

2016

Kentucky Emergency
Response Commission
(KERC)

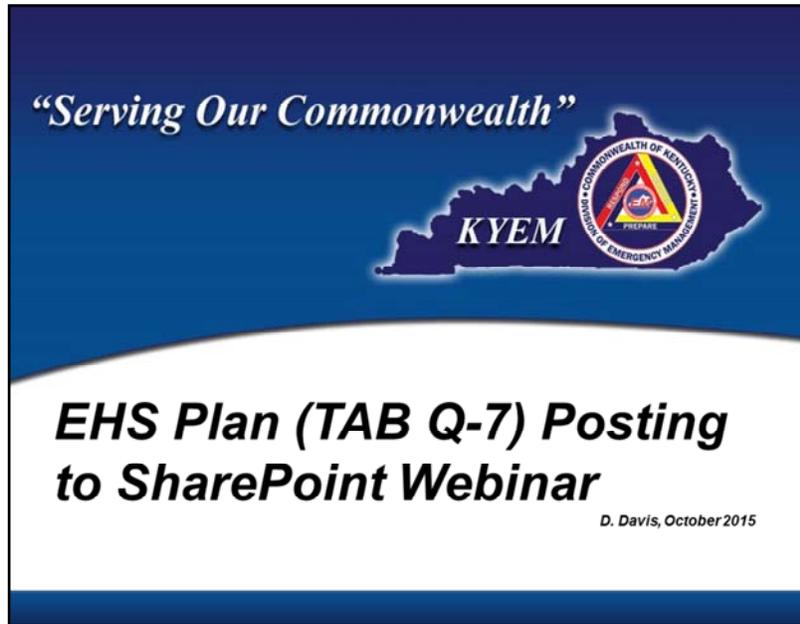
Kentucky Emergency
Management (KYEM)



EHS FACILITY PLAN POSTING TO SHAREPOINT: COURSE MANUAL

This course is designed to provide students with an understanding of the basic background regarding LEPC requirements for EHS Facility Plans (formerly known in Kentucky as TAB Q-7s). Additionally this course will highlight KERC requirements for LEPCs to post all approved EHS Facility plans to their county SharePoint folder; KERC Policy 001-2015.

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LEPC Courses: The Kentucky Emergency Response Commission (KERC) Local Emergency Planning Committee (LEPC) Courses consist of:

LEPCs in Kentucky: Module 1 An introductory look at Local Emergency Planning Committee (LEPC), the laws and regulations that govern them, and an LEPCs importance in providing the community – its citizens and its leaders – with needed information that will better prepare them in the event of a chemical emergency.

LEPC Grant Applications: Module 2 This course is designed to provide active LEPC members with an understanding of the state requirements for LEPC grant funding (KRS and KAR), including a detailed review of all the documentation and forms LEPCs are required to submit to the KERC or their designees.

The EPA’s Tier2Submit20xx: Module 2A This course is designed to provide active LEPC members with an understanding of the process of how facilities complete an electronic tier2 report using the EPA’s Tier2Submit20xx Software. It is recommended that **ALL** members of the LEPC have the Tier2Submit20xx software on their computer. This will allow access to: A) **ALL** facility addresses within the district, B) a complete list of contact information for **EVERY** facility in the district, and C) a complete list of **EVERY** chemical within the district.

Emergency Response Planning for EHS Facilities: Module 3 This course is designed to provide active LEPC planners with an understanding of the federal (EPCRA) and state (KRS and KAR) requirements for Hazardous Materials (HAZMAT) emergency response plans (formerly known in Kentucky as TAB Q-7s).

Tier2 / EHS Facility Plan Validating Exercise: Module 4 Includes the final culminating activity; a Tier2 / EHS Facility Plan Validating Exercise. This course is designed to provide active LEPC members with an understanding of the relationship between Tier2 reporting and EHS Facility plans and how both can be utilized to ensure the LEPC is fulfilling its EPCRA and KRS planning requirements.

Community Right-To-Know – Coordinating Public Information: Module 5 This course is designed to provide active LEPC members with a wide range of best practices and options for fulfilling ALL of the EPCRA requirements regarding educating and preparing the public for a HAZMAT incident.



Unit 1: Course Overview

This webinar is designed to provide LEPC personnel with the basic background regarding LEPC requirements for EHS Facility Plans. Additionally this course will highlight KERC requirements for LEPCs to post all approved EHS Facility plans to their county SharePoint folder; KERC Policy 001-2015.

Local communities, in partnership with government and industry can, through a comprehensive approach, minimize the effects from chemical incidents with a thorough planning process. The LEPC is vital in providing the community, its citizens and its leaders, with complete emergency response plans that will mitigate the effects of a chemical incident.

This course is a detailed
Discussion Questions:

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 "Serving Our Commonwealth"

Course Purpose

This course is designed to provide active LEPC members with an understanding of the KERC SharePoint Posting Policy Requirements.



The roots of education are bitter, but the fruit is sweet. - Aristotle

Course Purpose

This course is designed to provide LEPC members, specifically all members with an active role in the preparation, review, and approval of EHS Facility Emergency Response Plans with an understanding of the KERC SharePoint Posting Policy Requirements.

Discussion Questions:

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Target Audience?

The target audience for this course are members of the LEPCs who participate in the EHS Facility Emergency Response planning process.

Who can / should be involved in the LEPC Planning Process?



Target Audience

The target audience for this course are members of the LEPCs who participate in the EHS Facility Emergency Response planning process specifically those members with an active role in the preparation, review, and approval of EHS Facility Emergency Response Plans.

Who can / should be involved in the LEPC Planning Process?

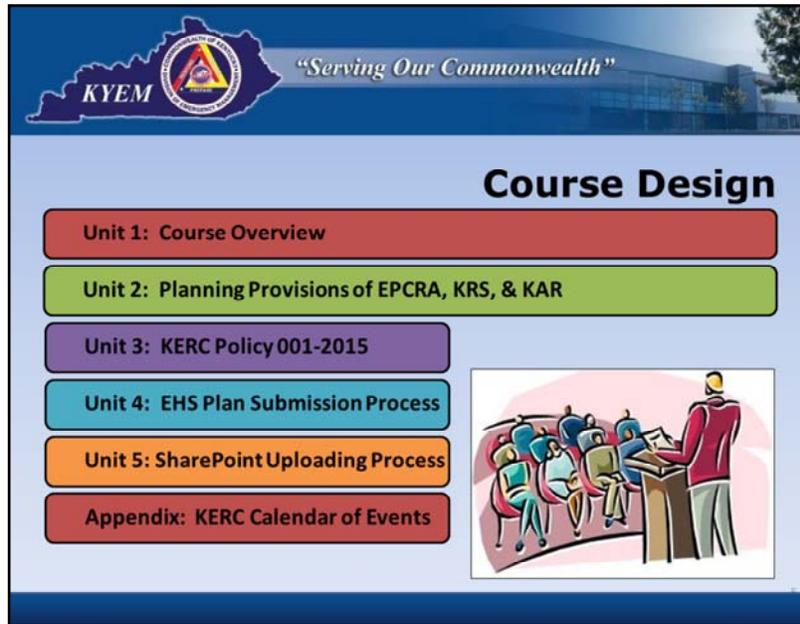
Listed in no particular order:

- The LEPC Chair
- All members of the LEPC
- Representatives of Special Facilities
- Representatives from the local school district
- Facility personnel
- First Responders
- Local Elected Officials and government personnel
- Any private citizens with an interest in Community Awareness and Emergency Preparedness

Can you identify others?

Discussion Questions:

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Course Design

Unit 1: Course Overview

Unit 2: Planning Provisions of EPCRA, KRS, & KAR

Unit 3: KERC Policy 001-2015

Unit 4: EHS Plan Submission Process

Unit 5: SharePoint Uploading Process

Appendix: KERC Calendar of Events

Course Objectives

The course objectives: after completing this manual you should be able to:

- Understand the KERC requirements found within KERC policy 001-2015
- Describe the submission process for submitting an EHS Facility plan to the KERC for approval
- Identify all the documents required in a complete, KERC approved, EHS Facility Plan
- Describe the process for uploading an EHS Facility Plan to the County SharePoint folder



Course Logistics

Please sign in and provide an e-mail address.

Note: Course certificates will be sent to address on sign-in sheets. Course instructors are not responsible for incorrect or illegible addresses.

Housekeeping Issues

- Breaks
- Cell Phones on Vibrate
- Location of Restrooms
- Location of Emergency Exits
- Other Concerns (Instructor and/or Student)

Discussion Questions:

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KYEM "Serving Our Commonwealth"

Class Expectations

Participate

Ask Questions

Respect Other's Opinions

Return on Time From Breaks

Class Expectations

All class participants are expected to:

- Participate
- Ask Questions
- Respect Other's Opinions
- Return from breaks on time!
- Other Concerns (Instructor and/or Student)

Discussion Questions:

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KYEM "Serving Our Commonwealth"

Introductions

INSTRUCTOR	STUDENT
Name	Name
Title	LEPC Name (County)
Organization	Personal or professional interest in LEPC.
Professional Experience	Importance of LEPC

You can't base your life on other people's expectations. - Stevie Wonder

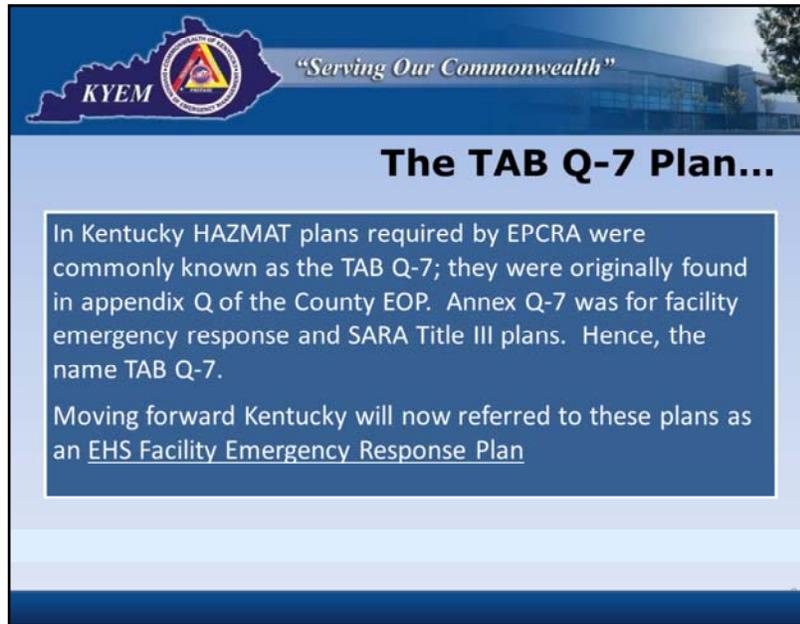
Introductions

Your instructor(s) will introduce themselves and provide you with information about their background and experience with LEPCs.

You will be asked to introduce yourselves and provide information on your background, your experience with LEPCs, why you wanted to participate in the class, and what you think is the most important thing your LEPC does or can do.

