

## the Ohio Hazardous Materials Plan Development and Evaluation Guidance Document

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This guidance will explain the use and function of the Plan Development and Evaluation Guide whether you are developing, reviewing, and/or updating the LEPC's Chemical Emergency Response and Preparedness Plan. Please review this introduction before using the actual Guidance Document. It should save you time and frustration.

### A. Introduction:

Most communities have some type of written plan for responding to chemical emergencies. Ohio's Revised Code (ORC) Chapter 3750, titled "Emergency Planning," requires each LEPC in Ohio to have such a plan. Section .04 addresses the specific need to have such plans. Section .04, Paragraph (A), defines twelve requirements that every LEPC plan shall contain. That same Paragraph also defines a thirteenth requirement. It allows the State Emergency Response Commission (SERC) to add planning requirements, by rule, that will improve local response and preparedness. This Guidance Document was adopted by SERC as a additional planning requirement. The rule, Ohio Administrative Code (OAC) 3750-20-74, requires the SERC to provide this guidance to LEPC's for the development of their plans. It also states that this same guidance shall be used by the SERC's designated agency, the Ohio Emergency Management Agency (Ohio EMA), to review LEPC plans.

The guidance is to be used by each LEPC as they develop, revise, and update their plan. The Guidance Document, when used, will show the reader what information is to be addressed in the plan and where required information is located in the plan. The document outlines the planning information that shall and/or should be in any given plan. This guidance will support any plan format, such as a stand-alone plan or an attachment to an all-hazard Emergency Operations Plan (EOP). Obviously, the more complete and thorough a plan is, the better prepared the community should be to deal with a chemical emergency. Each community plan will have to be based on its own situations and resources.

**Please note that, the outline used in this Guidance Document is not meant to dictate or require the LEPC to follow this format.** The LEPC must use a format, an outline, or plan structure that best suits their community's needs. This guidance is only meant to identify those required and/or recommended elements each plan shall and/or should contain.

The information found in the Guidance Document was taken from a variety of sources regarding planning. The NRT-1, titled "Hazardous Materials Emergency Planning Guide," was developed by the National Response Team (NRT) to assist local communities. And recognizing that, the SERC ruled that "...each [LEPC] shall use, at a minimum, the NRT-1 and subsequently published

documents in preparing chemical emergency response plans.” The NRT then came out with the NRT-1A, entitled “Criteria for Reviewing Hazardous Materials Emergency Plans.” The essential elements within these documents are the basis of the Guidance Document’s development. With this information, the SERC’s Planning and Exercise Committee determined what elements are essential in addressing the information required by ORC 3750.04(A). Beyond that, they also recommended various elements that would improve the plan as it addresses local chemical emergency preparedness and response.

The emphasis of this document and the law is of course centered on planning for releases of Extremely Hazardous Substances (EHSs) at fixed facilities. Planning for other hazardous materials or sources of a release is at the discretion of the LEPC. If the community feels those hazards should be planned for, then by all means they can and should be addressed by their plan.

## B. Explanation of Terms and Symbols:

The Guidance 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 shows the information in three distinct sections. These are References, Planning Criteria, and Section/Page #. The sections are labeled across the top of each page 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 each page. This column explains the source from which the Planning Criteria information was taken. The source will be either from the ORC, the NRT-1, or the NRT-1A. These references are provided so that a person using the Guidance Document 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 three reference sources are described below.

a. ORC: This references a specific planning requirement under ORC 3750.04(A). It will be shown as “ORC” and a number in parentheses. Both will be in **bold print**. 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.

b. NRT-1: This references the NRT-1’s Chapter Five discussion 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.

c. NRT-1A: This references the plan review criteria found in the NRT-1A. The reference is shown as “NRT-1A” and a number. The number represents the page number(s) where this plan review criteria is discussed in the NRT-1A.

2. Planning Criteria: This heading is listed in the middle of each page. It identifies the planning criteria which is either required or recommended to be in the plan. The criteria is displayed in a working Outline. The Outline 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”: This statement follows the various Outline Title blocks. The statement means that the following information is **required to be addressed** in the plan by ORC 3750.04(A). A corresponding **ORC** reference will appear in the Reference column next to the planning criteria. This identifies the specific ORC 3750.04(A) requirement which needs to be addressed.

b. “The Plan Should”: This statement follows various Outline Title blocks. The statement means that the following information is recommended to be addressed in the plan. The information is considered to be essential to make a more effective and comprehensive plan, and thus should be addressed.

c. the symbol, “□”: This symbol follows each Outline Title. This indicates the actual block of information that is to be addressed for that title. The block of information will be either required or recommended as explained in item a. and b. above. A block of information is the relevant information that is to be developed by the LEPC and which will be reviewed by the SERC.

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 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 last heading is along the right side of each page. It provides a section to identify where the planning criteria to the left is located in your plan. A single blank line 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. This is the “Guidance Document” for which this guidance gets its name.

Below is an example to illustrate how these **Headings, Titles, Blocks, and Bullets**, will appear in the Guidance Document. Review this example to understand how the Guidance Document is setup and what the symbols and statements mean.

