plan and the facility to facility response personnel, outside responders, and regulatory officials.

- Includes:
  - Statement of purpose and scope
  - Table of contents
  - Information on the current revision date of the plan
  - General information on the facility
  - Key contact(s) for plan development and maintenance
The ICP Format: Core Plan

- Should reflect the steps necessary to initiate, conduct, and terminate an emergency response.
- Should be concise and easy to follow, particularly during an emergency.
- Should include:
  - Discovery
  - Twenty-four-hour activation contact
  - Initial response
  - Sustained actions
  - Termination and follow-up actions
The ICP Format: Annexes

- Should relate to basic headings of the core plan and supplement the core plan by:
  - Providing key supporting information for conducting an emergency response; and
  - Documenting compliance with regulations not addressed elsewhere in the ICP.
The ICP Format: Annexes (Cont.)

- Annexes 1 through 8
  - Facility and locality information
  - Notification
  - Response management system
  - Incident documentation
  - Training and exercises/drills
  - Response critique, plan review, and modification process
  - Prevention
  - Regulatory compliance and cross-reference matrices
Purpose of Cross-References

- Providing a cross-reference is required as a part of an ICP.
- Cross-referencing enables the plan holder to do QA/QC before submitting the plan for review.
- Cross-referencing among regulatory program elements helps plan reviewers verify compliance with applicable requirements.
Developing a Cross-Reference Matrix

- The matrices at the end of the guidance are to be used for developing cross-references to various requirements.
- Matrices can also help planners consolidate various plans and document compliance with federal regulations.
What About ICPs and State/Local Requirements?

- States also may have emergency response planning requirements not covered in this guidance.
- The guidance encourages each facility to coordinate development of its ICP with appropriate state and local agencies.
- States are encouraged to accept plans prepared in this integrated format.
  ⇒ Some states have already begun developing ICP initiatives.
Examples of ICPs

- Federal
  - Status of the Department of Navy One Plan
  - State initiatives
  - Findings from report, *Integrated Contingency Planning: A Mechanism for Consolidating Multiple Requirements*

- Private sector
  - Voluntary efforts
  - Facility ICP examples
ICP Outreach Materials

- Integrated Contingency Plans Brochure available on the CEPPO Website.
Important Things to Remember About ICP

- Using the ICP format should facilitate emergency response.
- The ICP guidance should simplify the process of complying with federal regulations for facility contingency response planning.
- The ICP document is guidance, not a regulation; facilities are free to maintain multiple plans.
- Using the ICP format can save time and money.