Discussion Questions:

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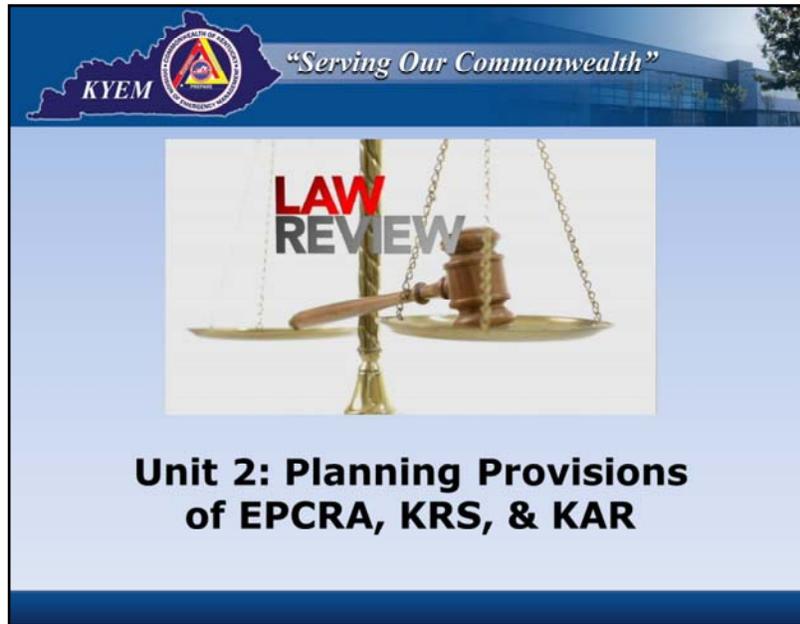
The TAB Q-7 Plan...

Is now referred to as an EHS Facility Emergency Response Plan.

The LEPC planning envisioned by the Environmental Protection Agency (EPA) for a Hazardous Materials incident, was intended to complement the existing planning that state law already required, instead of creating a separate process. The LEPC did not develop a separate plan, but carried out the emergency planning requirements related to hazardous materials by adding a hazardous materials annex. In this way, the LEPC is an important resource useful to all local responders.

In Kentucky these plans were formerly known as TAB Q-7's. The plans were originally found in appendix Q of the County Emergency Operations Plan. Annex Q-7 was for facility emergency response and SARA Title III plans and were contained in TAB Q-7 of the annex. Hence, the name TAB Q-7 was applied in Kentucky to all Extremely Hazardous Substance (EHS) plans required under SARA Title III.

Moving forward Kentucky will now refer to these plans as an **EHS Facility Emergency Response Plan**



Unit 2: Planning Provisions of EPCRA, KRS, & KAR

In this unit we will briefly review the planning requirements found within EPCRA, KRS, and KAR. We will look at the requirements from the perspective of both the LEPC and the facility.

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Section 303: LEPC Planning

- Require LEPCs to prepare chemical emergency response plans for all facilities with an EHS chemical above TPQ.
- Contains nine (9) planning requirements
- Plans must be reviewed by the:
 - ✓ SERC
 - ✓ LEPC annually



EPCRA SEC. 303 Comprehensive Emergency Response Plans.

LEPC Planning Requirements

EPCRA Section 303 established that each **LEPC shall complete preparation of an emergency plan and review the plan, at minimum, once a year.** EPCRA requires each emergency plan shall include, but is not limited, to each of the following:

- Identification of facilities, identification of routes likely to be used for the transportation of EHSs, and identification of additional facilities contributing or subjected to additional risk due to their proximity to the facility, such as hospitals or natural gas facilities
- Methods and procedures to be followed by facility owners and operators and local emergency and medical personnel to respond to any release of such substances
- Designation of a community emergency coordinator and facility emergency coordinators (FERC), who shall make determinations necessary to implement the plan
- Procedures providing reliable, effective, and timely notification by the FERC and the community emergency coordinator to persons designated in the emergency plan, and to the public, that a release has occurred
- Methods for determining the occurrence of a release, and the area or population likely to be affected by such release
- A description of emergency equipment in the community and at each facility and an identification of the persons responsible for equipment
- Evacuation plans, including provisions for a precautionary evacuation and alternative traffic routes
- Training programs, including schedules for training of local emergency response and medical personnel
- Methods and schedules for exercising the emergency plan

After completion of an emergency plan, the LEPC shall submit a copy of the plan to the SERC for review and recommendations.

Discussion Questions:

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Legal References: EPCRA Section 303



Section 303: Facility Planning Requirements

Time Frame:	30 Days	Promptly	Upon Request & Within 60 Days
Facility Action:	Identify a facility representative who will participate in the emergency planning process as a FERC. (Echoed in KRS 39E.130)	Inform LEPC of changes occurring at facility	Provide information necessary for developing a EHS Facility Plan (Echoed in KRS 39E.220)

Section 303: Facility Planning Requirements

EHS facilities must:

- Identify, within thirty (30) days the name of a **facility representative (FERC) who will work with the LEPC in the development of emergency plans**, and that person shall provide information necessary to the development of those plans.
- Promptly inform the LEPC of any relevant changes occurring at facility as such changes occur or are expected to occur.
- Upon request of the SERC or LEPC, EHS facilities must provide additional information necessary for developing and implementing the emergency plan about each substance to include, but not be limited to, material safety data sheets.

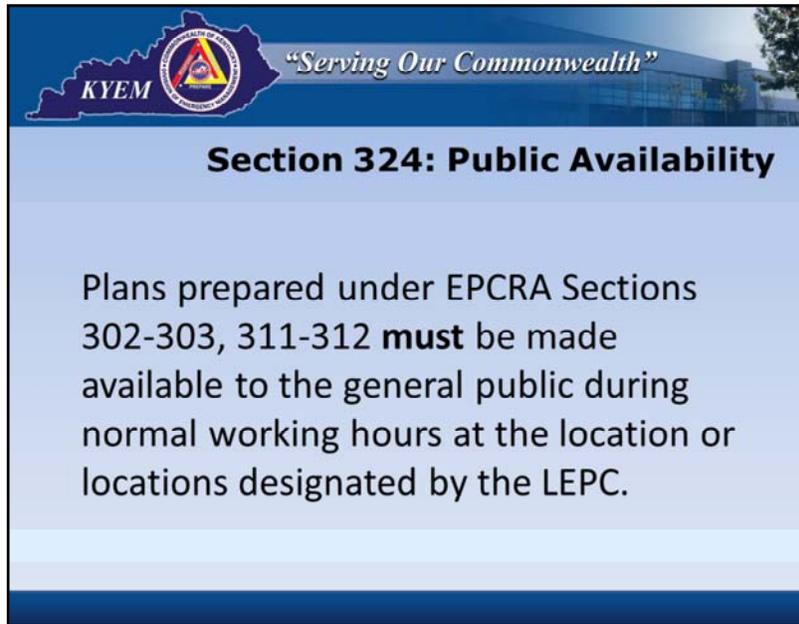
Discussion Questions:

Would it be advantageous to utilize Tier2 reporting requirements and invite FERCs to join & attend LEPC meetings using the email provided in the contact information.

Xxx

Xxx

Legal References: EPCRA 303, Echoed in KRS 39E.130, KRS 39E.220, & 106 KAR 1.081



Section 324: Public Availability of Plans, Data Sheets, Forms, and Follow-up Notices.

Public Availability

Information collected and Plans prepared under EPCRA Sections 302-303, 311-312 must be made available to the general public, consistent with section 322, during normal working hours at the location or locations designated by the SERC, or LEPC. This includes:

- EHS Facility Emergency Response Plan
- Individual MSDS or SDS
- Hazardous Chemical list
- Tier2 inventory form
- Toxic Chemical Release Forms
- Written Follow-up Emergency Notifications

Upon request by an **owner or operator** of a facility subject to the requirements of section 312, the SERC and the LEPC shall withhold from disclosure under this section the location of any specific chemical on a Tier2 inventory form.

Discussion Questions:

Legal References: EPCRA Section 324



KRS 39E.150 Plan Development, Approval, & Review

Plans developed under the guidance of the SERC shall be a part of the local EOP. These plans shall emphasize a coordinated response by all local emergency response organizations.

If, in the judgment of the SERC, the local plan is inadequate, or is inconsistent with the Kentucky EOP, the local plan shall be returned to the LEPC and the committee shall revise the plan until approved by the SERC.

LEPCs shall annually review and update, where appropriate, each plan and submit revisions to the SERC.

Discussion Questions:

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Legal References: KRS 39E.150



KAR 1.081 FACL

Each March 1 any facility that has an EHS in excess of the TPQ shall review the EHS Facility Emergency Response Plan and send a Facility Annual Certification Letter (FACL) to the LEPC stating that:

- There were no changes and therefore the plan is correct as is; or
- The plan has been revised and the revisions are included with the FACL.

106 KAR 1:081. Kentucky Emergency Response Commission Tier2 Reporting and Fee Schedule Requirements -- EHS Facility Planning Participation Requirements.

Facility Annual Certification Letter (FACL)

Section 4(1) In accordance with the planning requirements of KRS no later than sixty (60) days after a facility notifies the KERC that it is subject to the requirements of this section, the facility shall provide emergency response planning information to the LEPC and shall assist the LEPC in developing an EHS Facility Emergency Response Plan for all EHSs in accordance with the "Emergency Response Planning Guide for EHS Facilities".

Section 4(2) After initial submission and approval of the EHS Facility Emergency Response Plan, each **March 1** any facility that has an EHS in excess of the TPQ shall review the EHS Facility Emergency Response Plan and **send a Facility Annual Certification Letter (FACL)** to the LEPC stating that there were no changes and therefore the EHS Facility Emergency Response Plan is correct as is; or the EHS Facility Emergency Response Plan has been revised and the revisions are included with the FACL.

Section 4(3) A Category Five Facility which is deemed exempt under SARA Title III Section 311(e) and therefore not subject to the annual chemical inventory reporting requirement shall comply with Section 4 (1) and (2) of this administrative regulation and shall file the fee in accordance with Section 3 of this administrative regulation.

Facilities, at minimum, should be familiar with 106 KAR 1.081, as it dictates how they are to participate in the planning process with the LEPC.

Discussion Questions:

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KAR 1.091 LEPC Planning Requirements

Requires the LEPC have an EHS Facility Emergency Response Plan as set out in the “Emergency Response Planning Guide for EHS Facilities” for each facility in the planning district that has an EHS in excess of the TPQ that has been approved by the KERC.

106 KAR 1:091 KERC fee account grant requirements for LEPCs

LEPC Planning Requirements

The LEPC shall have an EHS Facility Emergency Response Plan pursuant to KRS 39E.110 and 39E.150 as set out in the “Emergency Response Planning Guide for EHS Facilities” for each facility in the planning district that has an EHS in excess of the TPQ that has been approved by the KERC.