Guidance Document Example for Review:

<u>REFERENCE</u>	<u>PLANNING CRITERIA</u>	<u>SECTION/PAGE #</u>
NRT-1, 54 NRT-1A, 18,23	<p>3. <u>Public Education</u> The Plan Should:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Describe/Summarize the programs are used to educate the public about EHSs (ie. pamphlets, school outreach, etc.). _____</li> <li><input type="radio"/> Describe the risk communication program in-place to explain the EHS hazards faced in the District.</li> <li><input type="radio"/> Describe what educational measures are used to teach the public about what to do when an EHS is released.</li> </ul> <hr/>	
ORC (A)(5,8) NRT-1, 54-55 D-7,8 NRT-1A, 19-20	<p>4. <u>Resource Management</u> The Plan <b>SHALL</b>:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Provide a composite summary statement of specialized equipment, facilities, personnel, and emergency response organizations available for a response within the District. _____</li> <li><input checked="" type="checkbox"/> Summarize what specific resources exist within the District.</li> <li><input checked="" type="checkbox"/> Identify the Heads of each Emergency Response Organization within the District by Title and Office.</li> <li><input type="radio"/> Summarize what resources are needed and available from outside the District.</li> <li><input type="radio"/> In its pre-planning, explain how the District identifies what types of resources are needed for a response (ie. hazard analysis results, facility inspections).</li> <li><input type="radio"/> Describe the mechanism to acquire and maintain resources prior to a response.</li> </ul> <hr/>	

Lastly, the Guidance Document 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.

1. Describe: Webster’s dictionary defines this as giving a verbal account of, or transmitting a mental image or impression of a given subject. 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, to describe what I am wearing right now I would say, “I am wearing a long sleeve shirt which is light green with light blue and white stripes. My slacks are green, and are tapered at

the waist and cuffed at the feet. My belt is brown leather. My shoes are brown wingtips with fabric laces. And lastly my socks are solid black, over-the-calf, socks.” This is a fairly complete description of what I am wearing.

2. Explain: Webster’s dictionary defines this as making a subject understandable, to define or expound the subject, or to provide a mutual clarification of the subject. 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, to explain what I am wearing right now I would say, “I am wearing a long sleeve, 100% cotton, oxford shirt, size 16 neck and 34 sleeve. The shirt is light green with light blue and white vertical stripes. The collar is unbuttoned at the neck. My slacks, size 34 at the waist and 30 in the inseam, are forest green, and a cotton/polyester blend. The slacks are tapered at the waist and cuffed at the feet. My slacks are supported by a 34 inch, brown leather belt with a brass buckle and pin. My shoes are dark brown, suede, wingtips with woven fabric laces. And lastly my socks are solid black, over-the-calf, socks. I am not wearing a tie.” This is a fairly complete and detailed explanation of what I am wearing.

3. Identify: Webster’s dictionary defines this as how to find out the origin or nature of a subject. This implies a short, but descriptive, wording of what the subject is.

For example, to identify what I am wearing right now I would say, ”I am wearing an American Eagle, casual dress shirt, green dress slacks from J.R. Riggins, and brown suede Nunn Bush wingtips with black socks from Structure. This identifies the source and type of clothing I am wearing.

4. Summarize: Webster’s dictionary defines this as presenting a subject in condensed form or taking an abstract of a much larger work. 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, to summarize what I am wearing right now I would say, “I am wearing a long sleeve, light green, dress shirt, and green dress slacks with a brown belt. I am also wearing brown wingtip shoes with black, over-the-calf, socks.” This is a simple summary of what I am wearing.

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 Guidance Document:

The plan is a fluid document. The basic purpose of the plan is to provide 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 guidance to be used in the evaluation of the LEPC’s plan not only by the SERC but also 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 guidance assists in writing either a new plan or in modifying an existing plan. Before using this guidance, the LEPC should review NRT-1's discussion on the steps involved in the planning process (see Chapter 3 - Tasks of the Planning Team).

To begin the planning process, the LEPC should first review the thirteen planning requirements identified in ORC 3750.04(A). The LEPC should determine which requirements need to be addressed by the community. Next, based on the available information, prioritize which planning requirements to be developed and in what order. As this is done, review the Guidance Document 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** statements. Now, the planning team can develop the information to be in their plan.

As information is developed and completed, the planning team should ensure that each bullet for a given block of information is 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 Guidance Document. The LEPC should identify where each block of information can be found in the plan. This is done by writing the specific plan page and/or section on the line under the Section/Page # heading. These lines are located next to each block of information. If more than one page or section is used to address a particular block, then note those in space above or below that line. If the citations are too numerous to list, then one citation should be noted where the majority of information is addressed.

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. 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.

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. 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 planholders must review the plan. The LEPC should have a defined procedure on how and when to review the plan. The procedure should include the use of this guide. Before using this guidance, the LEPC should review NRT-1's discussion on the steps involved in evaluating the plan (see Chapter 6 - Plan Appraisal and Continuing Planning).

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

The first technique is that a reviewer can begin by reading the plan with a blank Guidance Document. As the plan is read, the reviewer would identify what block of information in the Guidance Document the plan is addressing. The reviewer would then place the plan's section and/or page number onto the line in the Guidance Document 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. Two lines are provided below each block of information for the reviewer to document comments 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 Guidance Document. This is a Guidance 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 this Guidance Document and start reading it. As they read each block of information, they would then locate 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. And as above, they would make appropriate comments on the two lines 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 planholders, the review process can act as a training program to familiarize personnel with the use and applicability of the plan. And the more involvement each person and/or planholder 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 planholder understands the purpose of the change or update.

