

# THE OHIO STATE EMERGENCY RESPONSE COMMISSION (SERC)



## OHIO HAZARDOUS MATERIALS PLAN DEVELOPMENT AND EVALUATION DOCUMENT

The Hazardous Materials Plan Development and Evaluation Document (hereafter called the “document”) consist of two sections. Section 1 will explain the documents use and functions associated with developing, reviewing, and/or updating the LEPC's Chemical Emergency Response and Preparedness Plan. Section 2 of the document will be referenced as the “crosswalk” and will act as a review document for the LEPC's Chemical Emergency Response and Preparedness Plan.

**It is important to review Section 1 prior to completing Section 2.**

## **Section 1**

### **A. Introduction:**

Ohio Revised Code (ORC) Section 3750.04, requires each LEPC in Ohio to have a chemical emergency response and preparedness plan. Paragraph (A), of the section, defines twelve requirements that every LEPC plan shall contain and a thirteenth requirement which allows the State Emergency Response Commission (SERC) to add planning requirements, by rule, that will improve local response and preparedness. This document was adopted by SERC as an additional planning requirement in that the “SHALLS” of this document must be met.

Ohio Administrative Code (OAC) 3750-20-74, requires the SERC to provide a document to LEPC’s as guidance for the development of their plans. It also states that this document shall be used by the SERC’s designated agency, the Ohio Emergency Management Agency (Ohio EMA), to review LEPC plans. However, Ohio EMA only reviews the plans and provides recommendations to the SERC. The ultimate decision to concur with a plan rest with the SERC. The plan is to be submitted to Ohio EMA by the 17th of October each year.

The information found in the document was obtained from a variety of sources regarding planning. The main source was the “Hazardous Materials Emergency Planning Guide”, also known as NRT-1, which was developed by the National Response Team (NRT) to assist local communities prepare for hazardous materials incidents. Attention should be given to NRT-1 Appendix D which states: “These criteria may be used for assessing the emergency plan as well as the emergency preparedness program in general. **It must be recognized, however, that few state or local governments will have the need or capability to address all these issues and meet all these criteria to the fullest extent.**” Current reference to NRT-1 can be found on the United States Environmental Protection Agencies website.

The emphasis of this document and the law is of course centered on planning for releases of Extremely Hazardous Substances (EHSs) at fixed facilities. The term “facility” used in the “crosswalk” is a facility that would be subject to the plan. Planning for other hazardous materials or sources of a release is at the discretion of the LEPC, as the requirement is for EHS’s above the Threshold Planning Quantity (TPQ). If the community feels those hazards should be planned for, they should be addressed by their plan.

## B. Explanation of Terms and Symbols:

The document's outline is organized to provide a simple flow of information. Items are first discussed as to why the plan is developed, and then proceeds on to discuss what hazards are faced by a community. Next, the outline discusses how the community will respond and recover from an incident. Then, ultimately, the outline covers how the plan is maintained.

The actual working document, also called the "crosswalk", shows the information in three distinct sections. These are References, Planning Criteria, and Section/Page #. The sections are labeled across the top of the table and refer to the information that is provided beneath each title. The intent of these titles and their respective sections are explained as follows:

1. References: This heading is shown as a column along the left side of the table. This column explains the source from which the Planning Criteria information was taken. The source will be either from the ORC, OAC, or NRT-1. These references are provided so that a person using the "crosswalk" can see which source required or recommended the information to be in the plan. The reference gives the user an indication on where to read more about a specific Planning Criteria. The reference sources, are described below.
  - a. ORC/OAC: This references a specific planning requirement under Ohio Revised Code 3750.04(A) or Ohio Administrative Code 3750-20-74. It will be shown as "ORC" or "OAC" and a number in parentheses. Both will be in **bold print**. For ORC, the number indicates the specific planning requirement found in Paragraph .04(A). The **bold print** indicates that the information **SHALL** be addressed in the plan. In some cases, more than one number will appear in the parentheses. This indicates that more than one planning requirement is being addressed by that Planning Criteria. Also, every **SHALL** in the "crosswalk" **MUST** have an associated section in the ORC/OAC that relates in some way to the planning criteria.
  - b. NRT-1: This references the NRT-1's Chapter discussions on the critical planning elements plans should address. The reference is shown as "NRT-1" and a number. The number represents the page number(s) where the planning information is discussed in the NRT-1 (2001 Version).
2. Planning Criteria: This heading is shown as a column in the middle of the table. It identifies the planning criteria which is either required or recommended to be in the plan. The criteria are displayed in a working table. The table follows a Roman numeral format and is used to illustrate and present the criteria in a logical sequence. A series of statements and symbols designate which information is required versus recommended. The statements and symbols are explained as follows:
  - a. "The Plan SHALL": The statement means that the following information is **required to be addressed via the below bullet(s)** due to an ORC/OAC requirement. A corresponding ORC/OAC reference will appear in the Reference column next to the planning criteria. This identifies the specific legal requirement which needs to be addressed. This portion is not the requirement, the section below with the "☒" symbol is the requirement that actually fulfills this main statement.

- b. “The Plan Should”: The statement means that the following information is recommended to be addressed. The information is considered to be essential to make a more effective and comprehensive plan, and thus should be addressed.
  - c. The symbol “□”: This indicates the block of information that will be addressed for that title. A block of information is the relevant information that in a broad sense is to be developed by the LEPC and which will be reviewed by the SERC. For SHALLS, this block is not the requirement. The requirement is delineated by the “⊗” symbol in the section below.
  - d. The symbol “⊗”: This bullet statement follows SHALL blocks of information. These bullets clarify what information is **required and shall be included** to adequately address the given top statement block of information. The SERC will review the block of information based on information developed for each bullet under the block.
  - e. The symbol “○”: This bullet statement may follow any given block of information. These bullets are recommendations to be discussed. These bullets, if addressed, would expand upon the use and effectiveness of the required information and/or the plan itself.
3. Section/Page #: This heading is shown as a column along the right side of the table. It provides a section to identify where the planning criteria to the left is located in your plan. A single blank box is provided to define exactly what section and/or page number the information is found. Since no two plans follow the same format, this section allows a plan user to readily locate required and recommended planning criteria without having to search the entire plan. Additionally, by completing this document through notation, the LEPC can use this to meet the requirements in the OAC for a Table of Contents which lists locations required by ORC 3750.04.

Lastly, the “crosswalk” uses a variety of action verbs to indicate how a specific requirement should be addressed. Four action verbs are routinely used and are defined below.

It should be noted that detailed information required by four action verbs can also be referenced to a SOP, SOG, or other plan provided it is notated to be found in a different location (i.e. Table of Contents, crosswalk, or brief summarization). For “SHALL” requirements, a brief description may be inserted into the plan that describes how the SOP, SOG, or another plan meets that requirement. However, if this description will be too onerous the LEPC may submit the document for review or the reviewer may view the documents in the field.

1. Describe: To describe something implies a detailed account of the subject. The amount of detail is dependent on the writer so that the intended reader can clearly visualize or understand the subject.

For example, Buckeye Chemical submitted a Tier II filing for sulfuric acid at the facility. The facility is located in an industrial area with other facilities nearby along with a river and major highways. The sulfuric acid is in a building at the facility in 55-gallon drums which have identifying markings.

2. Explain: An explanation can be much like a description but with more specific details. It's intent to provide a more precise description of a subject.