KAR 1.091 ACL and Plan Checklist

The LEPC must submit an EHS Facility Emergency Response Plan Checklist with all plans submitted for KERC approval.

The LEPC shall submit new plans to the KYEM AM within sixty (60) days.

No later than April 1 each year, the LEPC must submit an ACL to the KYEM AM.

106 KAR 1:091 KERC fee account grant requirements for LEPCs.

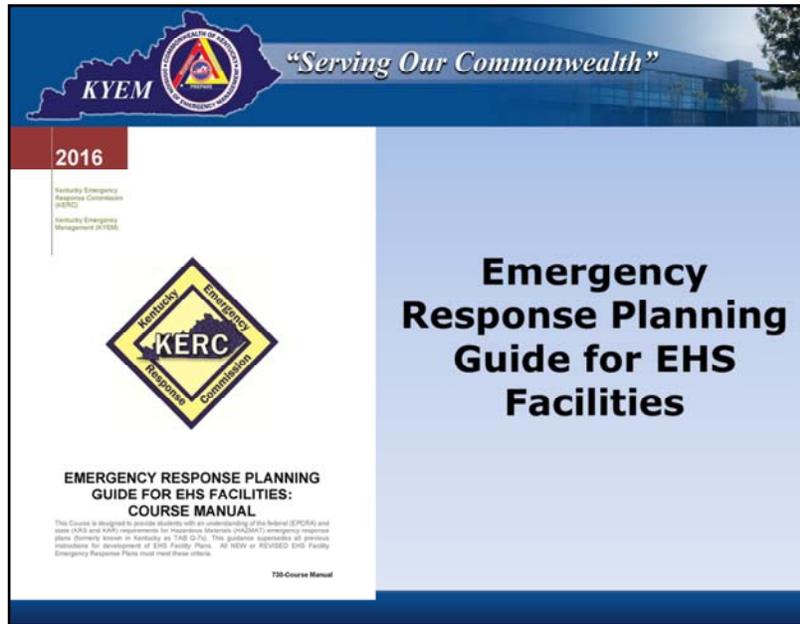
ACL & Plan Checklist

The **LEPC shall submit new EHS Facility Emergency Response Plans** to the Kentucky Emergency Management (KYEM) Area Manager (AM) **within sixty (60) days** of notification that the facility has an extremely hazardous substance (EHS) in excess of the threshold planning quantity (TPQ).

The LEPC shall submit a completed EHS Facility Emergency Response Plan Checklist with all EHS Facility Emergency Response plans submitted for KERC approval.

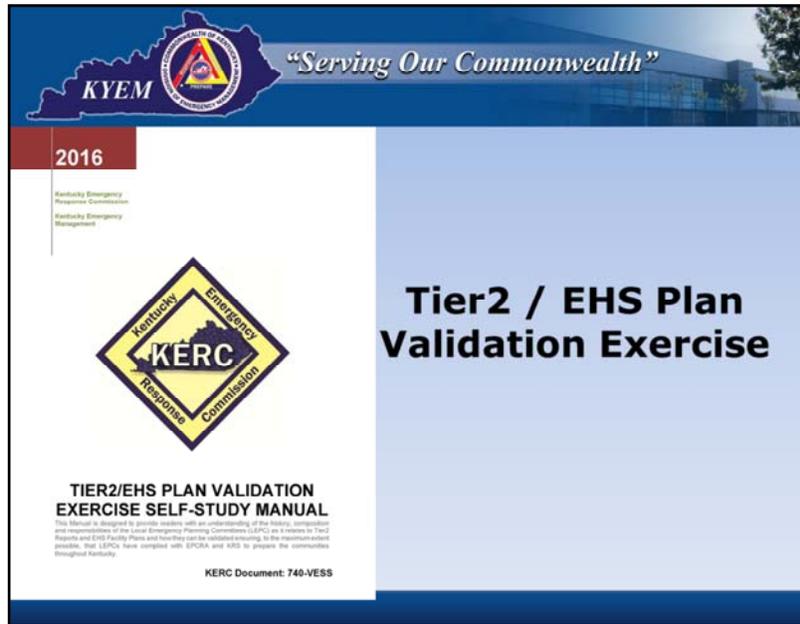
*Checklists must be completed entirely. Per the current EHS Planning Guidance, the radius of the vulnerable (potentially impacted) zone around the facility must be determined, except in a case where the designated radius does not exceed the boundaries of the facility in question or does not impact directly on a populated area. The Vulnerable Zone is a Kentucky requirement. However, this exception does not permit the exclusion or omission of other critical areas of the TAB EHS Plan Template. Many, if not most, of the other requirements are federally mandated and must be addressed regardless of the potential for a chemical to leave the boundaries of the facility. LEPCs must meet all federal planning requirements on ALL plans for facilities which have EHS Chemicals. Using the EHS Plan Checklist LEPCs must check yes on every box or include justification on the checklist **and** in the actual plan as to why a section was omitted. The only section to which the KERC has provided an exception to this is currently the Special Facilities Information, specifically relating to the VZ.*

No later than April 1 each year, the LEPC shall review all EHS Facility Emergency Response Plans and send an Annual Certification Letter (ACL) to the KYEM AM stating that there were no changes and therefore the plan is correct as is; or the plan has been revised and the revisions are included with the ACL.



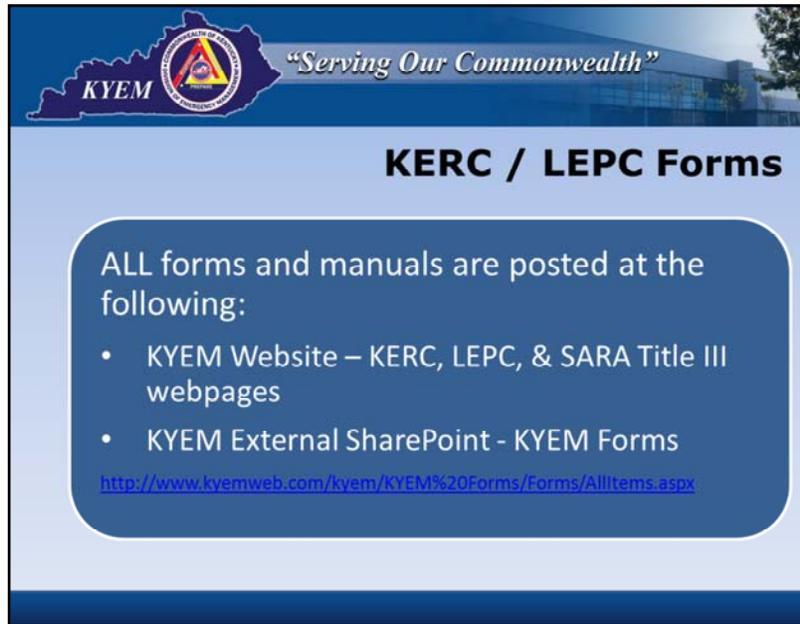
Emergency Response Planning Guide for EHS Facilities

This manual is designed to provide readers with an understanding of the federal (EPCRA) and state (KRS and KAR) requirements for Hazardous Materials (HAZMAT) emergency response plans (formerly known in Kentucky as TAB Q-7s). This guidance supersedes all previous instructions for development of EHS Facility plans. This document provides instructions for completion of each section of the plan. All NEW or REVISED EHS Facility Emergency Response Plans must meet these criteria.



Tier2 / EHS Facility Plan Validating Exercise:

Module 4 of the Kentucky Emergency Response Commission (KERC) Local Emergency Planning Committee (LEPC) Courses. Includes the final culminating activity; a Tier2 / EHS Facility Plan Validating Exercise. This course is designed to provide active LEPC members with an understanding of the relationship between Tier2 reporting and EHS Facility plans and how both can be utilized to ensure the LEPC is fulfilling its EPCRA and KRS planning requirements.



KERC / LEPC Forms

In order to standardize KERC documentation the Kentucky Emergency Response Commission (KERC) adopted the “KERC Document Library” (KERC Document #001-LIB) as the official document management process where which all approved KERC forms will be published. The KERC Document Library provides the official organizing, naming, and numbering protocol for all current and future forms.

All LEPCs must submit documentation in the current approved form as listed within the KERC Document Library. All documents will be submitted by LEPCs using electronic formats of forms listed within the KERC Document Library which will be made available to LEPCs through download from either the KYEM External SharePoint (or similar public location as designated by the Kentucky Division of Emergency Management), or download from the public KYEM Website on any/all of the KERC and LEPC webpages (KERC, LEPC, SARA Title III).

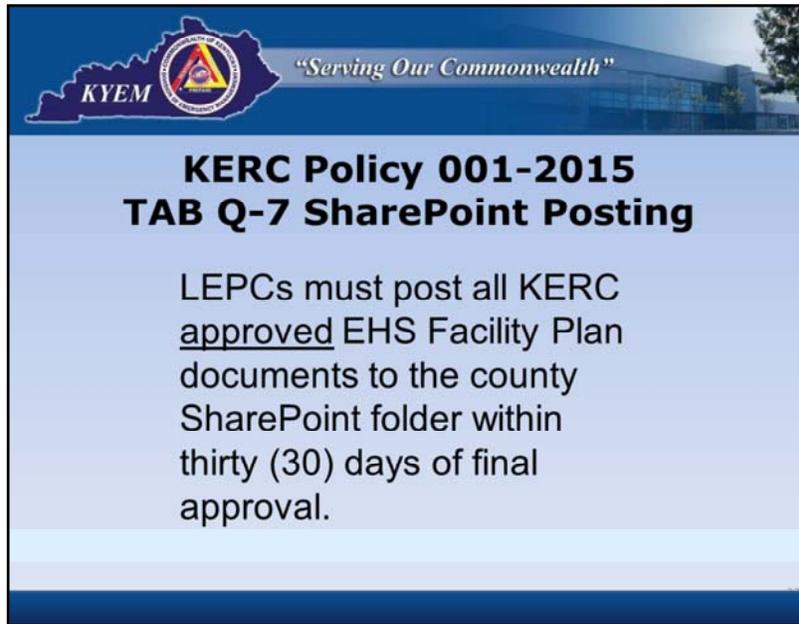
 *"Serving Our Commonwealth"*

Unit 3: KERC Policy 001-2015



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Unit 3: KERC Policy 001-2015



KERC Policy 001-2015 TAB Q-7 SharePoint Posting

"Necessity, Function, and Conformity" - The Kentucky Emergency Response Commission (KERC), through discussions with planners, first responders, and program staff has determined that having all approved EHS Facility Emergency Response Plans (Tab Q-7) posted to SharePoint would be a great benefit to the Commonwealth of Kentucky by affording State planners easy access to review and assist county planners and/or facilities should questions arise. More importantly, this will afford State operations, in the unfortunate event of a HAZMAT incident, virtual access to key information required to promptly and efficiently support a local response.

It is the policy of the KERC that:

All Local Emergency Planning Committees (LEPC) shall post all KERC approved Tab Q-7 documents to the designated county SharePoint site (or similar location as designated by the Kentucky Division of Emergency Management), within thirty (30) days of final approval.