#### D. Conclusions:

When used, this Guidance 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 planholders on the plan's contents.

As a reminder, plans and procedures are fluid and are routinely evolving documents. Therefore, this guidance may also change when and if circumstances dictate. And so, comments on how to improve or how to better utilize this document are always welcome and encouraged from any LEPC member or planholder. Comments should be directed to either the Ohio EMA's Hazardous Materials Planning Group, or the Hazmat Planner for your District. Send comments in writing, in person, or by phone to:

address: Richard Warren  
Field Operations Supervisor  
2855 West Dublin-Granville Road  
Columbus, Ohio 43235

phone: (614) 889-7169 Office / (614) 296-3341 Cell

**the Ohio Hazardous Materials  
Plan Development and Evaluation Guidance Document - it's Outline**

**For Stand-Alone or Appendix to  
EOP plans**

**I. Introduction**

- A. Plan's Purpose
- B. Plan Basis
- C. Relationship to Other Plans

**II. Situations and Assumptions**

- A. Situations
  - 1. Fixed Facility Hazards
  - 2. Transportation Hazards
- B. Assumptions

**III. Concept of Operations**

- A. Mitigation Activities
- B. Preparedness Activities
  - 1. Mutual Aid Plan
  - 2. Training Program
  - 3. Public Education
  - 4. Resource Management
- C. Response Procedures
  - 1. Initial Notification
  - 2. Incident Assessment
  - 3. Direction and Control
    - a. Incident Command
    - b. Emergency Operation Center
  - 4. Communications Among Responders
  - 5. Containment/Scene Stabilization
  - 6. Response Personnel Safety
  - 7. Victim Treatment and Handling
  - 8. Personal Protection of Citizens
  - 9. Emergency Public Information
- D. Recovery Procedures
  - 1. Cleanup and Disposal
  - 2. Investigative Follow-Up
  - 3. Documentation and Critique
  - 4. Cost Recovery

**IV. Plan Maintenance**

- A. Annual Plan Exercise
- B. Plan Review and Update

**V. Authorities and References**

- A. Legal Authorities
- B. References

**VI. Authentication**

- A. Signed Promulgation Statement

**VII. Tabs**

- A. Hazard Analysis Summaries
- B. Incident Information Summary Form
- C. Emergency Telephone Roster
- D. Abbreviations, Definitions, Acronyms
- x. (Others as needed, ie.EBS Messages)

**the Ohio Hazardous Materials  
Plan Development and Evaluation Guidance Document - it's Outline**

**Alternate Style For Stand Alone  
or Appendix to EOP plans**

**I. Introduction**

- A. Plan's Purpose
- B. Basis of the Plan
- C. Relationship to Other Plans

**II. Situations and Assumptions**

- A. Situations
  - 1. Fixed Facility Hazards
  - 2. Transportation Hazards
- B. Assumptions

**III. Concept of Operations**

- A. Mitigation Procedures
  - 1. Hazard Analysis/Tools
  - 2. (i.e. zoning, facility inspections)
- B. Preparedness Procedures
  - 1. Mutual Aid Plan
  - 2. Training Program
  - 3. Public Education
  - 4. Resource Management
- C. Response Procedures
  - 1. Initial Notification/Dispatch
  - 2. Incident Size-up/Assessment
  - 3. Direction and Control
    - a. On-Scene Operations
    - b. Off-Scene Operations
  - 4. Communications Among Responders
  - 5. Response Operations
    - a. Facility Procedures
    - b. Fire Dept. Procedures
    - c. Law Enforcement Procedures
    - d. EMS Procedures
    - e. Hospital Procedures
    - f. Health Dept. Procedures
    - g. Support Services Procedures
    - h. Private Agency Procedures
    - i. State and Federal Procedures

- 6. Personal Protection of Citizens
  - a. Evacuation
  - b. Sheltering/Mass Care
  - c. In-Place Sheltering
  - d. Public Information
- D. Recovery Procedures
  - 1. Cleanup, Disposal, and Recovery
  - 2. Investigative Follow-Up
  - 3. Documentation and Critique
  - 4. Cost Recovery

**IV. Plan Maintenance**

- A. Exercise Program
  - 1. Methods to Develop, Conduct, and Evaluate
  - 2. Exercise Cycle/Schedule
- B. Plan Review and Update
  - 1. Individual Agency Responsibilities
  - 2. LEPC Annual Review Process
  - 3. Plan Distribution

**V. Authorities and References**

- A. Legal Authorities
  - 1. Local Statutes/Ordinances
  - 2. Ohio Revised/Administrative Codes
  - 3. Federal Regulations/Standards
- B. Plan/Response References
  - 1. Manuals/Publications
  - 2. Computer Softwares

**VI. Authentication**

- A. Signed Promulgation Statement

**VII. Tabs**

- A. Hazard Analysis Summaries
- B. Incident Information Summary Form
- C. Emergency Telephone Roster
- D. Abbreviations, Definitions, Acronyms
- x. (Others as needed, ie.EBS Messages)