For example, Buckeye Chemical, 123 Cardinal Lane Scarlet City, submitted a Tier II filing for sulfuric acid at the facility. The facility is located in the Myer Industrial Park. Bobcat Chemical, Flyer Fuel, and Falcon Industries are located within .5 miles of the facility. The Bearcat River creates the southern border of the facility with State Route 22 and 333 acting as the main access roads. The sulfuric acid is located in building one (1) at the facility in 55-gallon drums which area labeled with UN number 1830.

3. Identify: This implies a short, but descriptive, wording of what the subject is.

For example, Buckeye Chemical, 123 Cardinal Lane Scarlet City, submitted a Tier II filing for sulfuric acid at the facility. The sulfuric acid is located in building one (1) at the facility in 55-gallon drums.

4. Summarize: This is much like a description and is shorter than an explanation. This gives the reader a brief look at the subject, enough to formulate an image but not to clearly visualize the subject.

For example, Buckeye Chemical submitted a Tier II filing for sulfuric acid at the facility. The facility is located in the Myer Industrial Park near the Bearcat River, State Route 22, and State Route 333. The sulfuric acid is located in building one (1) at the facility in 55-gallon drums.

The above action verbs are used in the title blocks and bullets of information. They should lead the plan writer in a direction that best addresses the topic or bullet. The level of detail provided for each topic will be determined by the LEPC. As the NRT-1 states, "...each community should seek to develop a plan that is best suited to its own circumstances"

### **C. How to Use the Document:**

The plan is a fluid document. The basic purpose of the plan is to provide or direct to the source the necessary data and documentation to identify and coordinate the many persons and procedures involved in a chemical emergency response. The SERC expects the primary use of this document to be used in the evaluation of the LEPC's plan not only by the SERC as required by the OAC, but also be used by the LEPC. Every emergency plan must be evaluated to keep it up-to-date with a community's varied abilities to respond to a chemical emergency. Plan updates are completed by critiquing actual incidents, evaluating simulated exercises, conducting department and individual personnel training, and reviewing changing procedures and collected data.

1. How to Use in Planning: The Document assists in writing either a new plan or in modifying an existing plan. Before using this Document, the SERC or LEPC should review NRT-1's discussion on the steps involved in the planning process (see Chapter 2 - Selecting and Organizing the Planning Team).

To begin the planning process, the LEPC should first review the thirteen planning requirements identified in ORC 3750.04 and elements in OAC 3750-20-74. The LEPC should gather other plans,

SOPs, and SOGs that relate to the requirements. Next, based on the available information, prioritize which planning requirements to be developed and in what order. As this is done, review the “crosswalk” to find the related reference(s) to the planning requirement that is to be developed. Review each **SHALL** block of information, ☐, and the respective bullets, ☒, that apply. The LEPC can now compare the information they have gathered versus what has been asked for in the **SHALL** bullet statements. Now, the planning team can develop the information to be in their plan or cite where in other plans, SOPs, or SOGs the information is located.

As information is cited or developed and completed, the planning team should ensure that each bullet for a given block of information is addressed and all SHALLs are addressed. When each SHALL bullet, ☒, is addressed, the block, ☐, itself may be checked off as being completed. This should be continued until the entire plan is completed, and each block is checked off. Once the plan is completed, the plan team should return to the beginning of the “crosswalk”. The LEPC needs to identify where each block of information can be found in the plan or exactly where cited. This is done by writing the specific plan page, section and/or other document citing on the box under the Section/Page # heading, or notation in the plan. LEPCs may also hyperlink a bookmark or page number from the plan into the provided box (be sure to save both the plan and crosswalk in the same folder before making those bookmarks and saving the documents for sharing). If using this electronic format LEPCs must have descriptive links to ensure the location of information can be found either by the bookmark or by hand. If more than one page or section is used to address a particular block, then note those in the box provided. If the citations are too numerous to list, then one citation should be noted where the majority of information is addressed. Again, the process ensures all 13 planning requirements are met and can be substituted for a Table of Contents with the 13 planning requirements identified.

The level of detail used to address each block of information is based on the needs of the community. One community with few procedures or trained personnel may need a plan that has detailed descriptions of procedures and response techniques. Meanwhile, other communities that have well-defined programs and prepared personnel may only need the plan to explain how all of their procedures are coordinated during a response. In the course of the document, it will be annotated via the word “NOTES” where the author(s) feels the application in an SOP or other information may truly be warranted. If the LEPC wishes to address the “SHALLS” in this manner, they may also wish to cite the source when completing the “crosswalk”. Others may use a combination of these techniques. But in no case should a plan be considered a “hip-pocket” emergency manual or a single standard operating procedure (SOP). In fact, the plan may be a starting point to develop specific SOPs.

Please note that, the outline used in the Section 2 of this document is not meant to dictate or require the LEPC to follow a particular style (i.e. ESF, Annex format, or other). The LEPC must use a format, an outline, or plan structure that best suits their community’s needs. This Document is only meant to identify those required and/or recommended elements each planning community shall and/or should address. Additionally, it should be noted the LEPC does not have the authority to dictate procedures to external agencies. Instead, the LEPC should work with partners through preparedness, planning, education, and training for improved capabilities and responses for all community members.

2. Evaluation Use: Once the plan is developed, it is ready for an objective and critical review. Plan review and approval is a critically important function of the LEPC and even more of a concern by

the SERC. In OAC 3750-20-74 (A)(4) states that Ohio EMA as the plan reviewer will utilize this Document in verifying the plan's completeness. ORC 3750.04(C) requires that each LEPC shall review the plan at least annually, or as often as changes occur in the community. In fact, not only the planning team, but also individual departments, and plan holders must review the plan. The LEPC should have a defined procedure on how and when to review the plan. Before using this document, the LEPC must read NRT-1's discussion on the steps involved in evaluating the plan (see Chapter 6 - Plan Appraisal and Continuing Planning) to understand the background for the development of the SHALLS in this document.

The review process will identify those topics which are missing information and/or need additional information. The Document will assist in identifying specific areas or topics. Here are two techniques you can utilize when reviewing the plan.

The first technique is that a reviewer can begin by reading the plan with a blank "crosswalk". As the plan is read, the reviewer would identify what block of information in the "crosswalk" the plan is addressing. The reviewer would then place the plan's section and/or page number onto the line in the "crosswalk" next to the appropriate block of information. The reviewer can then determine whether or not the plan adequately addresses the required information. The reviewer can also determine what recommended information should be added to enhance the plan's use and functionality. A comment box is provided below each block of information for the reviewer to document information about the plan. The reviewer can make comments on what changes, additions or deletions should be made in the plan regarding the given block of information. This process should be continued for the entire plan. When the review is complete, it should be shared with the LEPC. Changes can now be discussed and made as needed.

The next technique utilizes a partially-completed or complete "crosswalk". This is a document where the information under the Section/Page # column has already been documented by the planning team. To complete a review, a person would obtain a copy of the "crosswalk" and start reading it. As they read each block of information, they would then locate it in the plan where the corresponding material is addressed. The reviewer can then determine whether recommended information is adequately addressed or should be amended to enhance the plan's use and functionality. As stated above, they would make appropriate comments in the comment box below the given block of information. When complete, the reviewer would share his/her findings with the LEPC.

Either technique should generate feedback from the reviewer to the LEPC that is both positive and negative. The LEPC as a group or an assigned sub-committee of the LEPC can determine how and where to revise and update the plan.

