



INTEGRATED CONTINGENCY PLAN

FOR

**SOUTHEAST MISSOURI STATE UNIVERSITY
CAPE GIRARDEAU, MISSOURI**

Prepared by

**SOUTHEAST MISSOURI STATE UNIVERSITY
Risk Management Department**

JANUARY 2001

SOUTHEAST MISSOURI STATE UNIVERSITY

INTEGRATED CONTINGENCY PLAN

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SECTION I—PLAN INTRODUCTION ELEMENTS

1. Purpose and Scope of Plan Coverage

The goal of this Integrated Contingency Plan (ICP) is to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. The ICP contains the elements of the University's Integrated Contingency System (ICS) to be implemented during emergency response actions. The system is comprised of a team of University and Cape Girardeau Fire Department personnel who are trained in (1) response techniques, (2) communications during response actions, and (3) appropriate equipment to safely mitigate hazards related to chemical releases.

Implementation of the ICP is the responsibility of the Risk Management Department under the Occupational Safety and Environmental Health (OSEH) Program.

Organization of the ICP

The plan is organized into three (3) main sections; plan introduction, core plan, and response annexes. This organization allows for the response team to obtain primary information on response actions quickly, with additional information on core plan details following in the annexes. The plan was developed using the National Response Team's Integrated Contingency Plan Guidance (Federal Register/Volume 61, No. 109/June 5, 1996).

2. Current Revision Date

REVISION NO. 0: April 23, 2001

3. General Facility Identification Information

- a. Facility name: Southeast Missouri State University
- b. Owner/operator/agent: Southeast Missouri State University, an agency of the State of Missouri
- c. Physical address and telephone number of the facility:
One University Plaza
Cape Girardeau, MO 63701
573-986-6860
FAX 573-986-6835
- d. Mailing address of the facility (correspondence contact)
One University Plaza
C/O Risk Management, MS 3875
Cape Girardeau, MO 63701

e. Other identifying information:

Hazardous Waste Generator ID Number:

(SEMO Generator's U.S. EPA ID NO: MOD 981727647)

f. Key contact(s) for plan development and maintenance

Thomas M. Nelson-Risk Manager

573-986-6860

John Nelson (Safety Specialist)

573-651-2581

Dr. John Kraemer-Chemical Hygiene Officer

573-651-2355

Al Stoverink-Director for Facilities Management

573-651-2224

SECTION II—CORE PLAN ELEMENTS

1. Discovery

This section addresses the initial actions that the person(s) will follow when an incident of a hazardous nature is discovered.

2. Initial Response

The following general steps should be followed to ensure that there is a systematic response to the situation:

- Assess the problem
- Call for assistance, report problem
- Evacuate if necessary
- Render aid as necessary
- Control problem
- Make reports and legal notifications
- Return to "normal" as soon as possible

2.1 Procedures for internal and external notifications (i.e., contact, organization name, and phone number of facility emergency response coordinator, facility response team personnel, federal, state, and local officials)

During normal business hours (8:00 AM to 5:00 PM) the following University personnel shall be notified immediately:

- Southeast Missouri State University Department of Public Safety (DPS): For emergency response contact the campus police at 651-2215.
- The DPS dispatcher shall contact:
 - The on-call Incident Commander
 - Risk Management Office
 - Mr. Tom Nelson
RM 304 Academic Hall
1 University Plaza
Office Telephone Number 573-986-6860
Cellular Telephone Number 573-450-6830
 - Facilities Management (FM) operator at 651-2214
 - The FM operator shall contact the FM personnel on the Emergency Response Team
 - Emergency Response Coordinator
 - Mr. John Nelson
RM 304 Academic Hall
1 University Plaza
Office Telephone Number 573-651-2581
Pager: 573-986-6849

- Chemical Hygiene Officer
 - Dr. John Kraemer
Room 224 Rhodes Hall
Office Telephone Number 573-651-2355
- Cape Girardeau Fire Department: (Note: The Incident Commander shall make the determination on the need for Fire Department support. For emergency response contact the Fire Department at 911.)

The Emergency Response Team shall immediately assemble at the emergency response equipment building to mobilize equipment and personnel to the release site.

After the close of normal business at the University, and on weekends, the following procedures shall be implemented for mobilization of resources:

- For emergency response contact DPS at 651-2215.
- The DPS dispatcher shall contact:
 - The on-call Incident Commander,
 - The on-call Emergency Response Team member
 - Cape Girardeau Fire Department (if deemed necessary by the Incident Commander)

2.2 Response Management System

This section describes the “response level” to be used in emergency planning. This is the system for classifying emergencies according to the seriousness and assigning an appropriate standard response or series of response actions to each level. The following “response levels” will be used for classifying emergencies:

- **Level 1:** Potential Emergency Condition: An incident or threat of release that can be controlled by first responders and does not require evacuation other than the structure or immediate outdoor area.
- **Level 2:** Limited Emergency Condition: An incident involving a greater hazard or larger area that poses a potential threat to life, the environment, or property and which may require a limited evacuation of the surrounding area.
- **Level 3:** Full Emergency Situation: An incident/accident involving severe potential exposure for responders and the general public.

2.3 Procedures for Preliminary Assessment of the Situation

This section includes procedures for identification of incident type, hazards involved, magnitude of the problem, and resources threatened. The following steps must be accomplished during an incident response:

- Identify the substance,

- Evaluate its behavior when released and its effects on public health and the environment, and
- Initiate actions to prevent or modify its effects.

Site Entry and Reconnaissance

- *Preliminary assessment:* Conduct an off-site reconnaissance by:
 - Making visual observations including:
 - General layout of site
 - Wind direction
 - Placards, labels, markings on containers or transportation vehicles
 - Types, numbers, configuration and condition of containers
 - Observations on vapors, clouds
 - Interviews with witnesses
 - Monitoring atmospheric hazards near the site using:
 - Direct-reading instruments for: oxygen deficiency; combustible gases; radiation; gases, particulates; inorganic vapors, gases, particulates; and specific materials if known.
- *Initial Characterization:* Determine what hazards exist and if immediate protection measures are necessary. If there is no emergency (i.e. a Response Level 3 Emergency), time can be spent: (1) evaluating hazards; (2) designing action plans; and (3) establishing safety requirements for response personnel.
- *On Site Survey:* A more thorough evaluation of hazards generally requires personnel to enter the defined site. Before going on-site, an entry plan shall be developed to (1) address what will be initially accomplished and (2) give the procedures to protect the health and safety of response personnel. On-site inspections includes:
 - Photo-documentation of the situation.
 - Identification of potentially exposed populations.
 - Monitoring ambient air with direct-reading instruments.
 - Noting condition and types of containers, impoundments, etc.
 - Leaks or discharges from containers, tanks, etc.
 - Potential pathways for dispersion of contaminants
 - Placards, labels, markings or identification tags, or other indicators of material.
 - Standing water or liquids
 - Condition of soil
- *The Initial Characterization* and the *On-Site Survey* provide information to the Incident Commander for determining appropriate response to the hazardous materials release.
- *Containment and Cleanup:* Types and extent of cleanup will be determined by the Incident Commander.

2.4 Procedures for Establishment of Objectives and Priorities for Response

The Incident Commander shall establish the objectives and strategies for expeditiously mitigating the hazardous material release. The following definitions shall be used as an integral part of the Incident Command System (ICS):

- **INCIDENT OBJECTIVES** – Statements of guidance and direction necessary for the selection of appropriate strategies, and the tactical direction of resources. Incident objectives are based on realistic expectations of what can be accomplished when all allocated resources have been effectively deployed. Incident objectives must be achievable and measurable, yet flexible enough to allow for strategic and tactical alternatives.
- **STRATEGIES** – The general plan or direction selected to accomplish incident objectives.
- **TACTICS** – Deploying and directing resources during an incident to accomplish the desired objective.