**For: Appendix to each EOP Annex**

**the Ohio Hazardous Materials  
Plan Development and Evaluation Guidance Document - it's Outline**

**I. Introduction**

A. Purpose

**II. Situations and Assumptions**

A. Situations

B. Assumptions

**III. Concept of Operations**

A. Mitigation Activities

B. Preparedness Activities

1. Mutual Aid Plan
2. Training Program
3. Public Education
4. Resource Management

C. Response Procedures

1. Initial Notification
2. Incident Assessment
3. Direction and Control
  - a. Incident Command
  - b. Emergency Operation Center
4. Communications Among Responders
5. Containment/Scene Stabilization
6. Response Personnel Safety
7. Victim Treatment and Handling
8. Personal Protection of Citizens
9. Emergency Public Information

D. Recovery Procedures

1. Cleanup and Disposal
2. Investigative Follow-Up
3. Documentation and Critique
4. Cost Recovery

**IV. Plan Maintenance**

A. Appendix Review and Update

**V. Authorities and References**

A. Legal Authorities

B. References

**VI. Authentication**

A. Signed Authentication Statement

**VII. Attachments** (if needed)

i. Table of Contents The Plan **SHALL**:

**ORC (A)(13)**  
NRT-1, 42  
NRT-1A, 7

- List all elements of the plan, and identify the locations of each planning requirement under ORC 3750.04(A). \_\_\_\_\_
- 

**I. INTRODUCTION**

A. Plan's Purpose The Plan Should:

NRT-1, 43-46  
NRT-1A, 12

- Describe why the plan was developed and how it is meant to be used. \_\_\_\_\_
  - Explain who has the authority to activate this plan.
- 

B. Plan Basis The Plan **SHALL**:

**ORC (A)(7)**  
NRT-1, 43  
NRT-1A, 10

- Describe the assumptions made and the methods used to complete the Hazards Analyses for each EHS Facility within the District. \_\_\_\_\_
  - Explain what methods were used to complete the analyses (ie. Technical Guidance for Hazard Analysis manual, computer software modeling (ARCHIE/CAMEO/EIS),etc.).
  - Describe the geographic assumptions (rural, urban, etc.) made when completing the analyses.
  - Describe the assumptions made about a material's quantity (avg amts, max amts, actual amts, etc.) and it's storage condition (one container, multiple containers, etc.).
  - Describe the weather factors (winds, temperatures, etc.) assumed while completing the analyses.
  - Explain how the Facilities were involved in the process (reviewed the analyses, participated in completing the analyses, etc.).
- 

C. Relationship to Other Plans The Plan Should:

NRT-1, 46  
NRT-1A, 10-11  
ORC (B)

- Identify other plans in the district and describe how they would be used in conjunction with this plan (ie. Hospital plans, EOPs, Facility plans, etc.). \_\_\_\_\_
  - Identify/Describe what other plans will be employed and how they will be coordinated when the plans are simultaneously put into action.
  - Summarize how Facility plans developed under OSHA are integrated with this plan.
  - Describe how this plan is coordinated with the plans of adjoining Districts.
- 

**II. SITUATIONS AND ASSUMPTIONS**

A. Situations

1. Fixed Facility Hazards The Plan **SHALL**:

**ORC (A)(1,2,5,7)**  
NRT-1, 43  
NRT-1A, 8-9

- Provide a brief account of the District's fixed facility hazardous materials risk sites. \_\_\_\_\_
- Identify those EHS Facilities within the District to include each Facility's name, address and it's Emergency Coordinator.

- ☒ Identify all adjoining Facilities that either may be at risk or adds risk due to their proximity to an EHS Facility within the District.
  - ☒ 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.
  - Identify those Non-EHS Facilities that have hazardous materials which pose a risk to the District.
  - Summarize the risks posed by the Non-EHS Facilities should a release occur at their sites
  - Describe the geographical areas and populations around those Non-EHS sites that may pose a risk to the District.
  - Describe the past spill history from Facilities (EHS and Non-EHS) within the District.
- 

**NOTE:** The information to be presented in this Section can be presented as a Tab to the plan. Refer to Tab A of this 'Cross Reference' for more information on utilizing this option. If a Tab is used, this Section should briefly explain Tab A's purpose and the information it contains. However, the spill history of the District should be summarized in this Section.

2. Transportation Hazards The Plan **SHALL**:

**ORC (A)(3)**  
NRT-1, 43  
NRT-1A, 8-9

- Provide a brief account of the District's EHS transportation risks. \_\_\_\_\_
  - ☒ Identify the routes likely to be used to transport EHSs to and from each EHS Facility.
  - Describe the types of transportation risks that exist (ie. major highways/roads/intersections, railines/yards/intersections, pipelines/stations, waterways/ports, etc.).
  - Summarize the risks posed by these hazards should a release occur.
  - Explain the geographical and population features near these hazards should a release occur.
  - Describe the past spill history regarding these transportation hazards.
- 

**NOTE:** 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 'Cross Reference' for more information on utilizing this option. If a Tab is used, this Section should briefly explain that the Tab contains the required information.

**NOTE:** 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. However, transportation spill history should be explained in this Section.