The review process can even be used as a training tool by the LEPC or an individual department. When the review is completed by actual plan holders, the review process can act as a training program to familiarize personnel with the use and applicability of the plan. The more involvement each person and/or plan holder has in keeping the plan up-to-date, the more they will stay up-to-date with the plan. If the LEPC does the plan review as a group, the results can in turn be shared with individual departments by the various LEPC representatives to insure each plan holder understands the purpose of the change or update.

#### **D. Submission of the Plan/Changes for the Formal Review**

The ORC states that LEPC Plans must be submitted to the SERC (OEMA) for Annual Review ***not later than October 17th*** of each year. When submitting the Plan for a formal review the LEPC must submit the following:

1. A letter or email explaining that the information enclosed, (i.e., new Plan, or Plan updates), is being submitted for the purpose of the formal review. (The Ohio Hazardous Materials Planning and Exercise Guidance Booklet page 1-13 Sample Letter).
2. A copy of the LEPC's resolution, or other documentation, signed by the Chairperson, indicating that a majority of the LEPC members have read the Plan and/or Plan updates and agrees with the Plan and/or the Plan updates. OEMA will not review a Plan without evidence that the Committee has reviewed the Plan, or Plan changes.
3. Applicable Portions of the Plan to Submit:
  - a. The entire Plan must be submitted for review when the Plan has been completely rewritten. If the Plan is an Annex or Appendix to the County EOP, a copy of the EOP must also be submitted if the EOP was updated, or completely re-written, since the last formal review.
  - b. If the Plan is not an entirely new Plan, only the changes to the Plan need be submitted for the formal review. (See page 1-13- Sample LEPC Letter Requesting Review of the Plan).
  - c. The Crosswalk must be completed and submitted with the request for review. This would address the requirements under ORC 3750.04 13(a) & (b).

Because the crosswalk is a requirement of the Ohio Hazardous Materials Plan Development and Evaluation Document and Ohio uses the requirements in this document as part of its review, the "crosswalk" needs to be included in the plan prepared by a LEPC and submitted to Ohio EMA for its review, as set forth under OAC 3750-20-72 and 3750-20-74. It is up to each LEPC to determine how it will be included in the plan for submission. The "crosswalk" express what information is to be addressed by plans or Standard Operating Procedures/Guidelines (SOP/SOG).

#### **E. Conclusions:**

This document should help the LEPC to either write a new plan, update an old plan, make corrections to an existing plan, or help to educate plan holders on the plan's contents. The recommended course of action is to fill out the "crosswalk" and incorporate into the beginning of the plan either near the Table of Contents or serve as the TOC.

As a reminder, plans and procedures are fluid and are routinely evolving documents. Therefore, this Document may also change when and if circumstances dictate. Comments on how to improve or how to better utilize this document are always welcome and encouraged from any LEPC member or plan holder. Comments in writing, person, or phone should be directed to either the SERC Operations and Issues Committee or Ohio EMA Regional Operations Staff.



## Section 2

### Hazardous Materials Annex Crosswalk

County: \_\_\_\_\_ Date: \_\_\_\_\_

REFERENCES #	PLANNING CRITERIA	SECTION / PAGE
<b>OAC 3750-20-74</b>  NRT-1, 44	Table of Contents The Plan <b>SHALL</b> :	
	<input type="checkbox"/> List all elements of the plan and identify the locations of each planning requirement under ORC 3750.04(A).	
	<input checked="" type="checkbox"/> Identify sections and page numbers with the location of the 13 planning requirements. An alternative is a completed "crosswalk" in the beginning of the plan.	
	Comments:	
	<b>I. <u>INTRODUCTION</u></b>	
REFERENCES #	PLANNING CRITERIA	SECTION / PAGE
NRT-1, 45-47	A. <u>Plan's Purpose</u> The Plan Should:	
	<input type="checkbox"/> Describe why the plan was developed and how it is meant to be used.	
	<input type="radio"/> Explain who has the authority to activate this plan.	
	<input type="radio"/> Describe why the plan was developed.	
	<input type="radio"/> Describe how the plan was meant to be used.	
	Comments:	
<b>ORC 3750.04 (A)(7)</b>  NRT-1, 44-45	B. <u>Plan Basis</u> The Plan <b>SHALL</b> :	
	<input type="checkbox"/> Identify/Explain the assumptions made and the methods used to complete the Hazards Analyses for EHS Facilities within the district.	
	<input checked="" type="checkbox"/> Identify what methods were used to complete the analyses (i.e., <u>Technical Guidance for Hazard Analysis</u> manual, computer software modeling (CAMEO Suite/ARC GIS), etc.).	
	<input checked="" type="checkbox"/> Describe the geographic assumptions (rural, urban, etc.) made when completing the analyses.	
	<input checked="" type="checkbox"/> Describe the assumptions made about a material's quantity (use of avg amts, max amts, actual amts, etc.) and its storage condition (one container, multiple containers, etc.).	
	<input checked="" type="checkbox"/> Describe the weather factors (winds, temperatures, etc.) assumed while completing the analyses (i.e., defaults given in CAMEO Screening Scenario).	

	<ul style="list-style-type: none"><li>○ Explain how the Facilities were involved in the process (reviewed the analyses, participated in completing the analyses, etc.).</li></ul>	
	Comments:	
ORC 3750.04 (B)  NRT-1, 47	C. <u>Relationship to Other Plans</u> The Plan <b>SHALL</b> :	
	<input type="checkbox"/> Identify other plans in the district and describe how they would be used in conjunction with this plan (i.e., Hospital plans, EOPs, Facility plans, etc.).	
	<input checked="" type="checkbox"/> Describe how this plan is coordinated with the plans of adjoining districts.	
	<ul style="list-style-type: none"><li>○ Identify/Describe what other plans will be employed and how they will be coordinated when the plans are simultaneously put into action.</li></ul>	
	<ul style="list-style-type: none"><li>○ Summarize how Facility plans developed under OSHA are integrated with this plan.</li></ul>	
	Comments:	
II. <u>SITUATIONS AND ASSUMPTIONS</u>		
REFERENCES #	PLANNING CRITERIA	SECTION / PAGE
ORC 3750.04 (A)(1,2,5,7)  NRT-1, 44-45	A. <u>Situations</u>	
	1. <u>Fixed Facility Hazards</u> The Plan <b>SHALL</b> :	
	<input type="checkbox"/> Summarize/Identify a brief account of the district’s fixed facility hazardous materials risk sites.	
	<input checked="" type="checkbox"/> Identify the EHS Facilities within the district. A Geographic Information System (GIS) with this information can meet this requirement.	
	<input checked="" type="checkbox"/> Identify all adjoining Facilities that either may be at risk or adds risk due to their proximity to an EHS Facility within the district. GIS with this information can meet this requirement. The analysis must be identified in GIS, not just the ability to do an analysis.	
	<input checked="" type="checkbox"/> Summarize the geographic area (sewers, streams, watersheds, city, farmland, residential, etc.) and the population likely to be affected (approximate numbers of homes, people, special facilities, types/numbers of properties, etc.) to be affected by a release from an EHS Facility within the district. GIS with this information can meet this requirement.	
	<ul style="list-style-type: none"><li>○ Identify those Non-EHS Facilities that have hazardous materials which pose a risk to the district.</li></ul>	
	<ul style="list-style-type: none"><li>○ Summarize the risks posed by the Non-EHS Facilities should a release occur at their sites</li></ul>	
	<ul style="list-style-type: none"><li>○ Describe the geographical areas and populations around those Non-EHS sites that may pose a risk to the district.</li></ul>	
	<ul style="list-style-type: none"><li>○ Describe the past spill history from Facilities (EHS and Non-EHS) within the district.</li></ul>	