Or a simpler perspective is that:

- **OBJECTIVES (Unified Command)** = What you plan to do in priority order
- **STRATEGIES (Planning & Operations)** = How you plan to accomplish objectives
- **TACTICS (Operations)** = How you use resources during each operational period to implement strategies. Since there are common priorities in any hazardous materials spill response, typical examples are provided in Annex 3.

2.4.1 Immediate goals/tactical planning (e.g., protection of workers and public as priorities)

Upon arrival at the scene, the initial responder(s) shall make a determination as to the immediate threat of exposure to hazardous materials to the university staff and public. Those individuals shall take immediate efforts to clear the area of all personnel.

All members of the Emergency Response Team shall utilize their training, as well as the NIOSH Pocket Guide to Chemical Hazards and the 2000 Emergency Response Guidebook published by the U.S. Department of Transportation, to evaluate the specific hazards of the released materials, and general information on how to protect site workers and the public during the initial response phase of the incident.

2.4.2 Mitigating Actions (e.g., discharge/release control, containment, and recovery, as appropriate)

Discharge and release control methods will be selected based on the nature of the hazardous materials and the logistics of the spill.

- In those situations where the ICS is invoked, the Incident Commander shall determine the methods to employ and equipment required for successful project

completion. The tactical plan for mitigation shall be discussed with the response team and individual assignments made by the Incident Commander.

- In those situations that involve an incidental spill that is not required to be addressed by the entire Emergency Response Team (i.e., the ICS is not invoked), the person in charge of the operations shall consult with the Risk Manager and the Emergency Response Coordinator to determine the appropriate clean-up methods and personal protection methods that are required.

Releases of hazardous substances that pose a significant threat to health and safety or that, by their very nature, require an emergency response regardless of the circumstances surrounding the release or the mitigating factors are emergency situations.

Some basic guidelines on spill response are as follows:

The following definitions designate an **emergency situation (Response Levels 2 or 3)**:

1. *The situation is unclear to the person causing or discovering the spill.*
2. *The release requires evacuation of persons.*
3. *The release involves or poses a threat of*
 - A. *Fire, suspected fire, explosion or other imminent danger*
 - B. *Conditions that are Immediately Dangerous to Life and Health (IDLH)*
 - C. *High levels of exposure to toxic substances.*
4. *The person(s) in the work area is uncertain they can handle the severity of the hazard with the personal protective equipment (PPE) and response equipment that has been provided and/or the exposure limit could easily be exceeded.*

*Conversely, releases that do not pose significant safety or health hazards to person(s) in the immediate vicinity or to the person(s) cleaning releases, and/or do not have the potential to become emergencies within a short time frame, are not emergency situations. The following situations **ARE NOT emergency situations (Response Level 1)**:*

1. *The person causing or discovering the release understands the properties and can make an informed decision as to the exposure level.*
2. *The release can be appropriately cleaned up by the lab personnel using authorized (certified) spill kits.*
3. *The materials are limited in quantity, exposure potential, or toxicity and present minor safety or health hazards to persons in the immediate work area or those assigned to clean up the activity.*

4. *Incidental releases of hazardous substances that are routinely cleaned up by trained Facility Management and/or RM personnel from outside the immediate release area need not be considered an emergency.*

Emergency Situation - Fire. *The following steps are basic protocol for handling a fire or fire-related emergency situation in the laboratory:*

1. *Pull the fire alarm.*
2. *Call 9-1-1 from a safe location.*
3. *Notify the Building Coordinator.*
4. *Evacuate all personnel from the building and immediate vicinity.*

Emergency Situation - Spill. *If the spill is of*

- *high toxicity or flammability or*
 - *you are unsure of how to proceed or*
 - *the spill is more than one liter, **execute the following:***
1. *Remove ignition sources and shut down equipment.*
 2. *Call the University Department of Public Safety (extension 2215)*
 3. *Evacuate personnel from the spill area and alert neighbors to the spill.*
 4. *Isolate the spill area and close doors to the room where the spill occurred.*
 5. *Establish exhaust ventilation to the outside of the building only. Turn on exhaust equipment. Open windows.*

Evacuation of the building is mandatory if chemicals or contaminants could enter the air circulation system of a building.

Attend to victims that have sustained a chemical splash:

1. *Remove person(s) from spill area to fresh air only if attempts to rescue victim(s) does not present a danger to the rescuers.*
2. *Remove contaminated clothing while under an emergency shower.*
3. *Flood affected area with cold water for at least 15 minutes or longer if pain persists.*
4. *Wash skin with mild soap and water - do not use neutralizing chemicals, unguents, cream or lotions.*
5. *Contact emergency response personnel and assure they know the chemical(s) involved.*

Attend to victims for an eye splash:

1. *Remove victim(s) from spill area to fresh air only if attempts to rescue victim(s) does not present a danger to the rescuers.*
2. *Lead the victim(s) immediately to an emergency eye wash facility.*
3. *Hold eye lids open.*

4. Flush eyes for at least 15 minutes or longer if pain persists.
5. Contact emergency response personnel and assure they know the chemical(s) involved.

Mercury Spills. For very small spills, less than 1 cc, such as a broken thermometer, use a trapped vacuum line attached to a tapered glass tube, similar to a medicine dropper, to pick up mercury droplets.

1. Do not use a domestic or commercial vacuum cleaner.
2. Cover small droplets in accessible areas with one of the following:
 - o sodium polysulfide solution
 - o powdered sulfur
 - o silver metal compounds
 - o dry ice to freeze the mercury droplets
3. Place residue in container for hazardous waste collection.

For large spills, i.e. greater than 1 cc, contact RM for spill cleanup, instructions or assistance.

Spill Kits. Ready access to a chemical spill kit is required in laboratories that work with hazardous chemicals. Minimally, such a kit should contain:

- splash resistant goggles
- chemical resistant gloves
- plastic bags
- multi-chemical sorbent (enough for 2 gallon spill)
- scooper

Most spills greater than 1 liter in volume require assistance from trained personnel from the Emergency Response Team.

Some sorbents are chemically specific. The best sorbents are those which can be used to clean up all types of chemical spills. Check absorbents in spill kits for their absorbency range.

Each laboratory's spill kit should be kept in a readily accessible location and each employee should be trained on how to use the spill kit.

Non-Emergency Situation - Spill. If the spill is less than one liter and the chemical involved is of low toxicity and a low flammable hazard, handle it in the following manner (NOTE: **If there are questions about proper spill response techniques, call the RM or the CHO**):

1. Locate the spill kit.
2. Choose the proper protective equipment:
 - o Always wear gloves and protective eye wear

- *Use additional protective equipment such as an apron, coveralls, or boots.*
 - *Use a fitted respirator if there is an inhalation hazard above the permissible exposure limit.*
3. *Confine or contain the spill.*

For non-reactive spills:

- A. *Cover liquid spills with spill kit absorbent and scoop into a plastic disposal bag.*
- B. *Sweep solid materials into a dust pan and place in a sealed container.*
- C. *Dispose of waste as normal trash as long as substance is non-volatile, non-hazardous.*

For reactive or potentially reactive spills:

- A. *Cover liquid spill with spill kit absorbent and scoop into an appropriate disposal container.*
- B. *Wet mop dry substances to avoid spreading hazardous dust, provided it is non-water reactive.*
- C. *If spilled chemical is a volatile solvent, transfer disposal bag to a hood for evaporation of solvent.*
- D. *Follow the Southeast Missouri State University Waste Disposal Guide for disposal. A copy of the guide can be obtained from the Risk Management Department, extension 6840.*

2.4.3 Identification of resources required for response

Based on the reconnaissance of the release area, a decision shall be made by the Incident Commander on the need for outside resources. That decision shall be made after objectives and the tactical plan have been developed. *The Incident Commander, or the person in charge of operations, shall not hesitate to call the Cape Girardeau Fire Department immediately if there is a question on the severity of the incident.*

Resources, including personnel, hazardous response contractors, and emergency equipment are contained in Annex 3.