B. Assumptions The Plan Should:

NRT-1, 43  
NRT-1A, 8

- Describe/Summarize those assumptions concerning what would happen in the case of an accidental spill or release. \_\_\_\_\_
  - Describe the time variables that may influence response capabilities (rush hours, annual festivals, seasonal events, etc.).
  - Describe the weather factors that may affect release scenarios (winds, rains, etc.).
  - Describe the demographic features that impact response situations (ie. population densities, special population centers, etc.).
  - Summarize the District's capability or limits to respond and control a release.
- 

**III. CONCEPT OF OPERATIONS**

A. Mitigation Activities The Plan Should:

- Describe/Summarize those activities taken by the District to lessen the likelihood of a EHS release from occurring (ie. assigned traffic routes, zoning laws, facility visits/inspections, lowered chemical quantities, engineering/safety changes).
- 

B. Preparedness Activities

1. Mutual Aid Plan The Plan **SHALL**:

- Describe/Summarize the system for providing Mutual Aid to other Districts and within the District.
  - Identify the mutual aid agreements in-place for the allocation of emergency facilities, equipment, and personnel.
  - Summarize the agreements in-place to provide to other District's support during a release.
  - Identify/Describe any other arrangements made to provide resources or support.
- 

**ORC (A)(10)**  
NRT-1, 42  
NRT-1A, 11

**NOTE:** It is sufficient to reference actual lists/agreements in order to indicate what agreements exist. Agreements in their entirety should not be provided in the plan, unless the District so wishes.

**NOTE:** Below are examples of potential agreements that may exist:

- Mutual aid agreements between response groups (ie. fire and police depts., medical, ambulance).
- Agreements for additional resources, assistance, Good Samaritan Laws between neighboring response forces (ie. fire and police depts.)
- Agreements for alert and notification and the dissemination of emergency public information (ie. EAS).
- Resource Agreements (ie. outside assistance, personnel, equipment).
- Agreements between medical facilities inside and outside the jurisdiction (ie. use of facilities, accepting patients, etc.).
- Evacuation agreements (e.g., use of buildings, restaurants, homes; with nearby jurisdictions; relocation centers; transportation).
- Agreements between jurisdictions for the acceptance of evacuees.

2. Training Program The Plan **SHALL**:

- Describe/Summarize how the District provides or develops training programs and other types of educational programs for facility, emergency response, and medical personnel.
  - Describe the training needs/standards for the District, to include the current and refresher training needs of emergency personnel.
  - Describe the method(s) to see that personnel acquire and maintain those required levels of training.
  - Describe the sources used to provide training (ie. District Instructors, State, and/or Private Institutions).
  - Summarize the mechanism used to evaluate the effectiveness of training.
- 

**ORC (A)(11)**  
NRT-1, D-7  
NRT-1A, 30

3. Public Education The Plan Should:

- Describe/Summarize the programs that are used to educate the

NRT-1, 54

**REFERENCES**

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NRT-1A, 18,23

public about EHSs (ie. pamphlets, school outreach, etc.).

\_\_\_\_\_

- Describe the risk communication program in-place to explain the EHS hazards faced in the District.
- Describe what educational measures are used to teach the public about what to do when an EHS is released.

4. Resource Management The Plan **SHALL**:

**ORC (A)(5,8)**

NRT-1, 54-55

D-7,8

NRT-1A, 19-20

- Provide a composite summary statement of specialized equipment, facilities, personnel, and emergency response organizations available for a response within the District.

\_\_\_\_\_

- Summarize what specific resources exist within the District.
- Identify the Heads of each Emergency Response Organization within the District by Title and Office.
- Summarize what resources are needed and available from outside the District.
- In its pre-planning, explain how the District identifies what types of resources are needed for a response (ie. hazard analysis results, facility inspections).
- Describe the mechanism to acquire and maintain resources prior to a response.

**NOTE:** 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. Also, a Tab to this plan may be used to summarize/describe/identify the required information. If this is the case, this Section should identify that the Tab and its purpose.

C. Response Procedures

1. Initial Notification The Plan **SHALL**:

**ORC (A)(5,6,7)**

NRT-1, 50

NRT-1A, 6,13-15

- Describe/summarize the system for receiving/disseminating initial notification that a release has occurred.

\_\_\_\_\_

- Explain how the Facility reports and the District receives and documents a call received under ORC 3750.06.
- Explain the procedure(s) to alert response and support agencies.
- Designate and describe the role of the LEPC's Community Emergency Coordinator.
- Describe when and how neighboring Districts would be notified.
- Describe the use of Emergency Condition Levels (ECLs) in the notification process.
- Include an Incident Summary Form and explain its use to document notifications. (Note, this can be done and included as a Tab to the plan.)

2. Incident Assessment The Plan **SHALL**:

**ORC (A)(4)**

NRT-1, 59-60

NRT-1A, 9,26

- Describe/summarize the District's methods/procedures to assess the risks posed at an EHS release.

\_\_\_\_\_

- Describe the abilities, based on training, of the District's Fire Depts, to respond to a release.
- Describe the abilities, based on training, of the District's Law Enforcement agencies to respond to a release.
- Describe the procedures to be implemented by EMS personnel when responding to a release, based on current abilities and limits.
- Identify the procedures/agencies to be used to monitor the movement and effects of a release.