	Comments:	
	<p><u>NOTE:</u> The information to be presented in this Section can be presented as a Tab to the plan. Refer to Tab A of this “crosswalk” for more information on utilizing this option. A more specific option to meet the SHALL is located in section VII TAB A. If the Tab is used, it must meet the above requirements.</p>	
	<p><u>NOTE:</u> LEPCs will submit a “Hazard Analysis” with the plan. The submission can be in a digital format as the size of the documents can be substantial.</p>	
<p><b>ORC 3750.04 (A)(3)</b></p> <p>NRT-1, 44</p>	2. <u>Transportation Hazards</u> The Plan <b>SHALL:</b>	
	<input type="checkbox"/> Identify the district's EHS transportation risks.	
	<input checked="" type="checkbox"/> Identify the routes likely to be used to transport EHSs to and from each EHS Facility. GIS with this information can meet this requirement.	
	<ul style="list-style-type: none"> <li>Describe the types of transportation risks that exist (i.e., major roads/intersections, rail lines/yards/intersections, pipelines/stations, waterways/ports, etc.).</li> </ul>	
	<ul style="list-style-type: none"> <li>Summarize the risks posed by these hazards should a release occur.</li> </ul>	
	<ul style="list-style-type: none"> <li>Explain the geographical and population features near these hazards should a release occur.</li> </ul>	
	<ul style="list-style-type: none"> <li>Describe the past spill history regarding these transportation hazards.</li> </ul>	
	Comments:	
	<p><u>NOTE:</u> The identification of EHS routes to be presented in this Section can be presented as part of a Tab used to summarize the EHS Facility Hazard Analyses. Refer to Tab A of this “crosswalk” for more information on utilizing this option. A more specific option to meet the SHALL is located in section VII TAB A. If a Tab is used, it must meet the above requirements.</p>	
	<p><u>NOTE:</u> Discussions of specific transportation hazards, and the risks posed by them could be summarized as a Tab to the plan. The Tab would identify the specific hazards and their risks as would be done for a Fixed Facility. If this method is used, this section should indicate that a Tab exists covering this information.</p>	
NRT-1, 44	B. <u>Assumptions</u> The Plan Should:	
	<input type="checkbox"/> Describe/Summarize those assumptions concerning what would happen in the case of an accidental spill or release.	
	<ul style="list-style-type: none"> <li>Describe the time variables that may influence response capabilities (rush hours, annual festivals, seasonal events, etc.).</li> </ul>	
	<ul style="list-style-type: none"> <li>Describe the weather factors that may affect release scenarios</li> </ul>	
	<ul style="list-style-type: none"> <li>Describe the demographic features that impact response situations (i.e., population densities, special population centers, etc.).</li> </ul>	

	<ul style="list-style-type: none"> <li>Summarize the district's capability or limits to respond and control a release.</li> </ul>	
	Comments:	
<b>III. CONCEPT OF OPERATIONS</b>		
<b>REFERENCES #</b>	<b>PLANNING CRITERIA</b>	<b>SECTION / PAGE</b>
	A. <u>Mitigation Activities</u> The Plan Should:	
	<input type="checkbox"/> Describe/Summarize those activities taken by the district to lessen the likelihood of an EHS release from occurring (i.e., assigned traffic routes, zoning laws, facility visits/inspections, lowered chemical quantities, engineering/safety changes).	
	Comments:	
<b>ORC 3750.04 (A)(10)</b>  NRT-1, 46  NRT-1A, 11	B. <u>Preparedness Activities</u>	
	1. <u>Mutual Aid Plan</u> The Plan <b>SHALL</b> :	
	<input type="checkbox"/> Identify/Describe the system for providing Mutual Aid to other districts and within the district.	
	<input checked="" type="checkbox"/> Identify the mutual aid agreements in-place for the allocation of emergency facilities, equipment, and personnel.	
	<input checked="" type="checkbox"/> Describe the arrangements and integration of other first response efforts when local Fire Dept. abilities are limited (i.e., use of other Typed HM Teams, private contractors, etc.). Only fill out if a typed Hazmat Team is not available in the district.	
	<ul style="list-style-type: none"> <li>Identify/Describe any other arrangements made to provide resources or support.</li> </ul>	
	Comments:	
	<b>NOTE:</b> It is sufficient to reference actual lists/agreements in order to indicate what agreements exist. Agreements <u>in their entirety</u> should <u>not</u> be provided in the plan, unless the district so wishes.	
	<b>NOTE:</b> Below are <u>examples</u> of potential agreements that <u>may</u> exist: <ul style="list-style-type: none"> <li>Mutual aid agreements between response groups (i.e., fire and police departments, medical, ambulance).</li> <li>Agreements for additional resources, assistance, Good Samaritan Laws between neighboring response forces (i.e., fire and police depts.)</li> <li>Agreements for alert and notification and the dissemination of emergency public information (i.e., EAS, IPAWS).</li> <li>Agreements between medical facilities inside and outside the jurisdiction (ie. use of facilities, accepting patients, etc.).</li> <li>Evacuation agreements (e.g., use of buildings, restaurants, homes; with nearby jurisdictions; relocation centers; transportation).</li> <li>Ohio Fire Chiefs' Response Plan or IMAC</li> </ul>	

<b>ORC 3750.04 (A)(11)</b>  NRT-1, D-7  NRT-1A, 30	<b>2. <u>Training Program</u> The Plan <b>SHALL</b>:</b>	
	<input type="checkbox"/> Describe the district's standards and methods for meeting these standards	
	<input checked="" type="checkbox"/> Describe the training needs/standards for the district (i.e., Entry Teams require Tech, Decon Teams require Operations). A listing with specific names is not required.	
	<input checked="" type="checkbox"/> Describe the method(s) to see that personnel acquire and maintain those required levels of training. (If the methods are up to the individual response agencies, then make that statement in the plan)	
	<input type="checkbox"/> Describe the sources used to provide training (i.e., district Instructors, State, and/or Private Institutions). <input type="checkbox"/> Summarize the mechanism used to evaluate the effectiveness of training.	
	Comments:	
NRT-1, 55  NRT-1A, 18,23	<b>3. <u>Public Education</u> The Plan <b>Should</b>:</b>	
	<input type="checkbox"/> Describe/Summarize the programs that are used to educate the public about EHSs (i.e., pamphlets, school outreach, etc.).	
	<input type="checkbox"/> Describe the risk communication program in place to explain the EHS hazards faced in the district.	
	<input type="checkbox"/> Describe what educational measures are used to teach the public about what to do when an EHS is released.	
	Comments:	
<b>ORC 3750.04 (A)(5,8)</b>  NRT-1, 56 D-6,7,8  NRT-1A, 19-20	<b>4. <u>Resource Management</u> The Plan <b>SHALL</b>:</b>	
	<input type="checkbox"/> Provide a composite summary statement of specialized equipment, facilities, personnel, and emergency response organizations or cite a resource manual available for a response within the district.	
	<input checked="" type="checkbox"/> Summarize what specific resources exist within the district.	
	<input checked="" type="checkbox"/> Identify the heads of each emergency response organization within the district by title and office.	
	<input type="checkbox"/> Summarize what resources are needed and available from outside the district.	
	<input type="checkbox"/> In its pre-planning, explain how the district identifies what types of resources are needed for a response (i.e., hazard analysis results, facility inspections).	
	<input type="checkbox"/> Describe the mechanism to acquire and maintain resources prior to a response.	
	Comments:	

