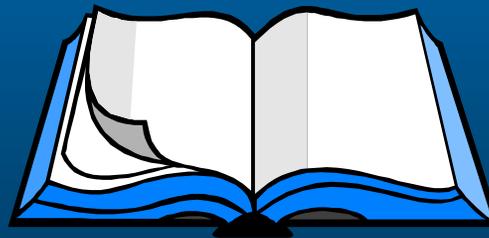


# **THE NATIONAL RESPONSE TEAM'S INTEGRATED CONTINGENCY PLAN ("ONE PLAN") GUIDANCE**



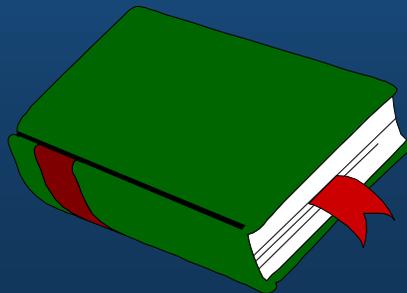
# What is the Integrated Contingency Plan (ICP) Guidance?

- 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.



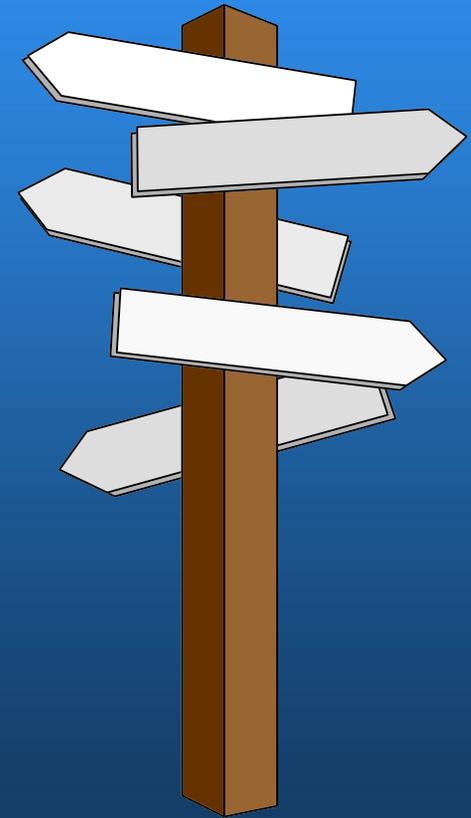
# Where You Can Find the ICP Guidance Notice

- Published as a notice in the *Federal Register* at 61 FR 28642, June 5, 1996.
- Available on the NRT Website at <http://www.nrt.org> and on EPA's Chemical Emergency Preparedness and Prevention Office Website at <http://www.epa.gov/swercepp/pubs/one-plan.html>.



# 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

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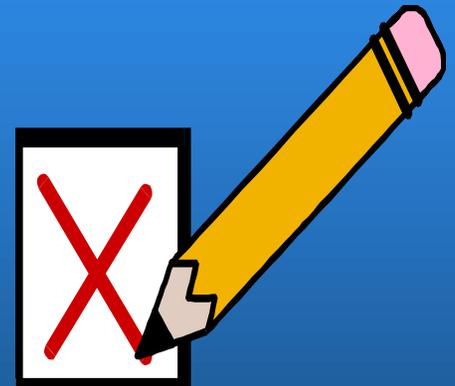
- Offers the opportunity to add content and modify the format.
- Offers the opportunity to “incorporate by reference.”
- Offers the opportunity to coordinate plans with ACPs, LEPC plans, mutual aid plans, etc.
- Provides a good planning template.

# 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



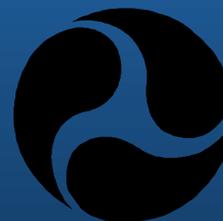
⇒ DOL/OSHA



⇒ 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.

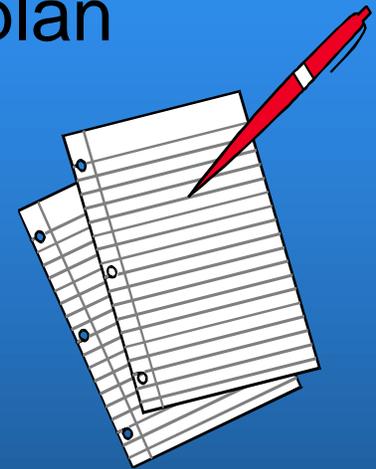


# About the ICP Format (Cont.)

- 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



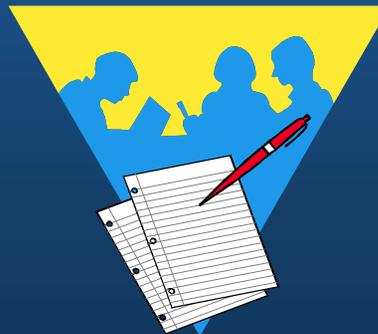
# The ICP Format: Core Plan

- 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.)

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- 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

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- 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.

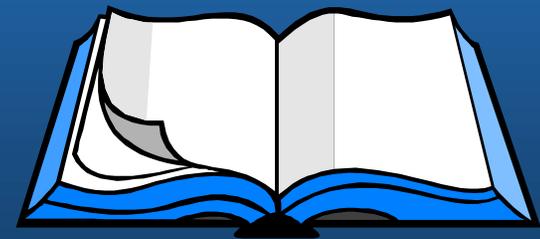
# What About ICPs and State/Local Requirements?

- 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

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- Integrated Contingency Plan (“One Plan”) Guidance Factsheet available on the CEPPO Website at <http://www.epa.gov/swercepp> or the NRT Website at <http://www.nrt.org>.
- 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.