- Describe how monitoring and assessment results are used to make protective action decisions.
  - Describe the District's ability to use or arrange for assessment tools.
  - Describe how the District arranges the testing of food and water supplies for contamination.
  - 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.
- 

3. Direction and Control

a. Incident Command The Plan **SHALL**:

**ORC (A)(4)**  
NRT-1, 51-52  
NRT-1A, 15-16

- Describe/summarize how the District implements an Incident Command System (ICS) to manage an EHS response. \_\_\_\_\_

- Diagram and/or explain the system and layout of the ICS to be used.
  - Explain how an incident command post (ICP) will be established and identified.
  - Identify which communication networks are used during a response.
  - Explain who has overall responsibility to maintain control.
  - Describe the method to coordinate 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 manage each functional area or organization on-scene (ie. Fire Depts., Law, EMS, HM Teams, Support Services, etc.)
  - 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 how ECLs are established, what they mean, and how they are used throughout an incident.
  - Describe what actions the Facility personnel are expected to take to interact with and support first responder operations.
  - 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.
  - Describe the use and integration of State and Federal resources into the District's response system.
- 

b. Emergency Operation Center The Plan **SHALL**:

**ORC (A)(4)**  
NRT-1, 51-52  
NRT-1A, 16

- Identify the Primary/Alternate locations and describe/summarize the use of an Emergency Operations Center (EOC) during an EHS response. \_\_\_\_\_

- Explain the mechanism to activate an EOC, primary or alternates, for an EHS incident.
  - Describe the activities of the EOC during an EHS incident.
  - Identify who's in charge of the EOC, and describe how operations are managed in the EOC.
  - Describe the EOC's capabilities to manage a 24-hour response.
  - Provide a diagram of the primary and any alternate EOCs (locations, layouts, displays, etc.).
  - Define the EOC staff requirements necessary for an EHS incident, and how/when notified.
  - Provide copies of sample forms or logs to be used by EOC personnel.
  - Describe what actions the Facility personnel are expected to take to interact with and support EOC operations.
-

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4. Communications Among Responders The Plan **SHALL**:

**ORC (A)(6)**  
NRT-1, 53  
NRT-1A, 16-17

- Describe/summarize the system for providing reliable, timely and effective communications among responders during an EHS incident. \_\_\_\_\_
  - Describe/summarize the roles of the primary and backup communication methods (hardware and personnel) to exchange and coordinate communications, on and off-scene.
  - Identify the compatible frequencies used by agencies during a response (ie. who can talk to whom to include contiguous local, state, and private agencies).
  - Summarize how 24-hour communications is provided and maintained.
- 

**ORC (A)(4)**

5. Containment and Scene Stabilization The Plan **SHALL**:

- Describe/Summarize the methods and procedures to be followed by Facility and District personnel to contain and stabilize an EHS release. \_\_\_\_\_
  - Describe the abilities, based on training, of the District's various Fire Depts. to contain and stabilize a release.
  - Describe the methods and procedures to be followed by the District's Law Enforcement personnel to provide scene stabilization, such as traffic and access control.
  - Describe the arrangement and integration of other first response efforts when local Fire Dept. abilities are limited (ie. use of HM Teams, Private Contractors, etc.)
  - Describe the procedures District Facilities have to contain and stabilize a release.
- 

6. Response Personnel Safety The Plan **SHALL**:

**ORC (A)(4)**  
NRT-1, 58-59  
NRT-1A, 25-26

- Describe the methods and procedures emergency and medical personnel will provide to ensure the responder safety. \_\_\_\_\_
  - Describe the arrangement and integration of other first response efforts when local Fire Dept. abilities are limited (ie. use of HM Teams, Private Contractors, etc.)
  - Describe the establishment and use of a scene Safety Officer and how response personnel safety is established and managed.
  - Describe the use of exclusion zones (ie. 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.
  - Explain the limits of the District's response agencies to operate in each zone.
  - Describe the District's procedures to setup and/or provide decontamination at the scene.
  - Explain the use of mental health specialists to support responders during and after an incident.
- 

7. Victim Treatment and Handling The Plan **SHALL**:

**ORC (A)(4)**  
NRT-1, 55  
NRT-1A, 20-21

- Describe/summarize the methods and procedures to be followed by emergency response and medical personnel to provide for victim treatment during an EHS release. \_\_\_\_\_
- Summarize the procedures of the District's various Fire Depts. and EMS personnel have to recover,

treat and transport victims of a release, based on current abilities and limits.

- Summarize the methods and procedures to be implemented by Hospital personnel to support a response to a release, based on current abilities and limits.
- Identify the hospitals capable of handling contaminated patients within and/or outside of the District.
- Explain the procedures used to protect crews and 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 (ie. ICP, EMS) during an incident.
- Explain the procedures used to protect Hospital personnel and equipment from contamination.
- Explain the use of mental health specialists to support victims during and after an incident.
- Describe the coroner's role in an incident (ie. identification, morgue expansion, etc.).
- Describe the use and coordination of health professionals from outside agencies (ie. Poison Centers, ODH, ATSDR, etc.).

8. Personal Protection of Citizens

a. Evacuation Procedures The Plan **SHALL**:

**ORC (A)(4,9)**  
NRT-1, 57-58  
NRT-1A, 23-24

- Describe the methods used to implement an evacuation, to include provisions for alternate traffic routes and precautionary evacuations.

- Explain how evacuation procedures are to be implemented, and by whom.
- Describe how and when the public is notified of this protective action.
- Indicate what protective actions the public may be advised to follow.
- Explain how evacuees will be moved, to include assisting mobility impaired individuals.
- Explain how evacuation routes as well as alternate routes will be decided.
- Describe the conditions necessary to initiate an evacuation.
- Describe who controls traffic, manages its flow around the site, and provides security for the area.
- Describe how agencies coordinate the decision to return evacuees to their homes.
- Describe the procedure to inform evacuees of health concerns or actions to take when returning to homes/businesses.

b. Sheltering and Mass Care The Plan **SHALL**:

NRT-1, 57-58  
NRT-1A, 23-24

- Describe/summarize what reception and mass care provisions which are provided to evacuees.