2.5 Procedures for implementation of tactical plan

The tactical plan shall be implemented according to the direction of the Incident Commander, who shall determine:

- The exclusion zone
- Source control measures
- Need for additional resources

2.6 Procedure for mobilization of resources

2.6.1 During normal business hours (i.e., 8:00 AM to 5:00 PM)

The following procedures shall be implemented for mobilization of resources:

- For emergency response contact DPS at 651-2215.
- The DPS dispatcher shall contact:
 - The on-call Incident Commander
 - Risk Management Office
 - Mr. Tom Nelson
RM 304 Academic Hall
1 University Plaza
Office Telephone Number 573-986-6860
Cellular Telephone Number 573-450-6830
 - Facilities Management (FM)operator at 651-2214
 - The FM operator shall contact the FM personnel on the Emergency Response Team
 - Emergency Response Coordinator
 - Mr. John Nelson
RM 304 Academic Hall
1 University Plaza
Office Telephone Number 573-651-2581
Pager: 573-986-6849
 - Chemical Hygiene Officer
 - Dr. John Kraemer
Room 224 Rhodes Hall
Office Telephone Number 573-651-2355
 - Cape Girardeau Fire Department: (Note: The Incident Commander (or person in charge of operations) shall make the determination on the need for Fire Department support. For emergency response contact the Fire Department at 911.)

The Emergency Response Team shall immediately assemble at the emergency response equipment building to mobilize equipment and personnel to the release site.

2.6.2 After the Close of normal business at the University, and on Weekends

The following procedures shall be implemented for mobilization of resources:

- For emergency response contact DPS at 651-2215.
- The DPS dispatcher shall contact:
 - The on-call Incident Commander (DPS will be provided a list of pager numbers and the on-call schedule for the team)
 - The on-call Emergency Response Team members, and
 - Cape Girardeau Fire Department (if deemed necessary by the Incident Commander).

3. Sustained Actions

The Risk Management Department is responsible for ensuring that remediation of the chemical release is completed according to Federal and State regulations. Actions beyond the initial emergency response that are necessary to remediate the release will be performed by qualified waste vendors and remediation contractors. Risk Management will identify those actions and procure the appropriate services through Facilities Management and/or the Purchasing Department.

4. Termination and Follow-Up Actions

In the case of hazardous chemical spills, certain regulations may become effective once the “emergency” is declared over. Risk Management shall determine the regulatory requirements that must be met during and after an incident. An overview of the Federal and State laws governing environmental protection is provided in Annex 4.

At the completion of the emergency activities, the Incident Commander is responsible for the following activities:

- Prepare a written incident report using the Hazardous Material Spill Report Form (Annex 2).
- Record the names and organizations that responded to the incident.
- Submit the forms and documentation to Risk Management the following business day after the incident.

Risk Management will provide copies of the Hazardous Material Spill Report to the following:

- Southeast Missouri State University’s Vice President for Business and Finance
- Southeast Missouri State University Legal Counsel
- SEMO Regional Local Emergency Planning District (LEPD)
 - 573-204-0911
- Missouri Department of Natural Resources

SECTION III-ANNEXES

Annex 1. Facility and Locality Information

This annex provides detailed information to responders on the layout of the facility and the surrounding environment. Also provided is detailed information critical to the response such as the location of discharge sources, shut-off valves and response equipment, and potentially affected human populations.

Annex 1a. Facility Maps

Annex 1b. Facility Drawings

1c. Facility description/layout

This section includes identification of facility hazards and vulnerable resources and populations on and off the University campus that may be impacted by an incident.

Populations

The University's enrollment is approximately 9,000 students during the fall and spring semesters. During the summer session months (May, June, July, August), the enrollment decreases to approximately 2,000. In addition to the student population, the university employs approximately 1,000 staff and faculty members. At any given time during the day and evening, numerous activities are also conducted that involve the participation of the general public. The largest events held for public attendance are football and basketball games, commencement exercises, and events at the Show Me Center.

There are also residential populations and student housing on campus and in the immediate vicinity of the campus. The most heavily populated residential areas directly adjacent to the campus are on the southeast, west and northwest boundaries of the campus.

Annex 1a shows the topography of the campus and surrounding area. Annex 1b presents the locations of tanks and hazardous chemicals on the main campus. For additional information on the university's hazardous chemicals and appropriate handling/disposal methods, see the Chemical Hygiene Plan and the Spill Prevention and Countermeasures Control Plan (SPCC), both available from Risk Management (extension 6840).

ANNEX 2-NOTIFICATION

2a. Internal notifications

During normal business hours, upon initial discovery, the following University personnel shall be notified immediately:

- Southeast Missouri State University Department of Public Safety: For emergency response contact DPS at 651-2215.
- The DPS dispatcher shall contact
 - The on-call incident commander
 - Risk Management Office
 - Mr. Tom Nelson
RM 304 Academic Hall
1 University Plaza
Office Telephone Number 573-986-6860
Cellular Telephone Number 573-450-6836
 - Chemical Hygiene Officer
 - Dr. John Kraemer
Room 224 Rhodes Hall
Office Telephone Number 573-651-2355
 - Facilities Management operator at 651-2214
 - Emergency Response Coordinator
 - Mr. John Nelson
RM 304 Academic Hall
1 University Plaza
Office Telephone Number 573-651-2581
Pager: 573-986-6849
Cellular Telephone Number 573-450-6235
 - Cape Girardeau Fire Department: (Note: The Incident Commander shall make the determination on the need for Fire Department support. For emergency response contact the Fire Department at 911.
 - Radiation Safety Officer
 - Dr. Walt Lilly
Room 209 Rhodes Hall
Office Telephone Number: 573-651-2359

The Emergency Response Team shall immediately assemble at the Emergency Response Equipment room, located at GS-2 adjacent to the Power Plant, to mobilize equipment and personnel to the release site.

After the close of normal business at the University, and on weekends, the following procedures shall be implemented for mobilization of resources:

- For emergency response contact DPS at 651-2215.
- The DPS dispatcher shall contact:

- The on-call Incident Commander,
- The on-call Emergency Response Team member, and
- Cape Girardeau Fire Department (if deemed necessary by the Incident Commander).

2b. Community notifications

The following list of organizations shall be notified, depending on the nature and extent of the release. The Incident Commander shall make the determination on the requirement for notification of these organizations.

- Cape Girardeau Fire Department: For emergency response contact the Fire Department using the 911 telephone number
- Spills to the city sewer must be reported to the City of Cape Girardeau Public Works Department at 334-9151 (after hours emergency contact 335-6621)

(NOTE: The hazardous materials storage building does not have a fire alarm or fire suppression system. In the event of an emergency fire, contact the Cape Girardeau City Fire Department. Always provide as much information as possible, in a clear and concise manner. The minimum information should include identification of the person calling, the type and extent of the problem, and the location. Always allow the answering party to hang up first; this ensures that all of their questions are answered.)