Tab Q-7 documents include:

KERC approved Tab Q-7 Plan

Plans Checklist signed by the:

- LEPC Chair,
- KYEM Area Manager, and
- KERC Commissioner

An official approval letter signed by the Chairperson of the KERC.

This policy was voted on and approved by the KERC Board of Commissioner at the July 29th, 2015 meeting.

If any plan is missing either of these documents it should be consider non-approved and the LEPC should complete the review process and submit the LEPC approved plan, with checklist, to the KYEM Area Manager within 60 days.



Why post plans to SharePoint?

KRS 39E.100
(1) LEPCs are created as part of the KERC
(2) LEPC members shall be considered as agents of the state including liability protection.

The approved plan is proof meeting legal requirements:
LEPC: created a plan that was approved by the KERC
KERC: ensured the LEPC created a plan that met the Kentucky's plan requirements

Gives access to State EOC and Duty Officers in the event of an incident

Why post plans to SharePoint?

39E.100 Local planning committees.

- (1) Local emergency planning committees are created as part of the state commission.
- (2) Local committee members shall be appointed by the commission, and shall be considered as agents of the state for all purposes, including purposes of liability protection.



What Plans Get Posted

Does plan have in a single document the:

- KERC approved Plan
- Checklist signed by the:
 - LEPC Chair,
 - KYEM Area Manager, and
 - KERC Commissioner
- An official approval letter signed by the Chairperson of the KERC.

YES... Required to be posted
NO... NOT required to be posted

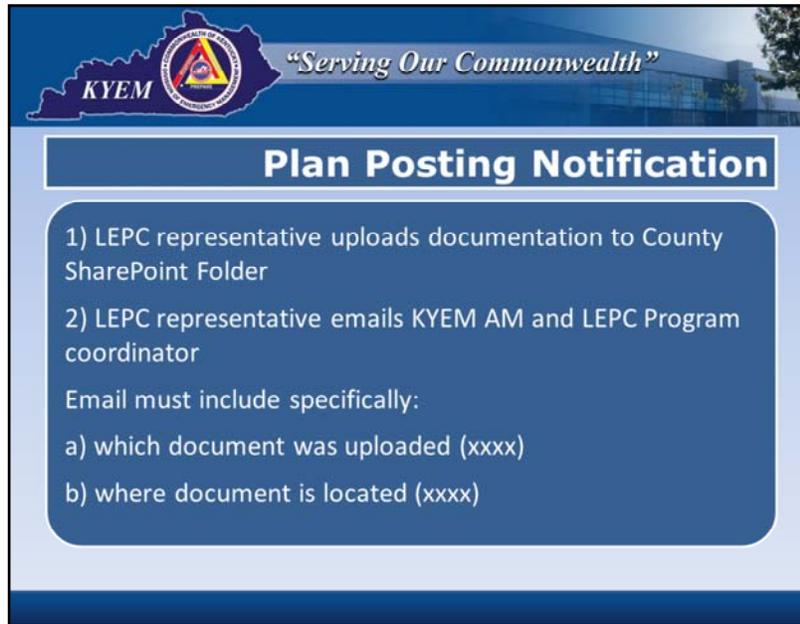
What Plans Get Posted

Does plan have in a single document the:

- KERC approved Plan
- Checklist signed by the:
 - LEPC Chair,
 - KYEM Area Manager, and
 - KERC Commissioner
- An official approval letter signed by the Chairperson of the KERC.

YES... Required to be posted

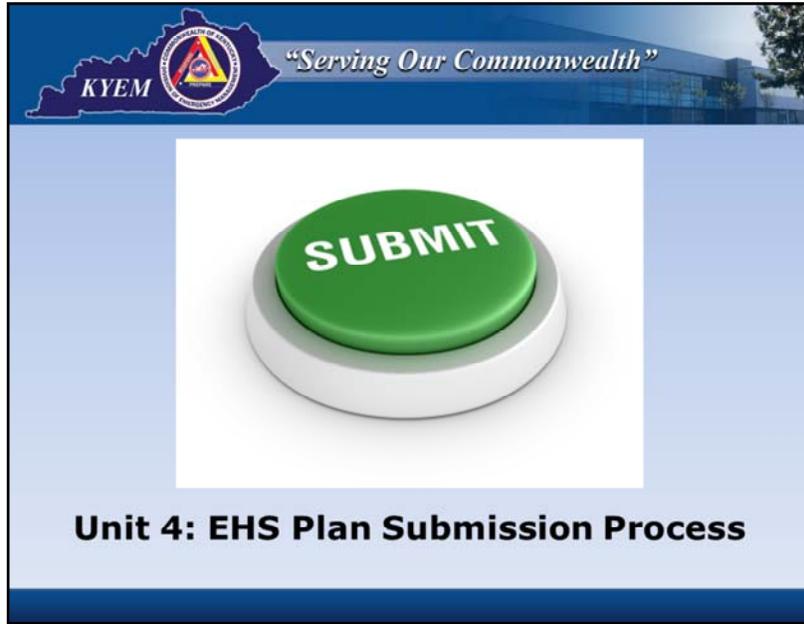
NO... NOT required to be posted



Plan Posting Notification

All KERC documents will be either required to be submitted directly to the KYEM AM, the KERC Chair, or a designee. In all cases the Chair's designee would constitute LEPC Program Staff in Frankfort and documents should be "submitted" in the following manner:

- 1) LEPC representative uploads documentation to County SharePoint Folder
 - 2) LEPC representative emails KYEM AM and LEPC Program coordinator
- Email must include specifically:
- a) which document was uploaded (xxxx)
 - b) where document is located (xxxx)



Unit 4: EHS Plan Submission Process

PROTECTIVE ACTIONS: (SIP/EXIT SIP AND/OR EVACUATION/RE-ENTRY)
EMERGENCY EQUIPMENT ON-HAND/TRAINING/EXERCISING:
MEDICAL CAPABILITIES:
SPILL CONTAINMENT / CLEAN-UP / DISPOSAL:
EMERGENCY NOTIFICATION:

EMERGENCY NOTIFICATION LIST TEMPLATE			
Local 24-hr. Warning Number (LEPC)			- -
State 24-hour warning point for HAZMAT Spill Notification			1-800-255-2587
Local Emergency Planning Committee Chair	- -	or	- -
Kentucky Emergency Response Commission (KERC)			502-607-1682
Community HAZMAT Coordinator (Day)	- -	or	- -
(Night)	- -	or	- -
Alternate HAZMAT Coordinator (Day)	- -	or	- -
(Night)	- -	or	- -
	Local Fire Dept.		- -
	Local Police Dept.		- -
Local EM Director (Day)	- -	or	- -
(Night)	- -	or	- -
	Rescue		- -
	Ambulance		- -
KYEM Area Manager (AM)		(C)	- -
		(H)	- -
Kentucky Department for Environmental Protection (KY-DEP)			502-564-2380
24 Hour Hotline			1-800-928-2380
National Response Center (NRC)			1-800-424-8802
U. S. Environmental Protection Agency (EPA) Hotline			1-800-424-9346
	10:00 a.m. – 3:00 p.m. EST, Mon. – Thurs.		
State Fire Marshal			502-573-0382
CHEMTREC			1-800-424-9300
Kentucky State Police			502-782-1800
ALL Special Facilities Located within the Vulnerable Zone			

Note: There are two tables in this document. To make document visually more aesthetically you may hide individual cell lines, hover mouse over small directional arrows at the top left-hand corner of each table, right-click, select borders and shading, select all, and click OK.

10/26/2015 11:26 AM Page 2 KERC Form: 301-PT

EHS Facility Plan Template Page 2

EHS Facility Plan Template Page 2

Protective Actions: (SIP /Exit SIP and/or Evacuation/Re-Entry)

Emergency Equipment On-hand/Training/Exercising:

Medical Capabilities:

Spill Containment / Clean-Up / Disposal:

Emergency Notification:

Emergency Notification List Template

Local 24-hr. Warning Number (LEPC)

State 24-hour warning point for HAZMAT Spill Notification: 1-800-255-2587

Local Emergency Planning Committee Chair

Kentucky Emergency Response Commission (KERC): 502-607-1682

Community HAZMAT Coordinator

Alternate HAZMAT Coordinator

Local Fire Dept.

Local Police Dept.

Local EM Director

Rescue

Ambulance

KYEM Area Manager (AM)

Kentucky Department for Environmental Protection (KY-DEP) 502-564-2380

24 Hour Hotline: 1-800-928-2380

National Response Center (NRC): 1-800-424-8802

U. S. Environmental Protection Agency (EPA) Hotline : 1-800-424-9346

10:00 a.m. – 3:00 p.m. EST, Mon. – Thurs.

State Fire Marshal: 502-573-0382

CHEMTREC: 1-800-424-9300

Kentucky State Police: 502-782-1800

ALL Special Facilities Located within the Vulnerable Zone



Submission Process Step 1:

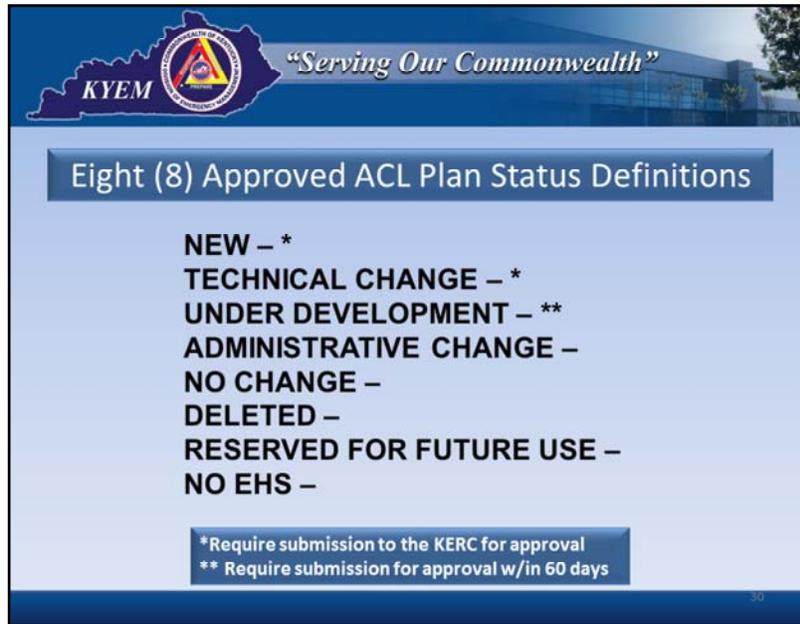
New Plan: LEPC Planning Team creates plan and presents to full LEPC for approval.

***Old Plan:** LEPC Planning Team reviews current plan, makes changes as required, and presents to full LEPC for approval.

***If necessary, see status definitions, presents to full LEPC for approval.**

**EHS Facility Emergency Response Plan Submission Process:
Step 1:**

New EHS Facility plans or existing EHS Facility Plans with technical changes require approval from a quorum of the KERC prior to their inclusion in the County EOP.