- Identify the primary and secondary agencies, and explain their procedures to implement sheltering and mass care operations.
- Describe how shelters coordinate with other response/support agencies.
- Describe the methods to screen and handle evacuees exposed to an EHS.
- Describe the methods to limit a shelter's population to exposure from an EHS and keep the shelter(s) free of contamination.
- Describe the roles of medical personnel to support shelter operations.
- Describe arrangements with other Districts to assist in sheltering.

c. In-Place Sheltering The Plan Should:

NRT-1, 56-57  
NRT-1A, 22-23

- Explain the system, as an option to evacuation, for determining when and the methods on how to implement an in-place sheltering strategy. \_\_\_\_\_
  - Identify who is responsible for initiating this action.
  - Explain the decision-making process used to determine when in-place sheltering is to be implemented.
  - Describe the procedure used to implement this protective action.
  - Indicate what protective actions the public will be advised to follow.
  - Describe the procedure on how to determine when to terminate the protective action.
  - Describe the procedure to inform the public to terminate sheltering and conclude this protective action.
- 

d. Public Information The Plan **SHALL**:

**ORC (A)(6)**  
NRT-1, 53-54  
NRT-1A, 17-18

- Describe the system for providing reliable, timely and effective communications to the public during an EHS incident. \_\_\_\_\_
  - Identify the agencies involved in the warning process and describe the methods used to warn and notify the public.
  - Identify the systems in-place for public warning (ie. EBS, sirens, PA's, door-to-door, etc.) and describe their use to warn and notify the public.
  - Describe how special populations (ie. schools, nursing homes, hearing-impaired, non-English speaking, etc.) are identified and alerted.
  - Describe the on-scene and off-scene procedures for coordinating public information releases (ie. PIO's role, CP/EOC's role, JPIC's role, spiller/Facility's role).
  - Explain the media's role during a release and how they will coordinate with local officials.
  - List the media contacts and their capabilities for providing alerts and notifications to the district.
  - Include sample EBS messages relevant to an EHS release and protective actions, if applicable. (Note, these can be added as a Tab to the plan.)
  - Describe the system for handling rumor control on- and off-scene (ie. monitoring AM/FM radio and television broadcasts).
- 

D. Recovery Methods

1. Cleanup and Disposal The Plan **SHALL**:

**ORC (A)(4)**  
NRT-1, 60-63  
NRT-1A, 28

- Describe/Summarize how emergency responders will coordinate for the Clean-up and Disposal from an EHS incident. \_\_\_\_\_
  - Describe how and with whom the cleanup and disposal process is coordinated.
  - Describe who makes restoration recommendations during an incident.
  - Describe the system to check the area for contamination prior to re-entry by the public.
  - Describe the mechanism to insure the safety of food and water supplies that were exposed to released EHSs.
  - Describe the system or provisions for managing long-term site control.
- 

2. Investigative Follow-up The Plan Should:

NRT-1, 63  
NRT-1A, 29

- Describe/Summarize the system to investigate the causes and circumstances of an EHS incident. \_\_\_\_\_
  - Describe what local agencies are involved when investigating spills or releases (ie. Fire, Law, Prosecutor, EMA, LEPC, etc.) and their roles.
-

3. Documentation and Critique

a. Documentation The Plan Should:

NRT-1, 63  
NRT-1A, 29

- Describe/Summarize the system the District uses to document each EHS incident. \_\_\_\_\_
- Summarize what the types of reports are required and why.
- Describe what agencies will be responsible to document on-scene and off-scene activities.
- Summarize what agencies would review and maintain incident documentation.
- Describe the LEPC's role regarding incident documentation.

b. Critique The Plan Should:

NRT-1, 63

- Describe how the District reviews and discusses the response and how it worked versus plan procedures and training. \_\_\_\_\_
- Summarize when and why a post-incident critique will be conducted and how it will be arranged.
- Describe what agencies will be involved.
- Summarize how the plan/SOPs/training are reviewed and revised as a result of the incident critique.
- Describe how the LEPC ensures that identified deficiencies are corrected.

4. Cost Recovery The Plan Should:

NRT-1, 63  
NRT-1A, 29

- Describe the procedures to arrange for and receive cost reimbursement for a response. \_\_\_\_\_
- Describe the role of the first responder and spiller to arrange for billing and cost recovery.
- Summarize the process of the District's EMA office and the applicable legal representative to arrange cost recovery as per ORC 3745.13.
- Summarize the procedure to use to recover costs through USEPA's cost recovery program.

**IV. PLAN MAINTENANCE**

A. Annual Plan Exercise The Plan **SHALL**:

**ORC (A)(12)**  
NRT-1, 63  
NRT-1A, 29

- Describe/Summarize the methods and schedules for exercising the plan. \_\_\_\_\_
- Summarize how the LEPC develops and conducts its annual exercise as per SERC rules.
- Describe/Identify the frequency/schedule of exercises to be completed during the four-year exercise cycle.
- Describe the role of an EHS Facility or HM Transporter in an exercise.
- Summarize/Define the types of exercises to be used in the District.
- Summarize the method to be used to evaluate and critique exercises, to include publicly debriefing Full-Scale exercises.
- Describe the procedure for making changes to the plan based on the exercise critique.
- Describe the procedure the District will use to claim an Actual Incident for exercise credit.
- Describe the process/reasons for using exercises to validate planning and training.