2c. Federal and state agency notifications

- Missouri Department of Natural Resources: Environmental Services Program

Most environmental emergencies involve spills of hazardous materials that must be reported to the Department of Natural Resources at (573) 634-2436. Staff personnel from the Environmental Emergency Response (EER) section provide various kinds of technical assistance and on site activities related to incidents involving hazardous materials. Personnel staff a 24-hour telephone hotline, (573) 634-2436, to receive notification of environmental emergencies. Callers can also receive technical assistance about response, containment and cleanup of hazardous materials. Staff are often dispatched to the scene of a spill, leak or other release to provide technical advice and hands-on expertise about hazardous materials.

Environmental emergency response staff are based at the department's central offices in Jefferson City as well as at regional offices in St. Louis, Poplar Bluff, Kansas City, Macon and Springfield.

Department of Natural Resources
Division of Environmental Quality
Environmental Services Program
P. O. Box 176, Jefferson City, MO 65102
(573) 526-3315

Other Sources of Information:

- CHEMTREC 1-800-424-9300
- Pesticide Hotline 1-800-858-7378
- National Response Center 1-800-424-8802
- RCRA and Superfund Hotline 1-800-424-9346

Hazardous Waste Cleanup/Disposal

Hazardous Waste vendors on contract with Southeast Missouri State University that currently provide routine hazardous waste pickups are also tasked with providing emergency support as necessary. The Emergency Response Coordinator (651-2581) or Purchasing (290-5999) can provide information on contractors.

The following contractors are currently on the Missouri Statewide Contract for Comprehensive Hazardous Substance Management:

- Heritage Environmental Services, LLC – (636) 388-3500
- Haz-Mat Response, Inc. – (913) 782-5151
- Environmental Specialists, Inc. – (816) 523-5081

INSERT FORM

- **Hazardous Materials Incident Report**

ANNEX 3-RESPONSE MANAGEMENT SYSTEM

a. General

This annex includes information on the response management system for the Southeast Missouri State University campus.

b. Command

(1) Facility Incident Commander and Qualified Individuals

The University's Emergency Response organizational chart is presented on the following page.

Specific Job Descriptions

- *Risk Manager*: Responsible for day-to-day operations of the Occupational Safety and Environmental Health Program. Reports to the Vice President for Business and Finance.
- *Safety Specialist*: Responsible for implementation of the OSEH programs, and fills the *Emergency Response Coordinator* position. Reports to the Risk Manager.
- *Chemical Hygiene Officer*: Responsible for the implementation of the Chemical Hygiene Plan within the College of Science and Mathematics.
- *Facilities Management Director*: Responsible for maintenance and capital improvement projects at the university.
- *Director of Department of Public Safety*: Responsible for public safety and law enforcement at the university.
- *Incident Commander*: Responsible for the operations at an emergency spill release that is conducted under the Incident Command System.

Revision 0
4/23/01

INSERT University's Emergency Response organizational chart

(2) Information on Internal and External Communications

- Emergency Management (EM) Coordinator: The EM Coordinator is responsible for implementation of the Incident Command System. Specific duties include formation of HAZMAT Response Team, ensuring appropriate levels of training for all response personnel, and maintenance of response equipment.
- Information on Internal Communications
 - The following individuals/departments must be notified immediately of a emergency situation:
 - Department of Public Safety:
Telephone No. 651-2215
 - University On-Call Incident Commander (Note: the Department of Public Safety maintains a current schedule of on-call personnel, with their pager, cellular phone, and home phone number.)
 - Emergency Management Coordinator: Telephone No. 651-2581
 - Risk Manager:
Telephone No. 986-6860
 - Facilities Management:
Telephone No. 651-2214
 - As the situation develops, the incident commander must keep the lines of communication open to each of the above individuals or departments. Depending on the situation severity, it may be necessary to report emergency situations immediately to the Vice President for Business and Finance: Telephone No. 651-2570.
 - Mobilization of contract emergency responders must be authorized through Risk Management.
- Information on External Communications
 - Any communication (during the emergency activities) with media personnel will be authorized through the Incident Commander.
 - Status reports and other formal communications during normal business hours will be reviewed by Risk Management and disseminated through the University Relations office (651-2552).

(3) Safety

The overall direction and safe conduct of activities at an emergency response shall be the responsibility of the Incident Commander. All emergency response personnel are responsible for operating within the guidelines of their respective level of safety training. Listed below are the levels of safety training (ref: OSHA 29 CFR 1910.120 (q)) for the University's *skilled support personnel*:

- **First Responder Awareness Level:** Individuals who are likely to witness or discover a hazardous substance release. They shall have the ability to realize the need for additional resources, and to make appropriate notifications to the communication center.
 - **Training:** Includes general awareness of hazardous substances; potential outcomes associated with an emergency; ability to recognize the presence of hazardous substances; the ability to identify the hazardous substance, if possible; understanding of the role of the first responder awareness level individuals in the emergency response plan.
- **First Responder Operations Level:** Individuals trained to respond to hazardous substance releases for the purpose of protecting nearby people, property or the environment. Their function is to contain the release, but from a safe distance.
 - **Training:** At least 8 hours of training, including the following:
Knowledge of basic hazard and risk assessment techniques; selection and proper use of personal protective equipment (PPE); basic hazardous materials terms; basic control, containment or confinement operations; basic decontamination procedures; and relevant standard operating procedures.
- **Hazardous Materials Technician:** Individuals responding to hazardous substance releases for the purpose of stopping the release. They assume a more aggressive role in that they will approach the point of release in order to plug, patch or otherwise stop the release.
 - **Training:** At least 24 hours of training, including the following:
Implementation of the emergency response plan; use of field survey instrumentation; their roles and specific functions in the ICS; selection and use of PPE; understanding of hazardous materials terms; advanced control, containment or confinement operations; basic decontamination procedures; relevant chemical and toxicological terms; and relevant standard operating procedures.
- **Hazardous Materials Specialist:** Responds with and supports the Hazardous Materials Technician, but requires a more directed or specific knowledge of the various substances they may be called upon to contain. These individuals would also act as the liaison with Federal, State, local and other authorities during a site release.
 - **Training:** At least 24 hours of training equal to the Hazardous Materials Technician and in addition have competency in: implementation of the Local Emergency Response Plan; advanced field survey instrumentation; State Emergency Response Plan; select and use advanced PPE; in-depth understanding of hazard and risk techniques; perform specialized control

and containment; decontamination procedures; development of site safety and control plans; chemical, radiological and toxicological terminology.

- **On-Scene Incident Commander:** Assumes control of the incident scene beyond the first responder awareness level. This individual will be responsible for the implementing the emergency response plan.
 - **Training:** At least 24 hours of training equal to the First Responder Operations Level and in addition have competency in: know the Incident Command System and Emergency Response Plan; hazards and risks associated with employees working in chemical protective clothing; implementation of the Local Emergency Response Plan; State Emergency Response Plan; decontamination procedures.

Additional information on specific training required by the university as part of the prevention system for emergency response incidents is contained in Annex 7.

