

Emergency Response Plan Coordination with Responders

The February 15th amendment to NAC 459.9544 and 459.95442 clarifies the steps that are required to consider the emergency action plan or emergency response plan to be coordinated with the local responders.

For facilities that WILL NOT respond to a HAZMAT incident (NAC 459.9544(2)(c))

For response actions to be coordinated, the owner or operator shall:

- (1) Identify the first responding fire station and hazardous materials response station;*
- (2) Review the written emergency action plan and appropriate mechanisms for notification developed for the facility with the responders identified in subparagraph (1) or their representatives;*
- (3) Keep a written record of such review meetings, including comments by the responders or their representatives to the written emergency action plan and appropriate mechanisms for notification of the responders; and*
- (4) Update information on a basis agreeable to the owner or operator and the responders*

For facilities THAT WILL respond to a HAZMAT incident (NAC 459.95442(1)(b))

For response actions to be coordinated, the owner or operator shall:

- (1) Identify the first responding fire station and hazardous materials response station;*
- (2) Review the emergency response program developed for the facility with the responders identified in subparagraph (1) or their representatives;*
- (3) Keep a written record of such review meetings, including comments by the responders or their representatives to the emergency response program for the facility; and*
- (4) Update information on a basis agreeable to the owner or operator and the responder.*

Regarding the plan review:

1. The plan must be reviewed with the responder (1st responder & HAZMAT responder) over one or more meetings.
2. An Emergency Action Plan deals primarily with emergency recognition, notification and evacuation. As this plan is relatively simple, the review meeting will likely be relatively simple. The following should be covered at a minimum:
 - a. The hazardous materials on site;
 - b. The various anticipated scenarios initiating implementation of the plan (fire, explosion, toxic gas leak, medical emergency, etc.)
 - c. Plant alarm systems; what they indicate, who they notify, under what circumstances.
 - d. How the responders are notified and under what circumstances.
 - e. How facility personnel interact with responders during an emergency.
 - f. Responsibilities that the facility would expect the responder to assume.
3. In addition to emergency recognition, notification and evacuation, an Emergency Response Program deals with offensive action taken by the facility to various emergencies. This review will cover the facility's HAZMAT capabilities. The following should be covered at a minimum:
 - a. The hazardous materials on site;
 - b. The various anticipated scenarios initiating implementation of the plan (fire, explosion, toxic gas leak, medical emergency, etc.)
 - c. Plant alarm systems; what they indicate, who they notify, under what circumstances.
 - d. How the responders are notified and under what circumstances.
 - e. How hazardous materials response is handled by the facility and how response activities are integrated with the local responder capability and incident command structure.
 - f. Responsibilities that the facility would expect the responder to assume.
4. Records of the meeting(s) must be kept and made available to NDEP for review upon request.
5. Plan updates must be provided on a mutually agreeable timetable and review format.