**NOTE:** Use of the OHM-EEM, 'Ohio Hazardous Materials Exercise Evaluation Manual' is **required**, and use of the NRT-2, 'Developing a Hazardous Materials Exercise Program', is **recommended**.

B. Plan Review and Update The Plan Should:

ORC (B)  
NRT-1, 47, 64,  
67-70  
NRT-1A, 12

- Describe/Summarize the process utilized to review and maintain the plan annually, or as changes in the District warrant. \_\_\_\_\_
- Describe the individual plan holder's responsibility to review and recommend changes to the plan.
- Describe the LEPC's and Community Emergency Coordinator's role in plan revision.
- Identify/Summarize to whom the plan is distributed, to include other LEPCs. (Note, this can be a Tab to this plan.)
- Describe how information is to be checked on a regular basis, how changes are gathered, and how revisions are distributed.
- Summarize how changes to the plan are to be documented by each plan holder.
- Describe the Facility's role in updating or reviewing the plan.
- Describe how this 'Cross Reference' is used as guidance in the plan's development and used to review the plan as required by OAC 3750-20-74.
- Describe how/where/when the plan is made available to the public.
- Summarize the process the LEPC uses to submit the plan for annual review to the SERC.

**V. AUTHORITIES AND REFERENCES**

A. Legal Authorities The Plan Should:

NRT-1, 42  
NRT-1A, 7

- Describe, list, or reference those applicable Local, State, and Federal laws that apply to the development of this plan. \_\_\_\_\_
- Local/Regional Ordinances or Statutes.
- 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).
- Federal Standards and Regulations (CERCLA, SARA Titles I and III, OSHA 1910.120(q), OPA 90, NFPA 471-473, etc.).

B. References The Plan Should:

NRT-1, E-1+

- Describe/List those references used for developing the plan and exercises that are available within the District. \_\_\_\_\_
- General planning references (ie. NRT-1, Cross Reference, NRT-2, OHM-EEM, etc.).
- Technical references (DOT Guidebook, AAR/BOE Hazardous Materials Handbook, NIOSH guides, ATSDR manuals, etc.).
- Computer software modeling (ie. CAMEO, ARCHIE, EIS, etc.).
- Identify/Describe the location or availability of these references to personnel in the District.

**VI. AUTHENTICATION** The Plan **SHALL:**

NRT-1, 42  
NRT-1A, 6

- Provide a Promulgation Statement signed by, at a minimum, the District's Chief Elected Official(s) and the LEPC Chairman. \_\_\_\_\_

**VII. TABS**

- Provide a list of Tabs used to support the plan.

**TAB A. Facility Data - Hazard Analysis Summaries**

**NOTE:** 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. Consult your State planner for suggestions on using this option.

NRT-1, 46, 64-65  
NRT-1A, 8-9

- Provide/Summarize the major findings identified from a completed hazard analysis of each EHS Facility within the District. \_\_\_\_\_
- Describe/Map the each EHS Facility, its address, and their Emergency Coordinator.
- Describe/Map any adjoining Facility that either may be at risk or adds risk due to its proximity to an EHS Facility within the District.
- Describe/Map the routes used to transport EHSs to and from the Facility.
- 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.
- Indicate what chemicals are on-site, and their quantities, characteristics, and storage conditions for each EHS Facility.
- Describe the potential release scenarios and the possible consequences that would spread beyond the boundaries of an EHS Facility.
- Summarize the EHS Facility's plan and ability to respond to a release at their site (whether to directly handle the release, evacuate the Facility only, or a combination of the two).
- Provide maps which identify the facilities and the special features within their vulnerable areas.

**NOTE:** 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 ARCHIE, CAMEO, EIS/C, etc.), or consultations of/by technical experts (such as a Facility's chemist/safety engineer).

**NOTE:** 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 *must contain* each analysis and its map for review and emergency use purposes.

**NOTE:** A Tab can be developed to summarize the risks posed at/by specific transportation-related hazards (such as highways/roads/intersections, railines/yards, pipelines/stations, waterways/ports, etc.). If transportation-related hazard analyses are completed, summarize the information as explained above.

**TAB B. Incident Information Summary**

NRT-1, 40-41  
NRT-1A, 6

- Provide a format or method for recording essential information about the incident as reported under ORC 3750.06(A). \_\_\_\_\_

**TAB C. Emergency Telephone Roster**

NRT-1, 47-49

- Provide a telephone roster indicating local, state, federal, private, and

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other resources that could be used in a response.

\_\_\_\_\_

**NOTE:** 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. Finally, the State's copy of this plan should include these numbers.

**TAB D. Abbreviations, Definitions and Acronyms**

NRT-1, 42  
NRT-1A, 7

- Define/List those abbreviations, acronyms, and essential terms frequently used in this plan.

\_\_\_\_\_

**TAB x. (Others as Needed, such as: Resource Lists, Training Levels, Sample EBS Messages, etc.)**

- (Explain here:)

\_\_\_\_\_

*yes, it's the end....*