(4) Liaison—Staff mobilization

Given that parallel mobilization may be occurring by various response groups, the process of integration (i.e., unified command) is important. The following system will be used by the University to delegate command during emergency responses:

- Step No. 1: Following the notification of an emergency situation, the on-call University Incident Commander shall be designated as the person in charge of operations. If the Cape Fire Department arrives on-scene prior to the university's Incident Commander, then the fire department's site officer will be in charge of operations.
- Step No. 2: After the arrival of all emergency response personnel, the Incident Commander shall be designated as the person with the highest level of training and experience, and has an in-depth understanding of the university's ICP.
- Step No. 3: The Incident Commander shall communicate directly with the University management personnel as described under Annex 2 of this ICP.
- Step No. 4: The emergency response personnel shall secure the scene and take appropriate actions to minimize the impacts to human health and the environment from the hazardous materials release.
- Step No. 5: After the scene has been secured and the release contained, the Emergency Management Coordinator shall assume responsibility for further environmental project activities related to site remediation. The Coordinator shall report project details to the Risk Manager and the Director of Facilities Management. All reports filed to the regulatory agencies shall be the responsibility of the Coordinator.

c. Operations

Operational response objectives

Incident objectives and strategies are essential prerequisites to any written or oral Incident Action Plan (IAP), and should be established expeditiously.

The following definitions have been developed in the National Interagency Incident Management System (NIIMS) Incident Command System (ICS):

- **INCIDENT OBJECTIVES** - Statements of guidance and direction necessary for the selection of appropriate strategies, and the tactical direction of resources. Incident objectives are based on realistic expectations of what can be accomplished when all allocated resources have been effectively deployed. Incident objectives must be achievable and measurable, yet flexible enough to allow for strategic and tactical alternatives.
- **STRATEGIES** - The general plan or direction selected to accomplish incident objectives.
- **TACTICS** – Deploying and directing resources during an incident to accomplish the desired objective.

Or a simpler perspective is that:

- **OBJECTIVES (Unified Command)** = What you plan to do in priority order
- **STRATEGIES (Planning & Ops.)** = How you plan to accomplish objectives
- **TACTICS (Ops.)** = How you use resources during each operational period to implement strategies Since there are common priorities in any oil spill response, the following examples of typical objectives may be applied to many situations.
- **Typical Objective: Ensure the Safety of Citizens and Response Personnel**
 - **Example Strategies:**
 - *Identify hazard(s) of spilled material*
 - *Establish site control (hot zone, warm zone, cold zone, and security)*
 - *Consider evacuations, as needed*
 - *Monitor air in impacted areas*
 - *Develop site safety and health plan for response personnel*
 - *Ensure safety briefings are conducted*
- **Typical Objective: Control the Source of the Spill**
 - **Example Strategies:**
 - *Complete emergency shutdown*
 - *Conduct firefighting*
 - *Initiate temporary repairs*
 - *Transfer product*
 - *Conduct salvage operations, as necessary*
- **Typical Objective: Manage Coordinated Response Effort**
 - **Example Strategies:**
 - *Complete or confirm notifications*
 - *Establish a unified command organization and facilities (command post, etc.)*

- *Ensure local and tribal officials are included in response organization*
- *Initiate spill response Incident Action Plans (IAP)*
- *Ensure mobilization and tracking of response resources*
- *Account for personnel and equipment*
- *Complete documentation*
- *Evaluate planned response objectives vs. actual response (debrief)*
- **Typical Objective: Maximize Protection of Environmentally-Sensitive Areas**
 - **Example Strategies:**
 - *Implement pre-designated response strategies*
 - *Identify resources at risk in spill vicinity*
 - *Track oil movement and develop spill trajectories*
 - *Conduct visual assessments*
 - *Develop/implement appropriate protection tactics*
- **Typical Objective: Contain and Recover Spilled Material**
 - **Example Strategies:**
 - *Deploy containment boom at the spill source*
 - *Deploy containment boom at appropriate collection areas*
 - *Conduct open-water skimming with vessels*
 - *Evaluate time-sensitive response technologies (e.g., dispersants, in-situ burning)*
 - *Develop disposal plan*
- **Typical Objective: Minimize Economic Impacts**
 - **Example Strategies:**
 - *Consider local economic impacts throughout response*
 - *Protect public and private assets, as resources permit*
 - *Establish damage claims process*
- **Typical Objective: Keep Stakeholders Informed of Response Activities**
 - **Example Strategies:**
 - *Provide forum to obtain stakeholder input and concerns*
 - *Provide stakeholders with details of response actions*
 - *Identify stakeholder concerns and issues, and address as practical*
 - *Provide elected officials details of response actions*
- **Typical Objective: Keep the Public Informed of Response Activities**
 - **Example Strategies:**
 - *Provide timely safety announcements*
 - *Establish a Joint Information Center (JIC)*
 - *Conduct regular news briefings*
 - *Manage news media access to spill response activities*
 - *Conduct public meetings, as appropriate*

(2) Discharge or release control

Based upon the information available at the time of the incident, the first responders shall make a preliminary assessment of the site response needs. If there is any doubt at all that the incident should be handled using the university's emergency response system, the responders are directed to make the conservative decision to implement the system as detailed in this ICP.

(3) Assessment/monitoring

This section includes procedures for identification of incident type, hazards involved, magnitude of the problem, and resources threatened. The following steps must be accomplished during an incident response:

- Identify the substance,
- Evaluate its behavior when released and its effects on public health and the environment, and
- Initiate actions to prevent or modify its effects.

Site Entry and Reconnaissance

- *Preliminary assessment:* Conduct an off-site reconnaissance by:
 - Making visual observations
 - General layout of site
 - Wind direction
 - Placards, labels, markings on containers or transportation vehicles
 - Types, numbers, configuration and condition of containers
 - Observations on vapors, clouds
 - Interviews with witnesses
 - Monitoring atmospheric hazards near the site
 - Use direct-reading instruments for: oxygen deficiency; combustible gases; radiation; gases, particulates; inorganic vapors, gases, particulates; and specific materials if known.
- *Initial Characterization:* Determine what hazards exist and if immediate protection measures are necessary. If there is no emergency, time can be spent: (1) evaluating hazards; (2) designing cleanup plans; and (3) establishing safety requirements for response personnel.
- *On Site Survey:* A more thorough evaluation of hazards generally requires personnel to enter the defined site. Before going on-site, an entry plan shall be developed to (1) address what will be initially accomplished and (2) give the procedures to protect the health and safety of response personnel. On-site inspections includes:
 - Monitoring ambient air with direct-reading instruments.
 - Noting condition and types of containers, impoundments, etc.
 - Leaks or discharges from containers, tanks, etc.
 - Potential pathways for dispersion of contaminants

- Placards, labels, markings or identification tags, or other indicators of material.
- Standing water or liquids
- Condition of soil
- *The Initial Characterization* and the *On-Site Survey* provide information to the Incident Commander for determining appropriate response to the hazardous materials release.

(4) Containment

The emergency response team shall take the necessary actions to contain or immobilize the spilled hazardous materials. Those actions could include the following:

- Containment using earthen berms
- Containment using diking materials
- Containment using absorbent pads or booms.

(5) Recovery

Following the initial phase of the incident, there may be contaminated materials that need to be placed in containment for shipment offsite. The Environmental Management Coordinator will supervise the transferal of materials to the containment systems, and ensure that the materials are manifested and transported to a licensed treatment, storage and disposal facility.

(6) Decontamination

Decontamination procedures are presented in Attachment No. 1 to Annex 3.

