## Planning Principles and Perils: A Guide to Effective Planning

#### 1. Minimum Requirements for the Plan

Under the federal law, each LEPC and TEPC is required to develop an emergency response plan and review this plan at least annually thereafter.

In developing this plan, the LEPC and TEPC should evaluate available resources for preparing for and responding to a potential chemical accident, or an act of nature which involves the spillage of chemical releases into the environment.

#### The plan should:

- Identify facilities and transportation routes of EHSs and other hazardous chemicals.
- Identify additional facilities which could be subjected to additional risk due to their proximity to facilities subject to the requirements mentioned above, such as hospitals, nursing homes, schools, prisons or others.
- Describe emergency response procedures for handling chemical releases at a facility, both on-site and off-site.

The following procedures should be followed by facility owners and operators, local emergency responders and medical personnel responding to an incident:

- Designate a community emergency coordinator and facility coordinator(s) to implement the plan.
- Develop reliable, effective and timely notification procedures for facility emergency coordinators to convey information to community emergency coordinators and to the public when a release has occurred.
- Describe methods for determining the occurrence of a release and the probable affected area and population.
- Describe community and private industry equipment available for response operations and identify the persons responsible for the equipment.
- Define training programs for emergency response personnel and the schedules of training for emergency response and medical personnel.
- Present methods and schedules for exercising emergency response plans to emergency responders, emergency medical personnel, fire service and law enforcement agencies.
- The plan thus developed shall be reviewed at least once a year, or more often as circumstances within the community or facilities changes.

### 2. Reviewing and Testing the LEPC and TEPC Emergency Response Plan ("Plan")

The LEPC and TEPC plan is required to be reviewed at least once a year. Most planners agree the best way to review a plan is to test, or exercise, it. There is no requirement the plan must be tested each year; however, the LEPC is required to establish a schedule for testing the plan.

Each LEPC and TEPC, in conjunction with the emergency management office, should determine the level of review and exercise to be conducted each year. In testing the plan, the following areas should be evaluated to represent the minimum requirements for qualification as an exercise.

In addition, jurisdictions are encouraged to test areas particular to their part of the plan. Reviewers of the plan should examine the plan for the following items:

- Does the plan attempt to reduce the unknown in a situation?
- Are the aims of the plan to evoke appropriate actions?
- Is the plan based on what is likely to happen?
- Are the basic tenets of the plan based on knowledge of actual problems and solutions, or upon myths and misconceptions?
- Does the plan operate as a continuous process?
- Does the plan focus on principles rather than concrete details?
- Does the plan overcome resistance in thinking and established methods of response because of limitations of money, time and effort?
- What parts of the plan are an educational activity?

#### 3. Characteristics of a Good Plan

A good plan should have the following characteristics:

- It is simple.
- It provides for accomplishing the mission.
- It is flexible.
- It is based on facts and solid assumptions.
- It provides for continuity.
- It provides for the use of existing resources.
- It delegates authority while maintaining necessary control.
- It provides for the necessary organization.
- It coordinates all elements of the response.
- It establishes relationships and responsibilities.

#### 4. Common Pitfalls in the Planning Process

- Lack of integration of emergency planning into the facility's total management system.
- Lack of understanding about the different dimensions of emergency planning.
- Managers not involved.
- Top management inflexibility.
- Top management expects immediate results from the planning process.
- Confusing financial projects.
- Planning responsibility wrongly placed in a separate department rather than coordinated through several departments.
- Too much is attempted too soon.
- Failure to operate by the planning process action plan.
- Lack of broad input into the planning process.
- Failure to see the big picture.

#### 5. The Top Ten Common Weaknesses of Disaster Planning

- No systematic collection of information.
- No systematic dissemination of information.
- No provision for establishing on-scene command or management.
- Not able to achieve inter-organizational coordination.
- Specific responsibilities are not described.
- Incomplete hazard assessment and analysis.
- The plan is not exercised.
- No provision for updating or revising the plan.
- No concern for the users of the plan.
- Plan is not distributed to agencies involved.

#### 6. Warning Signs of Insufficient Preparedness

- A lack of urgency or priority about emergency planning among management and employees.
- Confusion about roles and commitment to emergency planning.
- Confusion about community roles and responsibilities regarding disaster planning.
- Lack of a viable disaster plan that is part of the daily facility process.

# Appendix J. Sample Facility EPCRA Section 302 Planning Letter Submitted to SERC/TERC, LEPC/TEPC

As required under EPCRA Section 302(c), if the facility acquires a new EHS at or above its TPQ, the facility is required to notify their SERC/TERC and LEPC/TEPC within 60 days.

LEPCs and TEPCs may ask facilities in their planning district to fill out this template for notifying them and the SERC or TERC if the facility is subject to emergency planning notification.

[Facility Letterhead]
[SERC or TERC Address]
[ LEPC or TEPC Address]
To the SERC or TERC /LEPC or TEPC Information Coordinators:
This is the emergency planning notification required under Section 302 of the Emergency Planning and Community Right-to-Know Act for the following facility:
NAME OF FACILITY
ADDRESS OF FACILITY
CITY, STATE, ZIP
This facility stores or uses the following Extremely Hazardous Substances on-site above the threshold planning quantity as specified in 40 CFR Part 355:
CAS #, CHEMICAL NAME, QUANTITY (in pounds)
1
2
3
4
5

6	
7	
8	
f additional emergency planning information for this facility is necessary, please contact our	
Facility Emergency Coordinator,, at	
(phone) or (email).	
incerely,	
Owner/Operator of Facility	