APPENDIX G

COMPARISON OF OTHER ENVIRONMENTAL PLANS

POTENTIALLY RELEVANT ELEMENTS OF OTHER FACILITY ENVIRONMENTAL PLANS

Required Elements of Each Plan	Storm Water Pollution Prevention Plan	Preparedness Prevention and Contingency Plan (40 CFR 264 and 265)	Spill Control and Countermeasures (40 CFR 112)	NPDES Toxic Organic Management Plan (40 CFR 413, 433, 469)	OSHA Emergency Action Plan (29 CFR 1910)
Identification of Pollutants of Concern	• Description of potential pollutant sources • Risk identification • Material inventory • Test for illicit connections	• Requires identification of hazardous wastes handled at the facility and associated hazards	• Requires prediction of direction, rate of flow and total quantity of oil that could be discharged	• Requires identification of toxic organic compounds used	• Requires list of major workplace fire and emergency hazards
Coordinator	• Pollution prevention planner or team under supervision of plant manager	• Emergency coordinator at facility or on call at all times to coordinate emergency response.	• Designated person who is accountable for oil spill prevention and who reports to line management	Not specifically addressed	Not specifically addressed
Operational Controls	• Preventive maintenance program • Good housekeeping • Spill prevention and response procedures • Site-specific storm water BMPs • Activity-specific BMPs	• Requires that personnel involved in hazardous waste activities have access to emergency communication device	• Requires appropriate spill prevention and containment procedures	• Requires method of disposal used instead of dumping into drain be specified • Procedures for assuring that toxic organics do not routinely spill or leak into wastewater	• Requires employer to control accumulations of flammable and combustible waste • Maintain equipment and systems to prevent accidental ignition of combustible materials
Structural Controls	• Sediment and erosion control • Site-specific storm water BMPs • Activity-specific BMPs • BMPs for non-storm water discharges • Enclosure of salt storage piles • *Provide containment, drainage control, and/or diversionary structures to prevent contamination of storm water discharges associated with industrial activity from facilities subject to EPCRA Section 313* • *Security for EPCRA Section 313 facilities*	• Maintain aisle space for movement of emergency equipment and personnel • Specific requirements for storage tanks	• Appropriate containment and/or diversionary structures or equipment (detailed suggestions provided in reg.) • Security - including fences and gates, locks for flow and drain valves and pumps, and lighting	• Specify method of disposal used instead of dumping into drain • Procedures for assuring that toxic organics do not routinely spill or leak into wastewater	Not specifically addressed

POTENTIALLY RELEVANT ELEMENTS OF OTHER FACILITY ENVIRONMENTAL PLANS (Continued)

Required Elements of Each Plan	Storm Water Pollution Prevention Plan	Preparedness Prevention and Contingency Plan (40 CFR 264 and 265)	Spill Control and Countermeasures (40 CFR 112)	NPDES Toxic Organic Management Plan (40 CFR 413, 433, 469)	OSHA Emergency Action Plan (29 CFR 1910)
Inspections	• Routine visual inspection of designated equipment and plant areas, including materials handling, by qualified plant personnel who will also develop procedures to ensure follow up • Annual site inspection to verify the accuracy of pollutant source description, drainage map and controls	Not specifically addressed	• Testing and inspection of pollution prevention/control equipment by owner/operator on a scheduled, periodic basis • Inspections should be in accordance with written procedures developed for the facility by the owner/operator	Not specifically addressed	Not specifically addressed
Employee Training	• Training for employee at all levels in: - spill response - good housekeeping - materials management • Specify periodic training dates in plan	Not specifically addressed	• Owners/operators are responsible for properly training personnel on applicable regulations and in the operation and maintenance of equipment to prevent discharges • Owners/operators should schedule and conduct spill prevention briefings for operating personnel	Not specifically addressed	• Designate and train a sufficient number of persons to assist in safe evacuation
Coordinate with Local Authorities	• Facilities which discharge storm water to large or medium municipal separate storm sewer systems must comply with applicable conditions in municipal storm water management programs	• Familiarize local police and fire departments, hospitals and emergency response teams - layout of facility - properties of hazardous wastes - types of injuries • Coordinate arrangements for plan implementation authorities	• Follow contingency plan provisions of 40 CFR 109 including consultation with State and local governments	Not specifically addressed	Not specifically addressed

POTENTIALLY RELEVANT ELEMENTS OF OTHER FACILITY ENVIRONMENTAL PLANS (Continued)