(7) Non-responder medical needs including information on ambulances and hospitals

The Incident Commander shall contact the following hospital for emergency medical situations:

Southeast Missouri Hospital
1701 Lacey Street
Cape Girardeau, MO 63701
Emergency Phone Number 651-5555

(8) Salvage plans

Following the initial phase of the incident, there may be contaminated materials that need to be placed in containment for shipment offsite. The Environmental Management Coordinator will supervise the transferal of materials to the containment systems, and ensure that the materials are manifested and transported to a licensed treatment, storage and disposal facility.

d. Planning

- (1) Hazard assessment, including facility hazards identification, vulnerability analysis, prioritization of potential risks

The following facilities have been identified on the Southeast Missouri State University campus and immediate vicinity that contain chemicals of a potential hazardous nature:

Facility	Location	Chemicals	Capacity	Containment
Petroleum Product Tanks				
Waste Oil Tank	FM Service Center	Waste Oil	55 gallon	Yes
Waste Oil Tank	GS-2	Waste Oil		Yes
#3 AST - Diesel	Pole Barn	Diesel	2500 gallons	Yes
#5 AST - Diesel	GS-1	Diesel	2000 gallons	None
#6 AST-Diesel	GS-1	Diesel	2000 gallons	None
#7 AST-Diesel	Show-Me Center	Diesel	275 gallons	None
#8 AST - Unleaded Gasoline	GS-1	Unleaded Gasoline	1000 gallons	Yes
#9 AST - Diesel	GS-1	Diesel	1000 gallons	Yes
#10 AST- Diesel	North Chiller Plant	Diesel	550 Gallons	Yes
#11 AST-Diesel	Power Plant	Diesel	4000 Gallons	Yes

Science Department-Magill and Rhodes Hall				
Outside Chemical Waste Bunker	Magill Hall	Various	Small containers	Partial
Outside Chemical Product Storage Bunker	Magill Hall	Various	Small Containers	Partial
Magill Hall Room 215 Chemical Storerroom	Magill Hall		Small Containers	None
Magill Hall- Radioactive Waste Storage Facility	Magill Hall Room ??	Materials stored in this vault are restricted to low level radioactive isotopes the Nuclear Regulatory Commission. All materials are from laboratory research. There is no high level waste (waste from spent nuclear reactor fuel or fuel reprocessing) stored in this area. There are both long and short half-life materials stored here awaiting shipment or going through a decay process prior to legal disposal. This vault is not regulated by the MDNR and is under the control and monitoring of the University Radiation Safety Officer at 651-2359.		

Facilities Management				
FMSC Parts Cleaner	FM Services Center	??	??	??
Power Plant Sulfuric Acid	Power Plant	Sulfuric Acid		None
PCB waste container	Pole Barn	PCB waste and decon materials	55 gallon drum	Yes
Sulfuric Acid	??	Sulfuric Acid	165 gallons	None
Betz-Dearborn Dianodic	??	??	550 gallons	Yes
Sno-Glo Bleach	??	Bleach	55 gallons	None
Betz-Dearborn Spectros NX106	??	??	120 gallons	Yes

Vulnerability Analysis and Prioritization of Risks

- a. Petroleum Product Tanks: Product leaks from the onsite petroleum storage tanks have the potential to enter the surface water and groundwater systems. Fire or explosive risks are also a potential hazard with these tanks. Acute toxicity risks are not expected from these chemicals for short-term exposures.
- b. Science Department Chemical Stocks (Magill and Rhodes Hall): Minor leaks from the containers of chemical stock will not pose a significant environmental risk unless the chemicals are released directly onto the ground surface or migrate through cracks in the concrete floor. Many of the chemicals may have an acute toxicity risk to individuals through the dermal or inhalation pathways. The chemical stockroom supervisor, students, faculty and staff shall be aware of the potential exposure risk and understand the emergency exit procedures from their work locations. A fire or explosion in the chemical bunker storeroom, Room 215 storeroom, or any of the research labs in Magill and Rhodes Hall could create a significant threat to human health from exposure to released hazardous vapors. The Cape Girardeau Fire Department, University Department of Public Safety, and the Emergency Response Team shall be aware of the hazards, and trained on the appropriate evacuation measures for a catastrophic release.
- c. Facilities Management Chemicals: The greatest risk to human health at Facilities Management is the sudden and catastrophic release of sulfuric acid from the large bulk tanks at the Power Plant. Depending on the location of the spill, it may be necessary to evacuate the Power Plant and FM personnel from the office and work areas in GS-1 and GS-2.

Emergency Conditions: listed below are several common emergency situations that may be encountered and appropriate responses:

- System Failure: If a system should fail or malfunction such as ventilation, water, fire protection, security, explosion venting or other mechanical, electrical or building system the problem must be reported to Maintenance for correction as soon as possible. Critical systems such as fire alarm, electrical and ventilation

must have immediate action taken to repair the problem. Call the FM Service Center (ext 2214) or the DPS (ext 2215) after normal working hours.

- **Break-In/Burglary:** Any break-in/burglary should be reported to DPS at ext. 2215 immediately. Evidence should be preserved and the scene untouched until DPS releases it. Assistance must be given to DPS to prevent injury especially if chemicals are spilled or released. Chemical health and safety information must be passed immediately to the DPS to protect against adverse exposures. A police report must be made of all break-in or theft incidents no matter how small.
- **Severe Weather Plan:** All work should be halted in the facility if severe weather warnings are issued. The University operates under the Emergency Preparedness Guide during severe weather.

(2) Protection

Population Protection: Spills of hazardous materials may involve potential exposures to the university staff, students, and the general population.

- **Residential Population:** There are residential populations primarily to the immediate southeast, west and northwest boundaries of the university.
- **Student Population:** The greatest concentration of student population is the Towers dormitories, which house approximately 1,200 students.
- **University Staff:** The university employs approximately 1,000 people. Those individuals most likely to be exposed to hazardous situations include:
 - i. Science Department Faculty, Staff and student workers
 - ii. Facility Management
 - iii. Department of Public Safety
 - iv. Risk Management

In the event of a catastrophic accident that causes a significant release of hazardous vapors (for example, a fire or explosion in Magill Hall), immediate evacuation of the Towers Dormitory residents, and the residents immediately adjacent to the university in a down-wind direction, may be required.

(3) Coordination with natural resource trustees

A Natural Resource Damage Assessment (NRDA) may be required after a significant event has occurred, and could involve natural resource trustees. The university management will make the decision on how to support NRDA activities after the incident has been fully investigated.

(4) Waste management

Waste materials, including containment materials, absorbent pads, along with impacted soils and personal protective equipment, will likely be generated during a hazardous materials release response. Waste management will include:

- Utilization of 55 gallon drums to containerize waste materials as they are generated. This will prevent exposure and minimize impacts to the surrounding uncontaminated areas. Drums will be marked with the date, location and contents, using a paint stick or similar device.
- Drums will be staged in a bermed area with an asphalt or concrete surface. The areas will be lined with heavy gauge plastic sheeting, with the berms consisting of 2 by 4 lumber nailed together in a rectangular manner.
- Bulk soils that are impacted by contaminants shall be excavated and placed in a bermed area, with heavy gauge plastic covering the entire pile.

e. Logistics

(1) Medical needs of responders

The Incident Commander shall contact the following hospital for emergency medical situations:

Southeast Missouri Hospital
1701 Lacey Street
Cape Girardeau, MO 63701
Emergency Phone Number 651-5555

(2) Site security

The exclusion zone shall be identified using Yellow Caution tape. The Incident Commander shall assign one individual on the emergency response team to be in charge of ensuring security around the exclusion zone until the Department of Public Safety has arrived on the scene.

(3) Communications (internal and external resources)

The emergency response team shall maintain communications with internal and external resources via cellular phone.

(4) Transportation

Transportation to the incident will be provided in University-owned vehicles. Personal vehicles may also be required in cases where the incident occurs outside of normal business operations.