Eight (8) Approved ACL Plan Status Definitions

* **NEW** – New plan that is complete and has been approved by LEPC but has never been reviewed or approved by a KYEM RRM or the KERC; requires submitting a County Title III Plan Checklist.

* **TECHNICAL CHANGE** – A plan that has prior KERC approval but, includes changes that materially affect response operations in the event of a release of an EHS; requires submitting a County Title III Plan Checklist. Complete definition in “Kentucky’s TAB Q-7 Plan Development Guidance Manual”.

** **UNDER DEVELOPMENT** - New plan that is not complete, has not been approved by LEPC, and has never been reviewed or approved by KYEM RRM or KERC. Requires submitting a County Title III Plan Checklist. 106 KAR 1:091 states that the LEPC shall submit a TAB Q-7 to the RRM within sixty (60) days of notification that the facility has an EHS in excess of the TPQ.

ADMINISTRATIVE CHANGE (DATE) - A plan that has prior KERC approval, however; changes that do not materially affect response operations in the event of a release of an EHS have been made during the annual review. Complete definition in “Kentucky’s TAB Q-7 Plan Development Guidance Manual”. Include the date of the administrative change(s) in the FACILITY field.

NO CHANGE - A plan that has prior KERC approval and has not been changed since its last review. Plan is currently on the county SharePoint page with a signed/dated County Title III Plan Checklist and KERC approval letter.

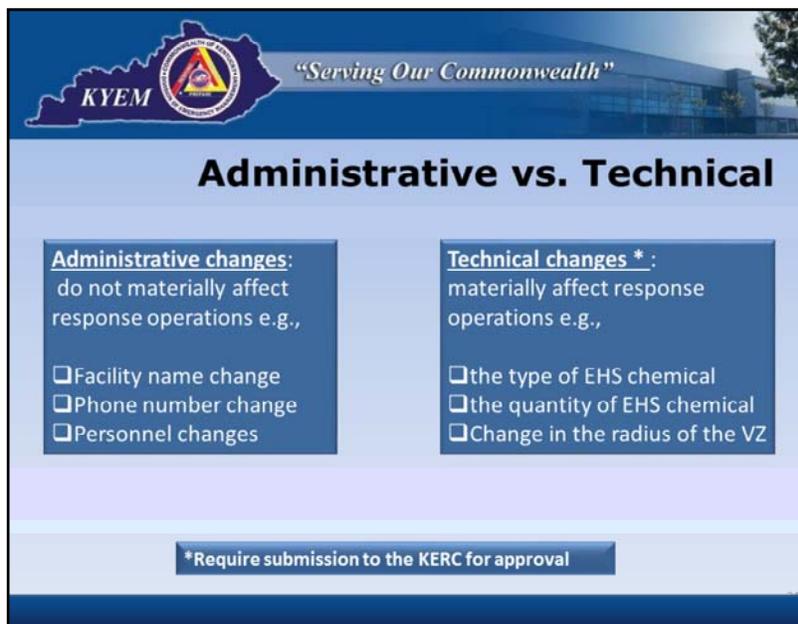
DELETED (DATE) – An obsolete plan that is no longer part of the County EOP. ACL includes date and reason plan was deleted. These plans do not count toward KERC fee account grant distribution formula. Include the date the plan was deleted in the FACILITY field.

RESERVED FOR FUTURE USE – Plan does not exist but space reserved for future plan. These plans do not count towards KERC fee account grant distribution formula.

NO EHS – An optional plan created by the LEPC for a facility that does not house any EHS’s. These plans do not count towards KERC fee account grant distribution formula.

*Require submission to the KERC for approval

** Require submission for approval w/in 60 days



Definitions: Administrative vs. Technical

The EHS Facility Plans Checklist was revised in 2006 (current version Dec 2014) to allow differentiation between administrative and technical changes made to EHS Facility Plans. Administrative changes do not require approval by the KERC and a Checklist does not need to be prepared. The definitions of Administrative and Technical Changes are given below. A copy of the Checklist is provided in this manual see Table of Contents for exact location.

Administrative Change Definition

Administrative changes are those changes that in themselves do not materially affect response operations in the event of a release of an extremely hazardous substance. These changes include: name change of the facility, changes to telephone numbers, personnel changes, and changes to the names or numbers of affected special facilities listed for a quadrant in the vulnerable zone (unless these changes are due to a change in the radius of the vulnerable zone).

* Technical Change Definition

Technical changes are those changes that materially affect response operations in the event of a release of an extremely hazardous substance (EHS). These include changes to the type or quantity of EHS chemicals that may cause an increase or decrease in the radius of the vulnerable zone, and other changes that affect the size of the vulnerable zone. In the event of a change in the size of the vulnerable zone, corresponding sections of the Title III Plan such as Response Point, Staging Area, and Special Facilities should be reviewed to determine if and how the change has affected these sections. If Special Facilities have been added to or subtracted from quadrants due to the change in radius the drawing of the new radius should include these changes.

*Require submission to the KERC for approval



New vs. Under Development

<p>* NEW –</p> <ul style="list-style-type: none"> <input type="checkbox"/> Complete <input type="checkbox"/> Has been reviewed and approved by the LEPC <input type="checkbox"/> Has NOT been reviewed or approved by a KYEM AM or the KERC. 	<p>** UNDER DEVELOPMENT –</p> <ul style="list-style-type: none"> <input type="checkbox"/> Complete -or- Not complete <input type="checkbox"/> Has NOT been reviewed and approved by the LEPC <input type="checkbox"/> Has NOT been reviewed or approved by KYEM AM or KERC. <input type="checkbox"/> 106 KAR 1:091 requires LEPCs submit EHS Facility Plans to the KYEM AM within sixty (60) days of notification that the facility has an EHS.
<p>*Require submission to the KERC for approval</p> <p>** Require submission for approval w/in 60 days</p>	

Definitions: New vs. Under Development

*** NEW** – A new plan is one that is complete and has been reviewed and approved by the LEPC but has **NOT** been reviewed or approved by a KYEM AM or the KERC. New plans require submitting a signed EHS Facility Plan Checklist with the EHS Plan.

**** UNDER DEVELOPMENT** – A plan that may be complete -or- is **NOT** yet complete, but has not been reviewed and approved by LEPC. Under development plans have **NOT** been reviewed and approved by KYEM AM or KERC. 106 KAR 1:091 states that the LEPC shall submit an EHS Facility Plan to the KYEM AM within sixty (60) days of notification that the facility has an EHS in excess of the TPQ. When Under Development Plans are officially reviewed and approved by the LEPC their designation will change to NEW and will accordingly require submitting a signed EHS Facility Plan Checklist with the EHS Plan.

***Require submission to the KERC for approval**

**** Require submission for approval w/in 60 days**

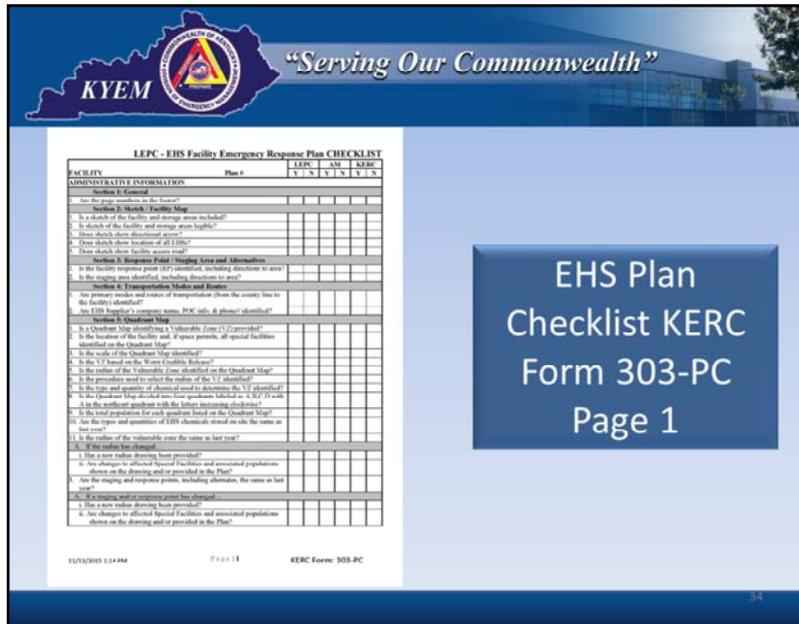


Submission Process Step 2:

- EHS Facility Plan Checklist is completed and signed by LEPC Chair.
- Check boxes marked no must have explanation for omission in the General Comments Section (#10) of the Plan Checklist
- Plan and Checklist are forwarded to the KYEM AM.

**EHS Facility Emergency Response Plan Submission Process:
Step 2:**

- The Plan must first be reviewed by the LEPC of the county in which the facility is located using the EHS Facility Emergency Response Plan Checklist.
- If the LEPC finds the Plan acceptable, the Checklist shall be signed by the LEPC Chair and the Plan and Checklist forwarded to the KYEM Area Manager (AM) for the county where the facility is located.



EHS Facility Emergency Response Plan Checklist (KERC Form 303-PC) Page 1

Section 1: General

1. Are the page numbers in the footer?

Section 2: Sketch / Facility Map

1. Is a sketch of the facility and storage areas included?
2. Is sketch of the facility and storage areas legible?
3. Does sketch show directional arrow?
4. Does sketch show location of all EHSs?
5. Does sketch show facility access road?

Section 3: Response Point / Staging Area and Alternatives

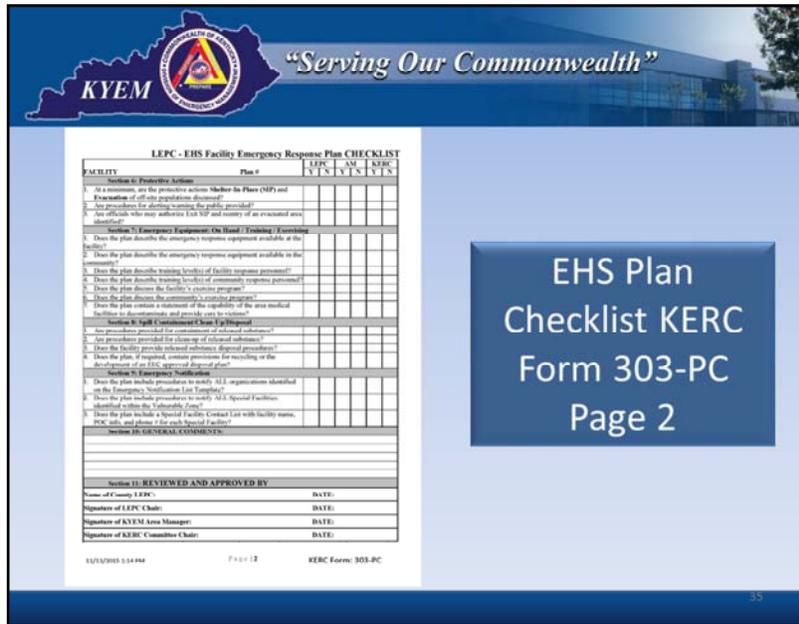
1. Is the facility response point (RP) identified, including directions to area?
2. Is the staging area identified, including directions to area?