Required Elements of Each Plan	Storm Water Pollution Prevention Plan	Preparedness Prevention and Contingency Plan (40 CFR 264 and 265)	Spill Control and Countermeasures (40 CFR 112)	NPDES Toxic Organic Management Plan (40 CFR 413, 433, 469)	OSHA Emergency Action Plan (29 CFR 1910)
Emergency/ Spill Response Equipment	• Necessary equipment to implement a spill clean up	• List describing emergency equipment and its location: - Internal communications (intercom or alarm) - Immediately accessible line of communication to summon emergency assistance (fire/police) - fire extinguishers - water supplies - decontamination equipment - spill control equipment • All equipment must be tested and maintained	• Appropriate containment and/or diversionary structures or equipment • If impractical, a written commitment of equipment and materials required to expeditiously control and remove any harmful quantities of oil discharged	Not specifically addressed	• Alarm system

APPENDIX G

COMPARISON OF OTHER ENVIRONMENTAL PLANS

POTENTIALLY RELEVANT ELEMENTS OF OTHER FACILITY ENVIRONMENTAL PLANS

Required Elements of Each Plan	Storm Water Pollution Prevention Plan	Preparedness Prevention and Contingency Plan (40 CFR 264 and 265)	Spill Control and Countermeasures (40 CFR 112)	NPDES Toxic Organic Management Plan (40 CFR 413, 433, 469)	OSHA Emergency Action Plan (29 CFR 1910)
Identification of Pollutants of Concern	• Description of potential pollutant sources • Risk identification • Material inventory • Test for illicit connections	• Requires identification of hazardous wastes handled at the facility and associated hazards	• Requires prediction of direction, rate of flow and total quantity of oil that could be discharged	• Requires identification of toxic organic compounds used	• Requires list of major workplace fire and emergency hazards
Coordinator	• Pollution prevention planner or team under supervision of plant manager	• Emergency coordinator at facility or on call at all times to coordinate emergency response.	• Designated person who is accountable for oil spill prevention and who reports to line management	Not specifically addressed	Not specifically addressed
Operational Controls	• Preventive maintenance program • Good housekeeping • Spill prevention and response procedures • Site-specific storm water BMPs • Activity-specific BMPs	• Requires that personnel involved in hazardous waste activities have access to emergency communication device	• Requires appropriate spill prevention and containment procedures	• Requires method of disposal used instead of dumping into drain be specified • Procedures for assuring that toxic organics do not routinely spill or leak into wastewater	• Requires employer to control accumulations of flammable and combustible waste • Maintain equipment and systems to prevent accidental ignition of combustible materials
Structural Controls	• Sediment and erosion control • Site-specific storm water BMPs • Activity-specific BMPs • BMPs for non-storm water discharges • Enclosure of salt storage piles • *Provide containment, drainage control, and/or diversionary structures to prevent contamination of storm water discharges associated with industrial activity from facilities subject to EPCRA Section 313* • *Security for EPCRA Section 313 facilities*	• Maintain aisle space for movement of emergency equipment and personnel • Specific requirements for storage tanks	• Appropriate containment and/or diversionary structures or equipment (detailed suggestions provided in reg.) • Security - including fences and gates, locks for flow and drain valves and pumps, and lighting	• Specify method of disposal used instead of dumping into drain • Procedures for assuring that toxic organics do not routinely spill or leak into wastewater	Not specifically addressed

POTENTIALLY RELEVANT ELEMENTS OF OTHER FACILITY ENVIRONMENTAL PLANS (Continued)

Required Elements of Each Plan	Storm Water Pollution Prevention Plan	Preparedness Prevention and Contingency Plan (40 CFR 264 and 265)	Spill Control and Countermeasures (40 CFR 112)	NPDES Toxic Organic Management Plan (40 CFR 413, 433, 469)	OSHA Emergency Action Plan (29 CFR 1910)
Inspections	• Routine visual inspection of designated equipment and plant areas, including materials handling, by qualified plant personnel who will also develop procedures to ensure follow up • Annual site inspection to verify the accuracy of pollutant source description, drainage map and controls	Not specifically addressed	• Testing and inspection of pollution prevention/control equipment by owner/operator on a scheduled, periodic basis • Inspections should be in accordance with written procedures developed for the facility by the owner/operator	Not specifically addressed	Not specifically addressed
Employee Training	• Training for employee at all levels in: - spill response - good housekeeping - materials management • Specify periodic training dates in plan	Not specifically addressed	• Owners/operators are responsible for properly training personnel on applicable regulations and in the operation and maintenance of equipment to prevent discharges • Owners/operators should schedule and conduct spill prevention briefings for operating personnel	Not specifically addressed	• Designate and train a sufficient number of persons to assist in safe evacuation
Coordinate with Local Authorities	• Facilities which discharge storm water to large or medium municipal separate storm sewer systems must comply with applicable conditions in municipal storm water management programs	• Familiarize local police and fire departments, hospitals and emergency response teams - layout of facility - properties of hazardous wastes - types of injuries • Coordinate arrangements for plan implementation authorities	• Follow contingency plan provisions of 40 CFR 109 including consultation with State and local governments	Not specifically addressed	Not specifically addressed

POTENTIALLY RELEVANT ELEMENTS OF OTHER FACILITY ENVIRONMENTAL PLANS (Continued)