	<p><u>NOTE:</u> A Resource Manual/List/Database may be used to indicate the types of resources available, amounts on-hand, locations maintained, and steps needed to obtain the resources. This Section should then describe the existence and purpose of such a manual and how it may be accessed. A resource manual with actual identification and contact information for each of those Heads of Emergency Response Organizations meets the requirements. A FEMA Typing Certification can be used as it describes minimum capabilities. This NOTE defines both SHALLS in "Resource Management".</p>	
<p><b>ORC 3750.04 (A)(5,6,7)</b></p> <p>NRT-1, 52</p> <p>NRT-1A, 6, 13-15</p>	C. <u>Response Procedures</u>	
	1. <u>Initial Notification</u> The Plan <b>SHALL:</b>	
	<input type="checkbox"/> Explain/Describe the system for receiving/disseminating initial notification that a release has occurred.	
	<input checked="" type="checkbox"/> Explain how the Facility reports and the district receives and documents a call received under ORC 3750.06. <u>NOTE:</u> Inserting language of ORC 3750.06 meets and is recommended for the Facility report.	
	<input checked="" type="checkbox"/> Explain the procedure(s) to alert response and support agencies.	
	<input checked="" type="checkbox"/> Designate and describe the role of the LEPC's Community Emergency Coordinator.	
	<input checked="" type="checkbox"/> Describe when and how neighboring districts would be notified.	
	<ul style="list-style-type: none"> <li>Describe the use of Emergency Condition Levels (ECLs) in the notification process.</li> </ul>	
	<ul style="list-style-type: none"> <li>Include an Incident Summary Form and explain its use to document notifications. <u>NOTE:</u> This can be done and included as a Tab to the plan.</li> </ul>	
	Comments:	
<p><b>ORC 3750.04 (A)(4)</b></p> <p>NRT-1, 60-61</p> <p>NRT-1A, 9, 26</p>	2. <u>Incident Assessment</u> The Plan <b>SHALL:</b>	
	<input type="checkbox"/> Summarize/Identify the district's methods/procedures to assess the risks posed at an EHS release.	
	<input checked="" type="checkbox"/> Summarize the capabilities (general), based on training, of the district's Fire Departments, to assess a release.	
	<input checked="" type="checkbox"/> Summarize the capabilities (general), based on training, of the district's Law Enforcement agencies to assess a release.	
	<input checked="" type="checkbox"/> Summarize the capabilities (general), based on training, of the district's EMS personnel to assess a release.	
	<input checked="" type="checkbox"/> Identify the plans/SOPs/SOGs and agencies to be used to monitor the movement and effects of a release.	
	<input checked="" type="checkbox"/> Describe who utilizes the monitoring and assessment results and is authorized to make protective action decisions.	
	<ul style="list-style-type: none"> <li>Describe the district's ability to use or arrange for assessment tools.</li> </ul>	
	<ul style="list-style-type: none"> <li>Describe how the district arranges the testing of food and water supplies for contamination.</li> </ul>	

	○ Describe the district's measures used to prevent the contamination of water/sewer systems.	
	○ Describe the method to approach and conduct the initial size-up of the incident scene.	
	○ Describe the procedures to develop an action plan and control access to the scene.	
	○ Describe what actions the Facility personnel are expected to take to interact with and support first responder operations.	
	○ Describe the need and use of private agencies/contractors to support on-scene personnel and operations.	
	○ Summarize the assessment procedures the district's health department(s) will provide during an EHS incident, based on their abilities/limits.	
	Comments:	
<b>ORC 3750.04 (A)(4)</b>  NRT-1, 52-54  NRT-1A, 15-16	<b>3. <u>Direction and Control</u></b>	
	<b>a. <u>Incident Command</u> The Plan <b>SHALL</b>:</b>	
	<input type="checkbox"/> Diagram/Explain how the district implements an Incident Command System (ICS) to manage an EHS response.	
	<input checked="" type="checkbox"/> Diagram and/or explain the system and layout of the ICS to be used (i.e., how does a hazmat team fit into an existing ICS structure). 29CFR1910.120 requires site control, safety, medical monitoring, and communications be addressed that can be completed through ICS. No need to re-iterate ICS fundamentals.	
	<input checked="" type="checkbox"/> Explain how an incident command post (ICP) will be identified (if a specific identity is used different from normal ICS instruction).	
	<input checked="" type="checkbox"/> Identify who will select communication networks used during a response and if a specific communication network is used for hazmat response.	
	<input checked="" type="checkbox"/> Explain who has overall responsibility to maintain control (ORC 3737.80).	
	<input checked="" type="checkbox"/> Describe the method to coordinate on-scene hazmat activities with an activated EOC.	
	○ Describe the use of response action checklists or other forms/logs to manage on-scene operations.	
	○ Describe the mechanism to acquire resources and overcome resource shortfalls.	
	○ Explain the district's capabilities for 24-hour protracted operations.	
	○ Describe the method to obtain information on the chemicals involved, their characteristics, and related response measures.	
	○ Describe what actions the Facility personnel are expected to take to interact with	
	○ and support first responder operations.	

	<ul style="list-style-type: none"> <li>○ Identify the various support agencies that would be called to support on-scene responders and explain how their response procedures are to be implemented on-scene.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Describe the use and integration of State and Federal resources into the district's response system.</li> </ul>	
	Comments:	
<b>ORC 3750.04 (A)(4)</b>  NRT-1, 52-54 NRT-1A, 16	<b>b. <u>Emergency Operation Center</u> The Plan <b>SHALL</b>:</b>	
	<input type="checkbox"/> Identify the Primary/Alternate locations and summarize the use of an Emergency Operations Center (EOC) during an EHS response.	
	<input checked="" type="checkbox"/> Identify the Primary/Alternate locations and explain the mechanism to activate an EOC, primary or alternates, for an EHS incident.	
	<input checked="" type="checkbox"/> Summarize the roles of the EOC during an activation.	
	<input checked="" type="checkbox"/> Identify who is in charge of the EOC and describe how operations are managed in the EOC.	
	<input checked="" type="checkbox"/> Describe the EOC's capabilities or SOPs/SOGs to manage a 24-hour response.	
	<ul style="list-style-type: none"> <li>○ Provide a diagram of the primary and any alternate EOCs (locations, layouts, displays, etc.).</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Define the EOC staff requirements necessary for an EHS incident, and how/when notified.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Provide copies of sample forms or logs to be used by EOC personnel.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Describe what actions the Facility personnel are expected to take to interact with and support EOC operations.</li> </ul>	
	Comments:	
<b>ORC 3750.04 (A)(6)</b>  NRT-1, 54  NRT-1A, 16-17	<b>4. <u>Communications Among Responders</u> The Plan <b>SHALL</b>:</b>	
	<input type="checkbox"/> Summarize the system for providing reliable, timely and effective communications among responders during an EHS incident.	
	<input checked="" type="checkbox"/> Summarize the primary and backup communication methods (hardware) to exchange and coordinate communications, on- and off-scene.	
	<ul style="list-style-type: none"> <li>○ Identify the compatible frequencies used by agencies during a response (i.e., who can talk to whom to include contiguous local, state, and private agencies).</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Summarize how 24-hour communications is provided and maintained.</li> </ul>	
	Comments:	