Section 4: Transportation Modes and Routes

1. Are primary modes and routes of transportation (from the county line to the facility) identified?
2. Are EHS Supplier's company name, POC info, & phone# identified?

Section 5: Quadrant Map

1. Is a Quadrant Map identifying a Vulnerable Zone (VZ) provided?
2. Is the location of the facility and, if space permits, all special facilities identified on the Quadrant Map?
3. Is the scale of the Quadrant Map identified?
4. Is the VZ based on the Worst Credible Release?
5. Is the radius of the Vulnerable Zone identified on the Quadrant Map?
6. Is the procedure used to select the radius of the VZ identified?
7. Is the type and quantity of chemical used to determine the VZ identified?
8. Is the Quadrant Map divided into four quadrants labeled as A,B,C,D with A in the northeast quadrant with the letters increasing clockwise?
9. Is the total population for each quadrant listed on the Quadrant Map?
10. Are the types and quantities of EHS chemicals stored on site the same as last year?
11. Is the radius of the vulnerable zone the same as last year?
 - A. If the radius has changed...
 - i. Has a new radius drawing been provided?
 - ii. Are changes to affected Special Facilities and associated populations shown on the drawing and/or provided in the Plan?
3. Are the staging and response points, including alternates, the same as last year?
 - A. If a staging and/or response point has changed...
 - i. Has a new radius drawing been provided?
 - ii. Are changes to affected Special Facilities and associated populations shown on the drawing and/or provided in the Plan?



EHS Plan
Checklist KERC
Form 303-PC
Page 2

EHS Facility Emergency Response Plan Checklist (KERC Form 303-PC) Page 2

Section 6: Protective Actions

1. At a minimum, are the protective actions Shelter-In-Place (SIP) and Evacuation of off-site populations discussed?
2. Are procedures for alerting/warning the public provided?
3. Are officials who may authorize Exit SIP and reentry of an evacuated area identified?

Section 7: Emergency Equipment: On Hand / Training / Exercising

1. Does the plan describe the emergency response equipment available at the facility?
2. Does the plan describe the emergency response equipment available in the community?
3. Does the plan describe training level(s) of facility response personnel?
4. Does the plan describe training level(s) of community response personnel?
5. Does the plan discuss the facility’s exercise program?
6. Does the plan discuss the community’s exercise program?
7. Does the plan contain a statement of the capability of the area medical facilities to decontaminate and provide care to victims?

Section 8: Spill Containment/Clean-Up/Disposal

1. Are procedures provided for containment of released substance?
2. Are procedures provided for clean-up of released substance?
3. Does the facility provide released substance disposal procedures?
4. Does the plan, if required, contain provisions for recycling or the development of an EEC approved disposal plan?

Section 9: Emergency Notification

1. Does the plan include procedures to notify ALL organizations identified on the Emergency Notification List Template?
2. Does the plan include procedures to notify ALL Special Facilities identified within the Vulnerable Zone?
3. Does the plan include a Special Facility Contact List with facility name, POC info, and phone # for each Special Facility?

Section 10: GENERAL COMMENTS:

Section 10: REVIEWED AND APPROVED BY

Checklist must be reviewed, signed upon approval, and dated by: LEPC CHAIRPERSON, KYEM AM, KERC Committee Chair, before being sent to KERC for final approval.



Submission Process Step 3:

If plan is approved by the AM, checklist gets signed and sent with plan to the KYEM Planner.

Rejected plans will be returned to LEPC Chair with an explanation. The goal of the checklists is to ensure plans don't get rejected... nobody wants to reject a plan!!!

EHS Facility Emergency Response Plan Submission Process: Step 3:

- The KYEM AM shall review new EHS Facility Emergency plans and their accompanying checklists for completeness. Plans deemed complete by the KYEM AM shall be forward them to the Chairman of the Kentucky Emergency Response Commission, or designee, within thirty (30) days of receipt from the local emergency planning committee. Plans deemed incomplete shall be returned to the local emergency planning committee with recommendations.

The AM will complete his/her portion of the Checklist and send both it and the Plan to the designated KYEM Planner for final review before presentation to the KERC Planning Committee.

Note: Annually, the KYEM AM shall review the ACL and all EHS Facility Emergency Response Plan revisions received from the local emergency planning committee for completeness, note any recommendations and forward them to the Chairman of the Kentucky Emergency Response Commission, or designee, no later than May 1 each year.



Submission Process Step 4:

If plan gets approved (informal process) by the KYEM Planner he/she recommends it to the KERC Planning Committee for approval.

Rejected plans will be returned to KYEM AM with an explanation. The goal of the checklists is to ensure plans don't get rejected... nobody wants to reject a plan!!!

**EHS Facility Emergency Response Plan Submission Process:
Step 4:**

- The KYEM Planner will send a receipt notice to the AM and the LEPC stating that the Plan has been recommended for approval and giving the dates of the KERC Planning Committee and full KERC meetings. If the Planner does not approve the Plan it will be returned with comments to the AM for correction by the preparer.



Submission Process Step 5:

Plans approved by the Planning Committee are presented to the full KERC for approval during the next scheduled meeting.

Rejected plans will be returned to KYEM AM, via KYEM Planner, with an explanation. The goal of the checklists is to ensure plans don't get rejected... nobody wants to reject a plan!!!

EHS Facility Emergency Response Plan Submission Process: Step 5:

- New SARA Title III Plans and existing Plans with technical changes approved by the KERC Planning Committee shall be presented by the Planning Committee Chair to the full KERC during the next scheduled meeting. The KERC currently meets bi-monthly on odd months. All meeting time and locations are posted in advance at: <http://kyem.ky.gov/Who%20We%20Are/Pages/KERC.aspx>
- If the KERC accepts the EHS Facility Emergency Response Plan an approval letter signed by the Chairperson of the KERC will be sent to the LEPC Chair, KERC Chair, KERC Planning Committee, KYEM Planning Branch Manager, KYEM Planning Staff, KYEM AM & AA, County EM, and the County Judge/Executive.

If the KERC does not accept the Plan as presented a disapproval letter will be sent to the LEPC and KYEM AM.



**EHS Facility Emergency Response Plan Submission Process:
Step 6:**

- If the KERC accepts the EHS Facility Emergency Response Plan an approval letter will signed by the Chairperson of the KERC and will be given to the KYEM Planner for distribution.

If the KERC does not accept the Plan as presented a disapproval letter will be given to the KYEM Planner for distribution.



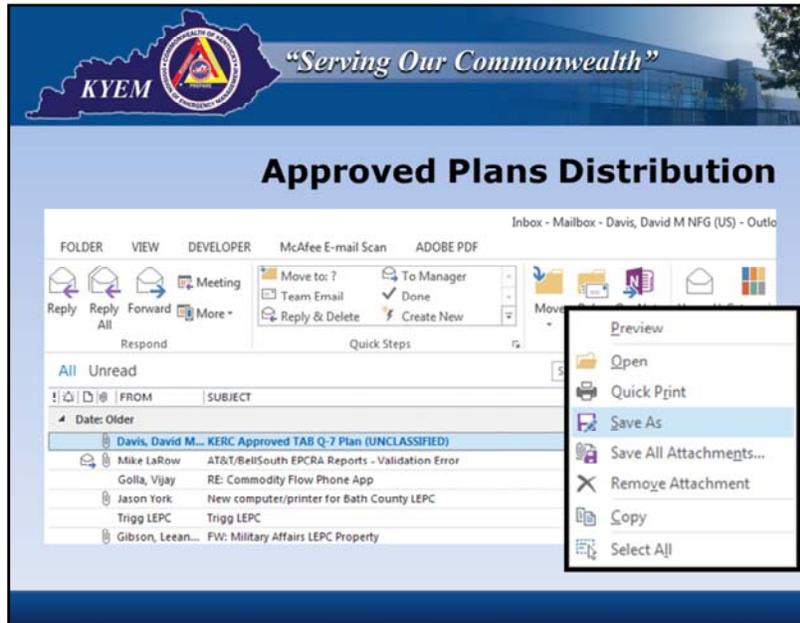
EHS Facility Emergency Response Plan Submission Process: Step 7:

The KYEM Planner will organize all plan documents into a single file (.pdf):

- Approved plan,
- Signed checklist, &
- Signed approval letter

The KYEM Planner will email all plan documents as a single pdf file to:

- LEPC Chair,
- Local EM,
- CJE, &
- KYEM AM.



Approved Plans Distribution

LEPC Chair will receive all approved plan documents via email. LEPCs should save file and begin distribution to all pertinent entities.



Approved Plan Name

KYEM Planner will rename plan. It is highly recommended that you do **NOT** change the name. Name must include County, number, facility name, approval date.

Example:

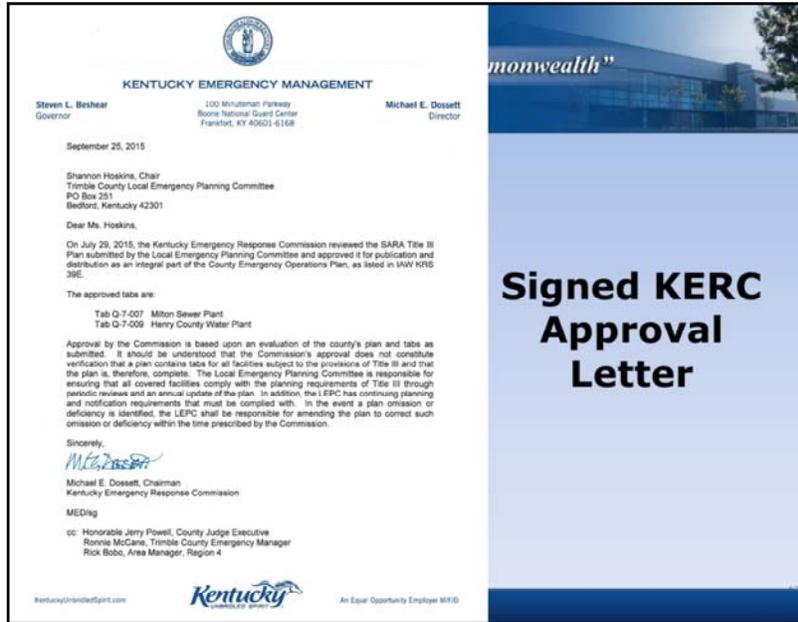
NKY, Kenton Co, 059-035, IRS, KERC Approved, 13 May 2015

Approved Plan Name

KYEM Planner will rename plan. It is highly recommended that you do **NOT** change the name. Name must include County, number, facility name, approval date.