(5) Equipment maintenance and support

The Risk Management Department shall have the responsibility for maintaining the stock of emergency equipment. This will include the maintenance of the SCBAs, personal protective gear, and spill containment equipment. The individual response team personnel shall be responsible for maintaining their air-purifying respirators.

f. Finance/procurement/administration

(1) Resource List/Federal and State Support

The following resources may be available to the university during emergency response situations. The Incident Commander shall coordinate the communications and potential utilization of these resources:

- Missouri Department of Natural Resources Environmental Emergency Response Team (EERT).
- U.S. Environmental Protection Agency Environmental Response Team (ERT)
- North American Emergency Response Guidebook
- CHEMTREC
- Southeast Missouri Regional Local Emergency Planning District (LEPD)

(2) Personnel management

- Personnel on the emergency response team will be volunteers from the following university departments:
 - i. Science Department Faculty, Staff and student workers
 - ii. Facility Management
 - iii. Department of Public Safety
 - iv. Risk Management

Day-to-day management of these personnel will be the responsibility of the department managers. However, during routine training and actual response situations, the team will be under the command of the Incident Commander or the Emergency Response Coordinator.

(2) Response equipment

FIELD EQUIPMENT LIST

Equipment

Drums
Tanks
Boxes
Vehicles

Water

Tools/equipment
Fire extinguishers

Monitoring Instruments
Tools
Video cameras
Tape recorders

Combustible gas indicators

Miscellaneous

EPA Extremely Hazardous
Chemicals Profiles
“Department of Transportation
Emergency Response Guidebook”

Oxygen meter
Sprayers
Radios/“walkie-talkies”
Telephones
Megaphones

Detector tubes
Organic survey meters
Radiation survey meters
Litmus paper, pH paper

First aid/trauma kits

Containment Devices:

Booms
Patches, plugs
Sand bags
Pneumatic bags
Plastic sheets/tarps
Neutralizers
Sorbents
Shovels

Communications Equipment Contamination Reduction Equipment

Buckets, tubs, containers
Plastic
Brushes
Water
Detergent

Personal Protective Equipment:

Respirator
Pressure demand SCBA
Air-purifying respirators
Chemical protective clothing
Splash suits
Duct tape
Face shields
Eye protection
Gloves
Boots
Hardhats

Documentation Equipment

Still cameras
Note pads

References

Clipboards
Binoculars

Barriers for site control

Sampling Equipment

Sampling devices
Containers
Labels
Packaging

(3) Contracting

Facilities Management coordinates all capital improvements throughout the campus. Issues involving maintenance of systems should be directed to extension 2214.

Risk Management coordinates all occupational safety and environmental health programs on campus. Budgets for these programs, including the maintenance of the Emergency Response Team and coordination of all hazardous waste disposal activities are the responsibility of RM.

(4) Claims procedures

Insurance claims are processed through the Risk Management Department. Immediate notification must be given to the State Risk Management Office (573-751-4044) and the university's legal counsel. Notifications to the property-insurance carrier are typically due within 30 days of the event. Documentation, including incident reports and photographs, shall be the responsibility of the Emergency Management Coordinator. Risk Management shall maintain communication with the State Risk Management Office, Vice President for Business and Finance, and the university's legal counsel throughout the claims process.

(5) Cost documentation

Risk Management shall be responsible for maintaining documentation of costs and account information through the university's budget office. While some contingency funding is available for emergency response situations, special accounts may be required to track costs for particularly large projects. Budgets for response situations shall be estimated by the Risk Management Department, and approved through the Vice President for Business and Finance.

ANNEX 3- ATTACHMENT NO. 1

DECONTAMINATION PROCEDURES

ANNEX 4-INCIDENT DOCUMENTATION

a. Post accident investigation

Post accident investigations shall be performed as soon as possible after the occurrence of an incident. The accident investigation shall include:

- Suspected cause(s) of the accident
- Areas of the University campus affected by the incident
- Quantification of incidental releases of hazardous constituents to the environment
- Assessment of exposures to individuals
- Environmental Regulatory Requirements: EPA has promulgated the following laws, contained in 40 CFR (Code of Federal Regulations) that could affect the management of hazardous waste releases:
 - i. Clean Air Act (CAA): EPA has set up primary and secondary Ambient Air Quality Standards (Section 109)
 - ii. Clean Water Act (CWA): Section 311 set up reportable quantities to report spills to the National Response Center.
 - iii. Safe Drinking Water Act (SWDA): Section 1412 establishes maximum contaminant levels in drinking water.
 - iv. Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA): Prevent unreasonable adverse effects on the environment and public health.
 - v. Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or Superfund): Provides a system of identifying and cleaning up hazardous waste sites.
 - vi. Resource Conservation and Recovery Act (RCRA): Regulates the management of hazardous waste through concept of “cradle to grave”.
 - vii. Toxic Substance Control Act (TSCA): Gives EPA broad authority to regulate chemicals without regard to specific use or area of application if they are present in the environment.
- The following Missouri statutes may be applicable to a release of a hazardous substance:
 - i. Title 10-MISSOURI DEPARTMENT OF NATURAL RESOURCES Division 25-Hazardous Waste Management Commission Chapter 15-Hazardous Substance Environmental Remediation (Voluntary Cleanup Program) 10 CSR 25-15.010 Hazardous Substance Environmental Remediation (Voluntary Cleanup Program) PURPOSE: This rule defines those persons who may apply to the Missouri Department of Natural Resources for oversight of an environmental remediation cleanup in accordance with sections 260.565-260.575, RSMo, and establishes procedures for participation.

- ii. Title 10-MISSOURI DEPARTMENT OF NATURAL RESOURCES Division 24-Hazardous Substance Emergency Response Office Chapter 3-Emergency Notification Procedures 10 CSR 24-3.010 Notification Procedures for Hazardous Substance Emergencies and for Emergency Notification of Releases of Hazardous Substances and Extremely Hazardous Substances. PURPOSE: This rule establishes a statewide emergency telephone number to notify Missouri whenever a hazardous substance emergency occurs and specifies the requirements for emergency notification and follow-up written notices in the event of a hazardous substance emergency, the release of a reportable quantity of a hazardous substance and the release of a reportable quantity of an extremely hazardous substance.

b. Incident History

This section shall be used to record an account of incidents that have occurred at the university, including the following information:

Date	Cause	Amount Released	Resources Impacted	Injuries	Response Actions	Notifications Made

Risk Management has the responsibility of notifying MDNR when a spill has occurred.

ANNEX 5-TRAINING AND EXERCISES/DRILLS

This section shall contain a description of the training exercises conducted at the university for emergency response actions:

Date	Training	Personnel in Attendance	Description of Training
October 31, 2000	Hazardous Material Technician Training-24 hours	John Nelson Jim Brown Robert Hendrix Jason England Tom Nelson	Basic training as required by OSHA for emergency responders
January 10, 2001	SCBA Training	John Nelson Jim Brown Robert Hendrix Jason England Tom Nelson Alan Cook	Cape FD trained the group on the proper use of SCBAs

Risk Management has the responsibility of maintaining training records.