<b>ORC 3750.04 (A)(4)</b>	<b>5. <u>Containment and Scene Stabilization</u> The Plan <b>SHALL</b>:</b>	
	<input type="checkbox"/> Summarize the capabilities and arrangements to be followed by Facility and district personnel to contain and stabilize an EHS release.	
	<input checked="" type="checkbox"/> Summarize the capabilities, based on training, of the district's various Fire Departments to contain and stabilize a release.	
	<input checked="" type="checkbox"/> Summarize the capabilities, based on training, of the district's Law Enforcement personnel to provide scene stabilization, such as traffic and access control.	
	<input checked="" type="checkbox"/> Summarize the arrangement and integration of other first response efforts when local Fire Department abilities are limited (i.e., use of HM Teams, Private Contractors, etc.) Only fill out if a typed Hazmat Team is not available in the county.	
	<input checked="" type="checkbox"/> Summarize if the district facilities capability exists to contain and stabilize a release.	
	Comments:	
<b>ORC 3750.04 (A)(4)</b>  NRT-1, 57  NRT-1A, 21-22	<b>6. <u>Response Personnel Safety</u> The Plan <b>SHALL</b>:</b>	
	<input type="checkbox"/> Describe the methods emergency and medical personnel will provide to ensure the responder safety.	
	<input checked="" type="checkbox"/> Describe the use of exclusion zones (i.e., Hot or Initial Release Area, Warm or Contamination Reduction, and Cold or Clean Zones) to account for responders while operating in and around the incident site, and entering and leaving the zones	
	o Describe the establishment and use of a scene Safety Officer and how response personnel safety is established and managed.	
	o Explain the limits of the district's response agencies to operate in each zone.	
	o Describe the district's procedures to setup and/or provide decontamination at the scene.	
	o Explain the use of mental health specialists to support responders during and after an incident.	
	o Explain the training and describe (or cite SOPs/SOGs) for traffic scene management that ensures responder safety on scene.	
	Comments:	
<b>ORC 3750.04 (A)(4)</b>  NRT-1, 57  NRT-1A, 20-21	<b>7. <u>Victim Treatment and Handling</u> The Plan <b>SHALL</b>:</b>	
	<input type="checkbox"/> Identify/summarize the capabilities of emergency response and medical personnel to provide for victim treatment during an EHS release.	
	<input checked="" type="checkbox"/> Summarize the capabilities, based on training, the district's various Fire Depts. and EMS personnel have to recover, treat and transport victims of a release.	

	<input checked="" type="checkbox"/> Summarize the capabilities, based on training, the Hospital response to support first responders in a release (i.e., the interaction that occurs between hospital staff and the medical transporter at the hospital.) The LEPC should not dictate procedures/plans to be used “in-house” at the hospital.	
	<input checked="" type="checkbox"/> Identify the hospitals that would be utilized in caring for contaminated patients within and/or outside of the district.	
	○ Explain the procedures used to protect crews/equipment from contamination.	
	○ Explain how EMS operations are coordinated with the on-scene commander.	
	○ Explain how EMS coordinates with hospitals/medical centers for patient care and transport.	
	○ Describe the use of a dedicated EMS unit to monitor and support a Hazmat Team	
	○ Define priorities for use of medical resources during an emergency.	
	○ Describe how hospitals/medical centers will coordinate with on-scene agencies during an incident.	
	○ Explain the use of mental health specialists to support victims during and after an incident.	
	○ Describe the coroner's role in an incident (i.e., identification, morgue expansion, etc.).	
	○ Describe the use and coordination of health professionals from outside agencies (i.e., Poison Centers, ODH, ATSDR, etc.).	
	Comments:	
<b>ORC 3750.04 (A)(4,9)</b>  NRT-1, 58-59  NRT-1A, 23-24	<b>8. <u>Personal Protection of Citizens</u></b>	
	<b>a. <u>Evacuation Procedures</u> The Plan <b>SHALL</b>:</b>	
	<input type="checkbox"/> Explain/Describe the methods used to implement an evacuation, to include provisions for alternate traffic routes and precautionary evacuations.	
	<input checked="" type="checkbox"/> Explain how evacuation procedures are to be implemented, and who has the authority to issue the order.	
	<input checked="" type="checkbox"/> Describe how and when the public is notified of this protective action.	
	<input checked="" type="checkbox"/> Indicate what protective actions the public may be advised to follow.	
	<input checked="" type="checkbox"/> Explain how evacuees will be moved, to include assisting mobility impaired individuals.	
	<input checked="" type="checkbox"/> Explain who will assign evacuation routes as well as alternate routes.	
	○ Describe the conditions necessary to initiate an evacuation.	
	○ Describe who controls traffic, manages its flow around the site, and provides security for the area.	

	<ul style="list-style-type: none"> <li>○ Describe how agencies coordinate the decision to return evacuees home.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Describe the procedure to inform evacuees of health concerns or actions to take when returning to homes/businesses.</li> </ul>	
	Comments:	
<b>ORC 3750.04 (A)(4,9)</b>  NRT-1, 58-59  NRT-1A, 23-24	<b>b. <u>Sheltering and Mass Care</u> The Plan <b>SHALL</b>:</b>	
	<input type="checkbox"/> Identify/Summarize sheltering and mass care provisions which are provided to evacuees.	
	<input checked="" type="checkbox"/> Identify the agencies, and summarize their capabilities to implement sheltering and mass care operations.	
	<input checked="" type="checkbox"/> Describe how contact is made for the establishment of sheltering or mass care.	
	<ul style="list-style-type: none"> <li>○ Describe how shelters coordinate with other response/support agencies.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Describe the methods to screen and handle evacuees exposed to an EHS.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Describe the methods to limit a shelter's population to exposure from an EHS and keep the shelter(s) free of contamination.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Describe the roles of medical personnel to support shelter operations.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Describe arrangements with other districts to assist in sheltering.</li> </ul>	
	Comments:	
<b>ORC 3750.04 (A)(4,9)</b>  NRT-1, 58-59  NRT-1A, 22-23	<b>c. <u>In-Place Sheltering</u> The Plan <b>SHALL</b>:</b>	
	<input type="checkbox"/> Identify/Describe the system, as an option to evacuation, for determining who initiates and the methods on how the public is notified.	
	<input checked="" type="checkbox"/> Identify who is responsible for initiating this action and describe how the public is notified.	
	<input checked="" type="checkbox"/> Describe the procedure used to communicate/implement this protective action.	
	<input checked="" type="checkbox"/> Indicate what protective actions the public will be advised to follow.	
	<ul style="list-style-type: none"> <li>○ Explain the decision-making process used to determine when in-place sheltering is to be implemented.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Describe the procedure on how to determine when to terminate the protective action.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Describe the procedure to inform the public to terminate sheltering and conclude this protective action.</li> </ul>	