Example:

NKY, Kenton Co, 059-035, IRS, KERC Approved, 13 May 2015



Signed KERC Approval Letter

TRIMBLE COUNTY TITLE III PLANS CHECKLIST

FACILITY *Henry Co. Water Plant* TAB NO. *9-7-9*

	LEPC		RRM		KERC	
	Y	N	Y	N	Y	N
ADMINISTRATIVE INFORMATION						
General						
1. Are the facility TAB Q and page numbers provided in the center of the footer?	✓		✓		✓	
2. Are the county number, change number, and year of change provided on the right side of the footer?	✓		✓		✓	
Facility Map						
1. Is a map of the facility included?	✓		✓		✓	
2. Is/are drawing(s) of facility legible, show directional arrow, location of EHS, and access road?	✓		✓		✓	
Response Point/Staging Area						
1. Is the response point (RP) identified?	✓		✓		✓	
2. If the staging area is in the vulnerable zone, is an alternate staging area discussed?	✓		✓		✓	
Transportation Routes						
1. Are primary transportation routes from the County line to the facility identified?	✓		✓		✓	
2. Are major Suppliers and telephone numbers identified?	✓		✓		✓	
Protective Actions						
1. As a minimum, are the protective actions Shelter-In-Place (SIP) and Evacuation of off-site populations discussed?	✓		✓		✓	
2. Are procedures for alerting/warning the public provided?	✓		✓		✓	
3. Are officials who may authorize reentry of an evacuated area identified?	✓		✓		✓	
4. Does the plan contain a statement of the capability of the area medical facilities to decontaminate and provide care to victims?	✓		✓		✓	
5. Is available emergency equipment listed?	✓		✓		✓	
6. Is employee training discussed?	✓		✓		✓	
Emergency Equipment on Hand/Training/Exercising						
1. Does the plan discuss an exercise program for the facility?	✓		✓		✓	
2. Does the plan discuss an exercise program for the community?	✓		✓		✓	
3. Is available emergency equipment listed or referenced?	✓		✓		✓	
4. Does the plan describe the training level(s) of community response personnel?	✓		✓		✓	
5. Does the plan describe the training level(s) of facility response personnel?	✓		✓		✓	
Spill Containment/Clean-Up/Disposal						
1. Are procedures provided for containment of released substances?	✓		✓		✓	
2. Are procedures provided for clean-up of spills?	✓		✓		✓	
3. Does the plan contain provisions for recycling or development of E&PPC approved disposal plan, if required?	✓		✓		✓	
4. Are appropriate emergency notification numbers listed?	✓		✓		✓	
NOTE: All numbers may not be needed.						

Updated 7 February 2014 1



**Signed Checklist
Page 1**

Signed Checklist Page 1

TAB Q-7-9
COVERED FACILITY

FACILITY NAME	FACILITY EMERGENCY RESPONSE COORDINATOR	COMMUNICATIONS
Henry Co. Water Plant	Audrey Morgan	Office # 502-255-0126
St. 3278 Morton Ridge	Title: Plant Supervisor	Home # 502-974-5722
City Bedford		R. Fred
		Pager #

Aerial Photo

ALTERNATE FACILITY RESPONSE COORDINATOR		
Latitude 38.537537	James Simpson	Office # 502-532-6279
Longitude 83.287825	Title: Chief Operating Officer	Home # 502-845-5688
		R. Fred
		Pager # 502-724-3387

HAZARDOUS CHEMICAL(S)					
NAME	UN ID #	FORM	PACKAGED CONTAINER	MAXIMUM QUANTITY	HEALTH RISK
Chlorine	UN ID # 22131	Toxic Gas	One Ton Cylinders	6,000 lbs	1
7782-50-5					

Strong oxidizing agent. Hazardous gas and liquid under pressure. May cause chemical pneumonia or even death in high concentrations.

SKETCH OF FACILITY AND STORAGE AREAS

See Page Q-7-9-5

FACILITY RESPONSE POINT (RP) AND DIRECTIONS:

The facility response point is at 3278 Morton Ridge Road. Directions to the plant are: West from Bedford on US Hwy 42 turn right on to Morton Ridge Road (Ky 2868) and travel 3.5 miles. The Plant is on the right. The facility emergency response coordinator or alternate will meet the emergency responders at the facility response point to brief them on the current emergency situation and will have a copy of the Title III plan, and MSDS available for reference. An alternate facility response point may be selected if required by weather or wind conditions.

STAGING AREA:

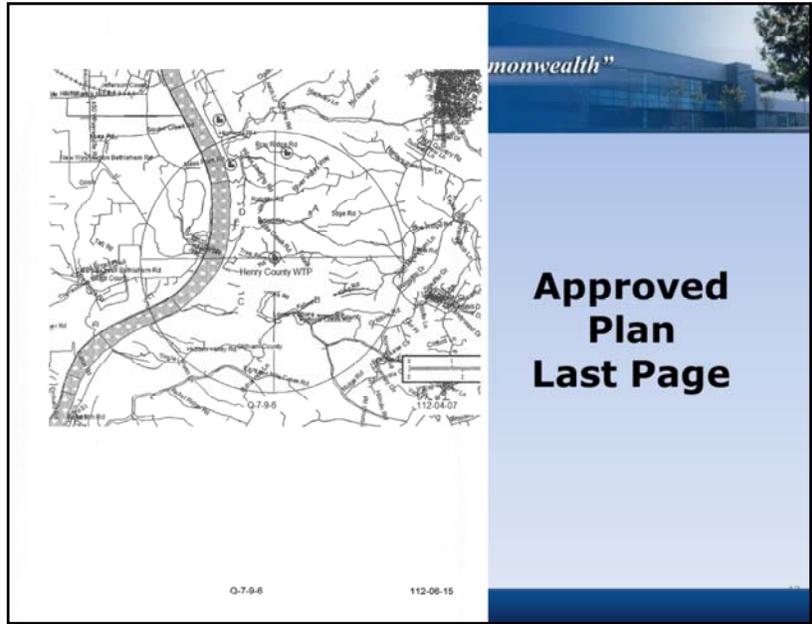
Support units will report to the Bedford Fire & Rescue Station # 2 at US Hwy 42 and KY, 2868 Morton Ridge Road and await assignment by local EM/ Fire officials until the weather and wind direction have been determined. The Fire Station is approximately 3.0 mi. east of plant. An

Q-7-9-1 112-06-15



Approved
Plan Page 1

Approved Plan Page 1



Approved Plan Last Page



KERC Approved Plan Storage

Approved plans should be maintained in several locations, including but not limited to:

- in LEPC office
- at the facility
- at the fire department
- In the County EOP
- in the County SharePoint folder

KERC Approved Plan Storage

Approved plans should be maintained in several locations, including but not limited to: LEPC files, at the facility, with the fire department that would respond to an incident at the facility, in the County Emergency Operations Plan (EOP), and stored on the County SharePoint folder for access by state agencies.

Discussion Questions:

-
-
-

Legal References: KRS 39E. 160



Approved Plan Distribution

Every individual and entity named in the EHS Facility plan should have access to the plan.

Every individual and entity the plan dictates will take action should have access to the plan.

This includes, but is not limited to:

- Facility personnel, including the FERC
- Local EM
- Special facilities
- First responders
- Local elected officials

Approved Plan Distribution

Every individual and entity named in the EHS Facility plan should have access to the plan.

Every individual and entity the plan dictates will take action should have access to the plan.

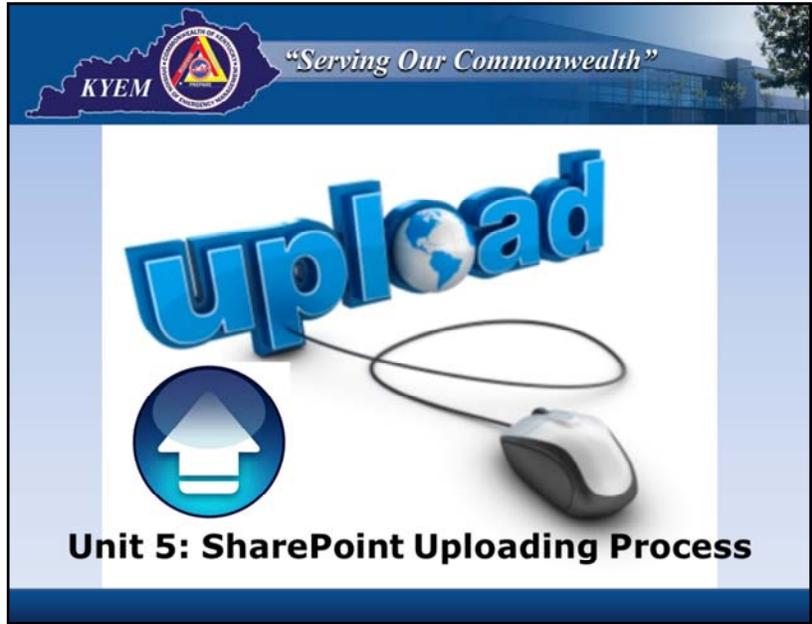
This includes, but is not limited to:

- Facility personnel, including the FERC
- Local EM
- Special facilities
- First responders
- Local elected officials
- LEPC Members

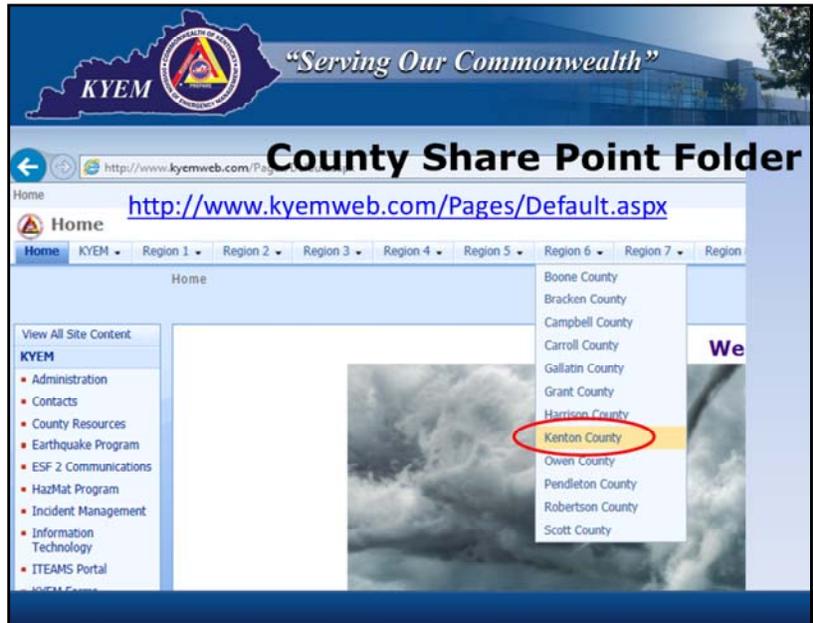
Discussion Questions:

-
-
-

Legal References: KRS 39E. 160



Unit 5: SharePoint Uploading Process



County Share Point Folder

Approved plan documents should be posted in the LEPC's county SharePoint folder found in the KYEM External SharePoint, <http://www.kyemweb.com/Pages/Default.aspx>,

