



National Park Service Commercial Services Program Emergency Planning & Reporting



Purpose of Emergency Planning

Emergency planning aims to ensure that hazardous substance spills and releases are mitigated quickly and efficiently to protect the environment and human health. The Environmental Protection Agency (EPA) and the U.S. Occupational Safety and Health Administration have established regulations to address planning for general emergencies, responding to emergency releases, and tracking and reporting types and amounts of hazardous substances maintained onsite or released into the environment.

Emergency Action Plans (EAPs)

Concession operations must have a written EAP addressing emergency procedures for employees that includes:

- Procedures for reporting a fire or other emergency
- Procedures for emergency evacuation and exit route assignments (for example, an active shooting situation)
- Procedures to be followed by employees who remain to complete critical operations before evacuating
- Procedures to account for all employees after evacuation
- Procedures to be followed by employees performing rescue or medical duties
- The name and contact information of every employee who may be contacted by employees for more information about the plan or an explanation of their duties under the plan

The EAP must be:

- Maintained in the workplace and available for employees to review
- Reviewed with each employee when it is developed, when the employee is assigned to the job, when employee responsibilities change, or when the EAP is changed

Emergency Response Planning

A written emergency response plan (ERP) must be in place and include applicable procedures, such as:

Communication	Roles and lines of authority
Coordination with emergency responders	Decontamination procedures
First Aid	Preventative measures
Training	Site security and control measures

Responsibility

Management should determine a response policy for their operations based on potential spills and site factors, such as:

- The type of spill:
 - Incidental
 - Non-incidental)
- Size of spill
- The availability of outside emergency response teams, such as the local fire department

Spill Types

Incidental Spills: The release of a hazardous substance where only minor safety or health hazards exist, and where the substance can be safely absorbed, neutralized, or controlled in a timely manner.

Non-Incidental Spills: An occurrence which results in an uncontrolled release of a hazardous substance where there is a potential safety or health hazard. It also requires a response effort from outside the immediate release area by designated responders.

Training Requirements

Appropriate level of training is based on expected employee responsibility.

- Employees likely to witness or discover a non-incident release of hazardous substances are trained to report only.
- Employees responding to spills of hazardous material in a defensive fashion must have at least 8 hours of Hazardous Waste Operations and Emergency Response (HAZWOPER) training.
- Employees responsible for stopping the release must have at least 24 hours of HAZWOPER.
- An annual refresher training is required for employees who respond to releases.

Small Quantity Generator of Hazardous Waste Requirements

- Facilities must meet maintenance requirements to minimize the possibility of fire, explosion, or releases.
 - Facilities must be equipped with an internal communication or alarm system, a telephone or radio, portable fire extinguishers, and other fire suppression systems.
 - There must be aisle spacing requirements in areas where hazardous waste is stored.
 - Required emergency contact information must be posted in a conspicuous area.
 - An emergency coordinator must always be either on the premises or able to reach the facility in a short period of time (less than 15 minutes).
- * States with an authorized hazardous waste program may have more stringent requirements.
- * There are additional emergency planning requirements for Large Quantity Generators.



Emergency Planning and Community Right-to-Know-Act Reporting:

- Concessioners must notify their local emergency planning committee (LEPC), state emergency response commission (SERC), and the park emergency planning committee if they store amounts of extremely hazardous substances (EHS) in excess of the threshold planning quantity (TPQ) in their facilities.
- A designated concessioner representative (usually the safety officer) must participate in the park emergency planning process as the emergency response coordinator. The park must be notified of any changes relevant to the concessioner's emergency planning, and vice versa.
- If there is a release of an EHS above the reportable quantity, facilities must notify the park, SERC, LEPC, and local fire department.
- Tier II reports must be submitted annually to the park, SERC, LEPC, and local fire department by March 1 of each year.
- Toxics Release Inventory forms must be submitted to EPA by July 1 of each year.

Please note, this fact sheet does not cover all requirements and situations related to emergency planning and reporting. In addition to checking federal regulations, be sure to check your state and local regulations. For any operational questions or emergency situations, please contact your park concession specialist. For more information pertaining to compliance with emergency planning and reporting requirements, please email cs_envaudits@nps.gov or contact the applicable regulatory authority.