	Comments:
<b>ORC 3750.04 (A)(6)</b>  NRT-1, 54-56  NRT-1A, 17-18	d. <u>Public Information</u> The Plan <b>SHALL</b> :
	<input type="checkbox"/> Identify/Describe the system for providing reliable, timely and effective communications to the public during an EHS incident.
	<input checked="" type="checkbox"/> Identify the systems in-place for public warning for each agency (i.e., EAS, sirens, PA's, door-to-door, social media, etc.) and describe their use to warn and notify the public (local and regional) and who has the authority to authorize the activation of the warning device.
	<input checked="" type="checkbox"/> Describe how vulnerable populations (i.e., schools, nursing homes, hearing-impaired, non-English speaking, etc.) are identified and alerted.
	<ul style="list-style-type: none"> <li>Describe the on-scene and off-scene procedures for coordinating public information releases (i.e., PIO's role, JIC's role, spiller/Facility's role).</li> </ul>
	<ul style="list-style-type: none"> <li>Explain the media's role during a release and how they will coordinate with local officials.</li> </ul>
	<ul style="list-style-type: none"> <li>List the media contacts and their capabilities for providing alerts and notifications to the district.</li> </ul>
	<ul style="list-style-type: none"> <li>Include sample messages relevant to an EHS release and protective actions, if applicable. (<u>Note:</u> These can be added as a Tab to the plan.)</li> </ul>
	<ul style="list-style-type: none"> <li>Describe the system for handling rumor control on- and off-scene (i.e., monitoring AM/FM radio, social media, and television broadcasts).</li> </ul>
	Comments:
	D. <u>Recovery Methods</u>
<b>ORC 3750.04 (A)(4)</b>  NRT-1, 62-63  NRT-1A, 28	1. <u>Cleanup and Disposal</u> The Plan <b>SHALL</b> :
	<input type="checkbox"/> Describe how emergency responders will coordinate for the Clean-up and Disposal from an EHS incident.
	<input checked="" type="checkbox"/> Describe how and with whom the cleanup and disposal process is coordinated (ORC 3737.80)
	<ul style="list-style-type: none"> <li>Describe who makes restoration recommendations during an incident.</li> </ul>
	<ul style="list-style-type: none"> <li>Describe the system to check the area for contamination prior to re-entry by the public.</li> </ul>
	<ul style="list-style-type: none"> <li>Describe the mechanism to ensure the safety of food and water supplies that were exposed to released EHSs.</li> </ul>
	<ul style="list-style-type: none"> <li>Describe the system or provisions for managing long-term site control.</li> </ul>
	Comments:

NRT-1, 63-64  NRT-1A, 29	2. <u>Investigative Follow-up</u> The Plan Should:	
	<input type="checkbox"/> Describe/Summarize the system to investigate the causes and circumstances of an EHS incident.	
	<ul style="list-style-type: none"><li>Describe what local agencies are involved when investigating spills or releases (i.e., Fire, Law, Prosecutor, EMA, LEPC, etc.) and their roles.</li></ul>	
	Comments:	
	3. <u>Documentation and Critique</u>	
NRT-1, 63-64  NRT-1A, 70	a. <u>Documentation</u> The Plan Should:	
	<input type="checkbox"/> Describe/Summarize the system the district uses to document each EHS incident.	
	<ul style="list-style-type: none"><li>Summarize what the types of reports are required and why.</li></ul>	
	<ul style="list-style-type: none"><li>Describe what agencies will be responsible to document on-scene and off-scene activities.</li></ul>	
	<ul style="list-style-type: none"><li>Summarize what agencies would review and maintain incident documentation.</li></ul>	
	<ul style="list-style-type: none"><li>Describe the LEPC's role regarding incident documentation.</li></ul>	
	Comments:	
NRT-1, 63-64  NRT-1, 67-68	b. <u>Critique</u> The Plan Should:	
	<input type="checkbox"/> Describe how the district reviews and discusses the response and how it worked versus plan procedures and training.	
	<ul style="list-style-type: none"><li>Summarize when and why a post-incident critique will be conducted and how it will be arranged.</li></ul>	
	<ul style="list-style-type: none"><li>Describe what agencies will be involved.</li></ul>	
	<ul style="list-style-type: none"><li>Summarize how the plan/SOPs/training are reviewed and revised as a result of the incident critique.</li></ul>	
	<ul style="list-style-type: none"><li>Describe how the LEPC implements an improvement planning process for After Action Reports/Improvement Plans (AAR/IP) to include the tracking of corrective actions and follow-up actions to ensure the completion of all identified corrective actions listed in each AAR/IP.</li></ul>	
	Comments:	
NRT-1, 63-64  NRT-1A, 29  Knox County Appellate decision Case No. 01CA0035	4. <u>Cost Recovery</u> The Plan Should:	
	<input type="checkbox"/> Describe the procedures to arrange for and receive cost reimbursement for a response.	
	<ul style="list-style-type: none"><li>Describe the role of the first responder and spiller to arrange for billing and cost recovery.</li></ul>	
	<ul style="list-style-type: none"><li>Summarize the process of the district's LEPC/EMA office and the applicable legal representative to arrange cost recovery as per ORC 3745.13.</li></ul>	

	<ul style="list-style-type: none"> <li>Summarize the procedure to use to recover costs through USEPA's cost recovery program.</li> </ul>	
	Comments:	
	<b>IV. PLAN MAINTENANCE</b>	
<b>REFERENCES #</b>	<b>PLANNING CRITERIA</b>	<b>SECTION / PAGE</b>
<b>ORC 3750.04 (A)(12)</b>  NRT-1, 64, 70  NRT-1A, 29	A. <u>Annual Plan Exercise</u> The Plan <b>SHALL</b> :	
	<input type="checkbox"/> Describe/Summarize the methods and schedules for exercising the plan.	
	<input checked="" type="checkbox"/> Summarize how the LEPC develops and conducts its annual exercise as per SERC rules. Citing the Ohio Hazardous Materials EEM meets this requirement.	
	<input checked="" type="checkbox"/> Describe/Identify the frequency/schedule of exercises to be completed during the four-year exercise cycle. Citing the Ohio Hazardous Materials EEM meets this requirement.	
	<ul style="list-style-type: none"> <li>Describe the role of an EHS Facility or HM Transporter in an exercise.</li> </ul>	
	<ul style="list-style-type: none"> <li>Summarize/Define the types of exercises to be used in the district.</li> </ul>	
	<ul style="list-style-type: none"> <li>Summarize the method to be used to evaluate and critique exercises, to include publicly debriefing Full-Scale exercises.</li> </ul>	
	<ul style="list-style-type: none"> <li>Describe the procedure for making changes to the plan based on the exercise critique.</li> </ul>	
	<ul style="list-style-type: none"> <li>Describe the procedure the district will use to claim an Actual Incident for exercise credit.</li> </ul>	
	<ul style="list-style-type: none"> <li>Describe the process/reasons for using exercises to validate planning and training.</li> </ul>	
	Comments:	
	<u>NOTE:</u> Use of the OHM-EEM, 'Ohio Hazardous Materials Exercise Evaluation Manual' is <b>required</b> , and use of the NRT-2, 'Developing a Hazardous Materials Exercise Program', is <i>recommended</i> .	
<b>ORC 3750.04 (B)</b>  NRT-1, 48, 65, 67-79  NRT-1A, 12	B. <u>Plan Review and Update</u> The Plan <b>SHALL</b> :	
	<input type="checkbox"/> Describe the process utilized to review and maintain the plan annually, or as changes in the district warrant.	
	<input checked="" type="checkbox"/> Describe the LEPC's responsibility to review and recommend changes to the plan and submittal to SERC by October 17 <sup>th</sup> each year.	
	<ul style="list-style-type: none"> <li>Describe the individual plan holder's responsibility to review and recommend changes to the plan.</li> </ul>	
	<ul style="list-style-type: none"> <li>Describe the LEPC's and Community Emergency Coordinator's role in plan revision.</li> </ul>	
	<ul style="list-style-type: none"> <li>Identify/Summarize to whom the plan is distributed, to include other LEPCs. (Note: this can be a Tab to this plan.)</li> </ul>	