ANNEX 6
RESPONSE CRITIQUE, PLAN REVIEW AND MODIFICATION PROCESS

a. Procedures for modifying the Southeast Missouri State University ICP

- The ICP shall be reviewed annually by Risk Management. Modifications to the ICP shall be drafted based on training response critiques, regulatory changes, and changes within the organizational structure of the university administration.
- All draft modifications shall be submitted to the following individuals for review and comment:
 - Director of Facilities Management
 - Emergency Response Coordinator
 - Chemical Hygiene Officer
- Upon review and acceptance of the proposed modifications, Risk Management shall make the appropriate changes to the ICP document and distribute the revised document to personnel on the ICP distribution list. Record the history of ICP document updates on the following table:

Revision No.	Date	Comment

ANNEX 7-PREVENTION

a. Training

Prevention of emergency situations is the objective the University's safety program. A key part of the safety program is to provide training on the safe handling, use, and disposal of hazardous materials. In addition, safety training is used to build awareness in all university employees on the safety related issues that can affect their health and well-being. Listed below are the safety training elements provided to university employees:

OSHEH REGULATORY TRAINING MATRIX			
TYPE OF TRAINING	AFFECTED AREA	TRAINING INCLUDED	COMMENTS
HAZWOPER TRAINING, EMERGENCY RESPONDER TRAINING, AND REFRESHER	FM, RM, CHO, DPS ¹	HAZWOPER 29CFR1910.120, Hazcom 29CFR1910.1200, Access to Employee Exposure and Medical Records, 29CFR1910.20, Employer Emergency Action 29CFR1910.38, Asbestos Awareness 29CFR1910.1001, DOT General Awareness HM126F	8 hours of training required for Hazwoper Refresher
HAZCOM	FM, RM, CHO, DPS, Faculty, Grad Students	Hazcom 29CFR1910.1200, Access to Employee Exposure and Medical Records, 29CFR1910.20, Employer Emergency Action 29CFR1910.38,	
Hearing Conservation	FM (Power Plant)	29CFR1910.95	
Respiratory Protection	FM, RM, CHO	29CFR1910.134	
Bloodborne Pathogens	FM, RM, CHO, Health and Counseling	29CFR1910.1030	
RCRA	FM, RM, CHO	40CFR262, 264, 265	
Lockout/Tagout	FM, RM	29CFR1910.147	
Confined Space Entry	FM, RM	29CFR1910.146	
Open Flame Permit	FM, RM	29CFR1910.252	
Elevated Work	FM, RM	29CFR Subpart D	
Portable Fire Extinguisher	RM, RM, Faculty, Students	29CFR1910.157	
Emergency Response Team	FM, RM, CHO	29CFR1910.120 (q)ii	
Lab Standard	CHO, RM, students, faculty	29CFR1910.1450	

¹FM = Facility Management
RM = Risk Management
CHO = Science Department Chemical Hygiene Officer
DPS = Department of Public Safety

b. AUDITS, REVIEWS AND SELF-INSPECTIONS

Audits, reviews and self-inspections of the hazardous materials and hazardous waste management activities will be performed as indicated on the table below:

AUDITS, REVIEWS AND SELF-INSPECTIONS		
TYPE	Function	Schedule
Daily inspection Responsible Party: RM	Daily inspection of waste handling areas	Daily
Weekly inspection Responsible Party: RM	Waste storage facility and interim waste storage facilities at point of use	Weekly
Training review Responsible Party: RM	Review of training requirements, attendance records	Annual
Waste Management Plan Review Responsible Party: RM	Review of the University's waste management plan and revisions to plan as necessary	Annual
Science Department Self-Inspection Responsible Party: CHO	Occasional inspections of the science department chemical and waste management activities performed by the CHO	Quarterly
Radiation Program Self Inspection Responsible Party: RSO	Self inspection of Science Department's Radiation Program	Per NRC license
Hazardous Waste Disposal Audit Responsible Party: RM	Audit of university procedures for safe handling and packaging of hazardous wastes.	Annual
Integrated Contingency Plan Audit Responsible Party: RM	Audit on adherence to the ICP plans and readiness for emergency response.	Annual
Chemical Hygiene Plan (CHP) Audit Responsible Party: RM	Audit for compliance with OSHA's Laboratory Standard (29CFR 1910.1450).	Annual
Bloodborne Pathogen-Exposure Control Plan Audit Responsible Party: RM	Audit for compliance with OSHA's Bloodborne Pathogen standard	Annual
Biosafety Plan Audit Responsible Party: RM	Audit for compliance with university's Biosafety Plan	Annual
Radiation Safety Plan Audit Responsible Party: RM	Audit for compliance with university's Radiation Safety Plan	Annual

Specific plans incorporating procedures for the management of hazardous waste and spill control are listed below:

- ***Hazardous Waste Disposal Guide:*** This document contains updated university procedures for safe handling and packaging of hazardous wastes. The procedures are necessary to comply with rules from the regulatory agencies governing hazardous materials. The U.S. Environmental Protection Agency (EPA) and the Missouri Department of Natural Resources (MDNR) regulate disposal of chemical wastes in a cradle-to-grave fashion. The Nuclear Regulatory Commission (NRC) regulates the disposal of radioactive material. The U.S. Department of Transportation (DOT) governs transportation, labeling and packaging of hazardous substances.
- ***Integrated Contingency Plan:*** This plan is a consolidation of multiple plans that facilities may have prepared to comply with various regulations into one functional emergency response plan or integrated contingency plan (ICP). A number of statutes and regulations, administered by several federal agencies, include requirements for emergency response planning. A particular facility may be subject to one or more of the following federal regulations:
 - EPA's Oil Pollution Prevention Regulation (SPCC and Facility Response Plan Requirements)—40 CFR part 112.7(d) and 112.20–21;
 - EPA's Risk Management Programs Regulation—40 CFR part 68;
 - OSHA's Emergency Action Plan Regulation—29 CFR 1910.38(a);
 - OSHA's Process Safety Standard—29 CFR 1910.119;
 - OSHA's HAZWOPER Regulation—29 CFR 1910.120; and
 - EPA's Resource Conservation and Recovery Act Contingency Planning Requirements—40 CFR part 264, Subpart D, 40 CFR part 265, Subpart D, and 40 CFR 279.52. AS PART OF THE CONTINGENCY PLANNING, THE UNIVERSITY WILL DEVELOP AN EMERGENCY RESPONSE TEAM CONSISTING OF UNIVERSITY EMPLOYEES, PROVIDE APPROPRIATE LEVEL OF TRAINING, EQUIPMENT AND MEDICAL MONITORING.
- ***Chemical Hygiene Plan (CHP):*** The CHP is a written guidance document for Southeast Missouri State University compliance with OSHA's Laboratory Standard (29CFR 1910.1450). The purpose of the plan is to define work practices and procedures to help ensure that laboratory workers and employees at Southeast Missouri State University are protected from health hazards associated with hazardous chemicals with which they work.
- ***Bloodborne Pathogen-Exposure Control Plan (ECP):*** The workplace risks associated with human body substances will be effectively communicated to at-risk employees (29CFR1910.1030). Prudent practices and mandatory safety procedures in the ECP will be described in detail. The information will be communicated to the employees in a manner described in the Exposure Control Plan.
- ***Biosafety Plan:*** While this manual is not intended to cover every aspect of biosafety, essential basic procedures, precautions and guidelines are discussed. If basic laboratory practices are performed carefully, along with the appropriate experimental design, workers should have few problems working safely in the lab environment. An awareness and respect for the dangerous nature of certain pathogens should always be maintained.

- ***Toxics Plan:*** PCB and asbestos management
- ***Radiation Safety Plan:*** To be administered by the College of Science and Math.

ANNEX 8 REGULATORY COMPLIANCE AND CROSS-REFERENCE MATRICES

This annex includes information necessary for plan reviewers to determine compliance with specific regulatory requirements. The following matrix tables are included in the annex:

- ICP Development Matrix
- Regulatory Cross-Comparison Matrices

This annex also contains signatory pages that convey University management approval of this ICP.

APPROVALS

DOCUMENT: INTEGRATED CONTINGENCY PLAN- REVISION 0

EMERGENCY MANAGEMENT COORDINATOR

RISK MANAGER

CHEMICAL HYGIENE OFFICER

FACILITIES MANAGEMENT DIRECTOR