Required Elements of Each Plan	Storm Water Pollution Prevention Plan	Preparedness Prevention and Contingency Plan (40 CFR 264 and 265)	Spill Control and Countermeasures (40 CFR 112)	NPDES Toxic Organic Management Plan (40 CFR 413, 433, 469)	OSHA Emergency Action Plan (29 CFR 1910)
Emergency/ Spill Response Equipment	• Necessary equipment to implement a spill clean up	• List describing emergency equipment and its location: - Internal communications (intercom or alarm) - Immediately accessible line of communication to summon emergency assistance (fire/police) - fire extinguishers - water supplies - decontamination equipment - spill control equipment • All equipment must be tested and maintained	• Appropriate containment and/or diversionary structures or equipment • If impractical, a written commitment of equipment and materials required to expeditiously control and remove any harmful quantities of oil discharged	Not specifically addressed	• Alarm system

POTENTIALLY RELEVANT ELEMENTS OF OTHER FACILITY ENVIRONMENTAL PLANS (Continued)

Required Elements of Each Plan	Storm Water Pollution Prevention Plan	Preparedness Prevention and Contingency Plan (40 CFR 264 and 265)	Spill Control and Countermeasures (40 CFR 112)	NPDES Toxic Organic Management Plan (40 CFR 413, 433, 469)	OSHA Emergency Action Plan (29 CFR 1910)
Notification/ Record Keeping Procedures	• Record spills and other discharges • Record storm water quality/ quantity information • Document inspection and maintenance activities • Certify that discharge has been tested for the presence of non-storm water discharges or certify where such testing is not feasible	• In case of imminent or actual emergency situation: - activate alarms/ communication systems to notify facility personnel - notify State/local agencies - identify the character, exact source, amount and areal extent of release - assess hazards to human health and the environment and respond - facilitate containment - coordinate clean up - submit incident report	• Written procedures for and records of inspections should be made part of the SPCC and maintained for 3 years • Detailed notification requirements apply if a facility has a single spill event of more than 1000 gallons of oil or has discharged oil in harmful quantities in two spill events within the last 12 months	Not specifically addressed	• Means of reporting fires and other emergencies
Evacuation Procedures	Not specifically addressed	• Evacuation plan describing: - signals to begin evacuation - primary and alternate routes	Not specifically addressed	Not specifically addressed	• Emergency escape routes • Procedures to account for all employees • Procedures for employees who remain behind to perform critical functions

POTENTIALLY RELEVANT ELEMENTS OF OTHER FACILITY ENVIRONMENTAL PLANS (Continued)

Required Elements of Each Plan	Storm Water Pollution Prevention Plan	Preparedness Prevention and Contingency Plan (40 CFR 264 and 265)	Spill Control and Countermeasures (40 CFR 112)	NPDES Toxic Organic Management Plan (40 CFR 413, 433, 469)	OSHA Emergency Action Plan (29 CFR 1910)
Plan Location/ Distribution	• Maintained at facility unless requested by the director or the municipal operator	• Maintained at facility • Submitted to local police, fire, hospital, and State and local emergency response teams	• Maintain at facility if facility is normally attended at least 8 hours per day or at nearest field office if not so attended	• Submitted to permitting authority for approval	• Plan shall be written and kept at the workplace unless there are fewer than 10 employees, then oral communication is sufficient • Employer shall review the plan with each employee covered by the plan when: - Plan is initially developed - Plan changes - Employee's responsibility changes
Modification of Plan	• Plan fails to control pollutants in storm water • Change in design, construction, operation or maintenance • Requested by the director	• Facilty permit revised • Plan fails during emergency • Facility changes • Emergency coordinator(s) change • Emergency equipment changes	• By the Regional Adminstrator where the plan does not meet requirements or is necessary to prevent and contain discharges of oil • By the owner/operator: - change in facility - if warranted by findings of 3 years evaluation	Not specifically addressed	Not specifically addressed

POTENTIALLY RELEVANT ELEMENTS OF OTHER FACILITY ENVIRONMENTAL PLANS (Continued)

Required Elements of Each Plan	Storm Water Pollution Prevention Plan	Preparedness Prevention and Contingency Plan (40 CFR 264 and 265)	Spill Control and Countermeasures (40 CFR 112)	NPDES Toxic Organic Management Plan (40 CFR 413, 433, 469)	OSHA Emergency Action Plan (29 CFR 1910)
Certification	• Certify that discharges have been tested for the presence of non-storm water discharges • Plans must be signed and certified in accordance with 40 CFR 122.22 • *Spill prevention and response plan for facilities subject to EPCRA Section 313 must be reviewed and certified every three years by a registered professional engineer*	Not specifically addressed	• Plan must be reviewed and certified by a registered professional engineer	No dumping of toxic organic compounds into the wastewater has occurred and the approved TOMP is being implemented	Not specifically addressed