	<ul style="list-style-type: none"> <li>○ Describe how information is to be checked on a regular basis, how changes are gathered, and how revisions are distributed.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Summarize how changes to the plan are to be documented by each plan holder.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Describe the Facility's role in updating or reviewing the plan.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Describe how/where/when the plan is made available to the public. See ORC 3750.02 and 3750.10.</li> </ul>	
	<p><b>NOTE:</b> It is highly recommended the LEPC develop a "freedom of information" form and policy specific to LEPC information as it contains legal concerns different from "ordinary" government information. Actual citing of the legal language in the form/policy is also recommended.</p> <p>Comments:</p>	
<p><b>V. <u>AUTHORITIES AND REFERENCES</u></b></p>		
<b>REFERENCES #</b>	<b>PLANNING CRITERIA</b>	<b>SECTION / PAGE</b>
<p>NRT-1, 43-44</p> <p>NRT-1A, 7</p>	<p>A. <u>Legal Authorities</u> The Plan Should:</p>	
	<input type="checkbox"/> Describe, list, or reference those applicable Local, State, and Federal laws that apply to the development of this plan.	
	<ul style="list-style-type: none"> <li>○ Local/Regional Ordinances or Statutes.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ State Ohio Revised Codes (ORC) (ORC 3750, 3745.13, 3737.80, 5502.38, etc.) and Ohio Administrative Codes (OAC) (OAC 3750-20-70 thru 84).</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Federal Standards and Regulations (CERCLA, SARA Titles I and III, OSHA 1910.120(q), OPA 90, NFPA 471-473, etc.).</li> </ul>	
	<p>Comments:</p>	
<p>NRT-1, E-1+</p>	<p>B. <u>References</u> The Plan Should:</p>	
	<input type="checkbox"/> Describe/List those references used for developing the plan and exercises that are available within the district.	
	<ul style="list-style-type: none"> <li>○ General planning references (i.e., NRT-1, Cross Reference, NRT-2, OHM-EEM, etc.).</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Technical references (DOT Guidebook, AAR/BOE Hazardous Materials Handbook, NIOSH guides, ATSDR manuals, etc.).</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Computer software modeling (i.e., CAMEO Suites, ARC GIS, etc.).</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Identify/Describe the location or availability of these references to personnel in the district.</li> </ul>	
<p>Comments:</p>		

	<b>VI. AUTHENTICATION</b> The Plan should:	
REFERENCES #	PLANNING CRITERIA	SECTION / PAGE
NRT-1, 43	<input type="checkbox"/> Provide a Promulgation Statement signed by, at a minimum, the district's Chief Elected Official(s) or the LEPC Chairman.	
NRT-1A, 6	Comments:	
	<b>VII. TABS</b>	
	<ul style="list-style-type: none"> <li>○ Provide a list of Tabs used to support the plan.</li> </ul>	
	<b><u>TAB A. Facility Data - Hazard Analysis Summaries</u></b>	
	<b><u>NOTE:</u></b> Use of a hazard analysis summary form and posting the information here as a Tab to the plan will meet the requirements indicated in Section II.A.1 and 2, (Situations). Use of a summary form is a technique only and is not specifically required. Additionally, for exercise purposes, a facility subject to the plan must address the SHALLS listed below.	
	<input type="checkbox"/> Identify/Summarize the major findings identified from a completed hazard analysis of each EHS Facility within the district.	
	<input checked="" type="checkbox"/> Identify those EHS Facilities within the district to include each Facility's name, address, and its Emergency Coordinator.	
	<input checked="" type="checkbox"/> Identify all adjoining Facilities that either may be at risk or adds risk due to their proximity to an EHS Facility within the district. A Geographic Information System (GIS) with this information can meet this requirement. The analysis must be identified in GIS, not the ability to do an analysis.	
NRT-1, 24-29, 44-45, 65	<input checked="" type="checkbox"/> Summarize the geographic area (sewers, streams, watersheds, city, farmland, residential, etc.) and the population likely to be affected (approximate numbers of homes, people, special facilities, types/numbers of properties, etc.) to be affected by a release from an EHS Facility within the district. GIS with this information can meet this requirement.	
NRT-1A, 10	<input checked="" type="checkbox"/> Identify the routes likely to be used to transport EHSs to and from each EHS Facility. GIS with this information can meet this requirement.	
	<input checked="" type="checkbox"/> Identify if the facility has an evacuation and/or response plan.	
	<ul style="list-style-type: none"> <li>○ Indicate what chemicals are on-site, and their quantities, characteristics, and storage conditions for each EHS Facility.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Describe the potential release scenarios and the possible consequences that would spread beyond the boundaries of an EHS Facility.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Summarize the EHS Facility's plan and ability to respond to a release.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Provide maps which identify the facilities and the special features within their vulnerable areas.</li> </ul>	



	Comments:	
	<u>NOTE:</u> Refer to Chapter Three of the NRT-1 for a description on how to complete a hazards analysis. The 'Technical Guidance for Hazards Analysis' should then be used, at a minimum or until the district acquires more technical abilities, to complete a hazard analysis. Such abilities could include, but are not limited to, the use of computer modeling (such as CAMEO Suites, GIS, etc.), or consultations of/by technical experts (such as a Facility's chemist/safety engineer).	
	<u>NOTE:</u> The plan does not need to maintain each completed hazard analysis and its respective vulnerable area map. The LEPC may elect to distribute those analyses to those agencies who have a need to use them. Meanwhile, a master list/file should be maintained in some fashion by the LEPC. Either way, the plan should describe how the analyses are maintained and distributed. Yet ultimately, the plan submitted to the State <b>must be accompanied by</b> each analysis and its map for review and emergency use purposes.	
	<u>NOTE:</u> A Tab can be developed to summarize the risks posed at/by specific transportation-related hazards (such as highways/roads/intersections, rail lines/yards, pipelines/stations, waterways/ports, etc.). If transportation-related hazard analyses are completed, summarize the information as explained above.	
NRT-1, 42-43 NRT-1A, 6	<u>TAB B. Incident Information Summary</u>	
	<input type="checkbox"/> Provide a format or method for recording essential information about the incident as reported under ORC 3750.06(A).	
	Comments:	
NRT-1, 50-51  NRT-1A, 13	<u>TAB C. Emergency Telephone Roster</u>	
	<input type="checkbox"/> Provide a telephone roster indicating local, state, federal, private, and other resources that could be used in a response.	
	Comments:	
	<u>NOTE:</u> Individual plan holder copies can be sanitized to prevent unnecessary disclosure of emergency or personal phone numbers. Only those who need to use these numbers should have them, and the LEPC should maintain a master list/file of these numbers. A resource manual as described earlier should meet these criteria. The resource manual should be shared with Ohio EMA.	
NRT-1, 44  NRT-1A, 7	<u>TAB D. Abbreviations, Definitions and Acronyms</u>	
	<input type="checkbox"/> Define/List those abbreviations, acronyms, and essential terms frequently used in this plan.	
	Comments:	

	<u>TAB x. (Others as Needed, such as: Resource Lists, Training Levels, Sample EAS Messages, etc.)</u>	
	<input type="checkbox"/> Explain here:	
	Comments:	