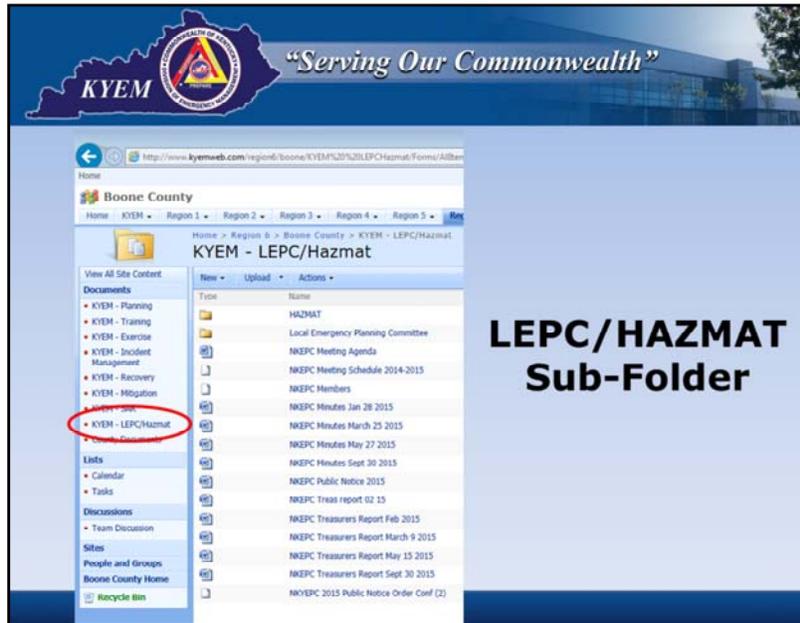
Select correct county from KYEM Area Drop down menu.



LEPC Document Folders

All county folders should have a document folder titled "LEPC/HAZMAT."

Select KYEM – LEPC/HAZMAT

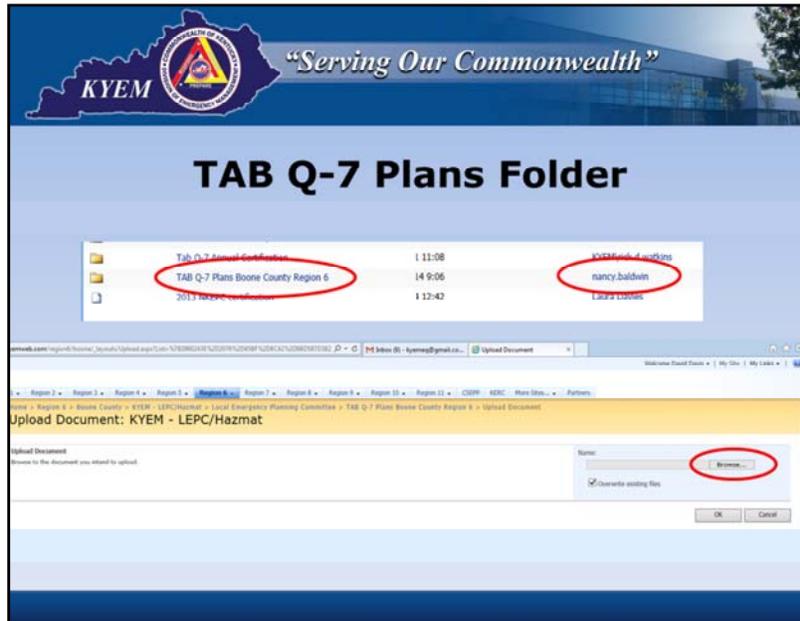


LEPC/HAZMAT Sub-Folder

LEPC/HAZMAT Sub-Folder

All LEPC/HAZMAT folders have a Local Emergency Planning Committee folder created by Nancy Baldwin in July 2014.

Select Local Emergency Planning Committee



TAB Q-7 Plans Folder

All Local Emergency Planning Committee folders have a TAB Q-7 Plans (County Name and KYEM Area #) folder created by Nancy Baldwin. KYEM hired Nancy as an ADDECCO to assist with organization and validation of the EHS Facility Plans across Kentucky. At the time plans were named using the TAB Q-7 protocol. KYEM does not foresee having the funds to hire another ADDECCO to make name changes to the individual folders created in SharePoint. County personnel may change folder names if desired.

Select TAB Q-7 Plans

Select Upload

Select Browse

Windows Explorer will open, find correct file (the copy emailed to the LEPC by KYEM Planner), and double click

Click OK



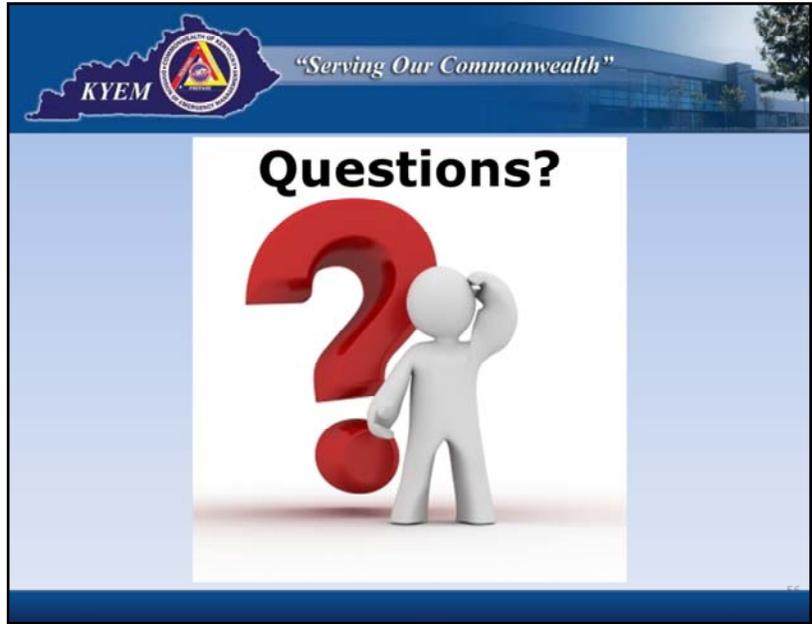
Appendix Items List

- Plan Submission, Approval, and Posting requirements, taken from 730-PG
- 003-CAL KERC Calendar of Events
- 505-AC Active LEPC Checklist

The remainder of the slide features several horizontal bars in shades of blue and light blue.

Discussion Questions:

-
-
-



Discussion Questions:

-
-
-



Noteworthy Resources

Kentucky Emergency Management

<http://kyem.ky.gov/Who%20We%20Are/Pages/KERC.aspx>
<http://kyem.ky.gov/Who%20We%20Are/Pages/LEPC.aspx>
<http://kyem.ky.gov/programs/Pages/SARATitleIII.aspx>

The following and other relevant items can be found in at least one of the Document Libraries found on the above websites:

<ul style="list-style-type: none"> •EPCRA: (SARA-TITLE-III) •KRS 39E •106 KAR 1.081 – 1.131 •County Title III Plan Checklist •Sara Title III Sample Certification Letter •List of Lists 	<ul style="list-style-type: none"> •EPCRA How to Comply Packet •Tier2 Reporting Fee Schedule •Battery Lead-Acid KERC Policy Documents •Kentucky LEPC's - It Is Your Right To Know •TAB Q-7 Plan Development Guidance •Tier2 Retail Gas Station Reporting Rule
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Noteworthy Resources

Kentucky Emergency Management

<http://kyem.ky.gov/Who%20We%20Are/Pages/KERC.aspx>

<http://kyem.ky.gov/Who%20We%20Are/Pages/LEPC.aspx>

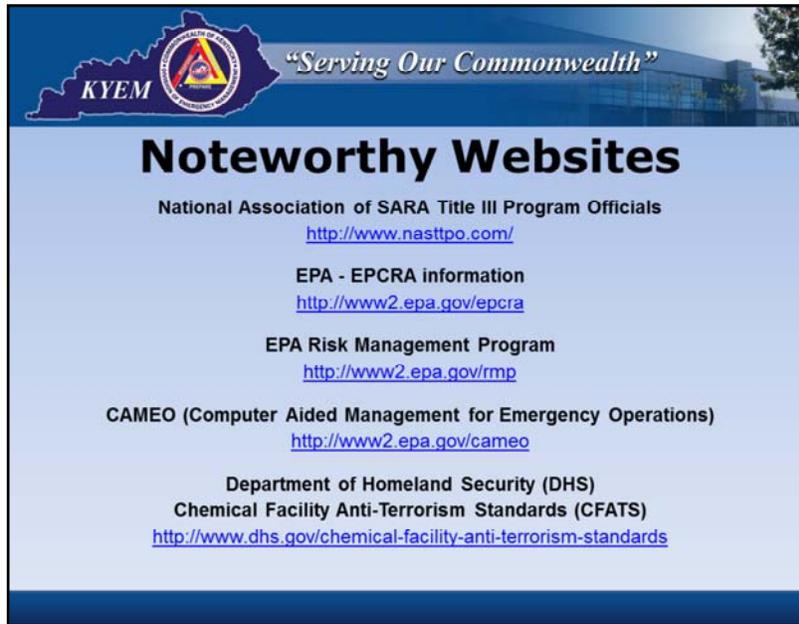
<http://kyem.ky.gov/programs/Pages/SARATitleIII.aspx>

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- KRS 39E
- 106 KAR 1.081 – 1.131
- County Title III Plan Checklist
- Sara Title III Sample Certification Letter
- List of Lists
- EPCRA How to Comply Packet
- Tier2 Reporting Fee Schedule
- Battery Lead-Acid KERC Policy Documents
- Kentucky LEPC's - It Is Your Right To Know
- TAB Q-7 Plan Development Guidance
- Tier2 Retail Gas Station Reporting Rule

Discussion Questions:

■



Noteworthy Websites

National Association of SARA Title III Program Officials

<http://www.nasttpo.com/>

EPA - EPCRA information

<http://www2.epa.gov/epcra>

EPA Risk Management Program

<http://www2.epa.gov/rmp>

CAMEO (Computer Aided Management for Emergency Operations)

<http://www2.epa.gov/cameo>

Department of Homeland Security (DHS)

Chemical Facility Anti-Terrorism Standards (CFATS)

<http://www.dhs.gov/chemical-facility-anti-terrorism-standards>

Discussion Questions:

-
-
-

Eight (8) Approved ACL Plan Status Definitions

* **NEW** – New plan that is complete and has been approved by LEPC but has never been reviewed or approved by a KYEM RRM or the KERC; requires submitting a County Title III Plan Checklist.

* **TECHNICAL CHANGE** – A plan that has prior KERC approval but, includes changes that materially affect response operations in the event of a release of an EHS; requires submitting a County Title III Plan Checklist. Complete definition in “Kentucky’s TAB Q-7 Plan Development Guidance Manual”.

** **UNDER DEVELOPMENT** - New plan that is not complete, has not been approved by LEPC, and has never been reviewed or approved by KYEM RRM or KERC. Requires submitting a County Title III Plan Checklist. 106 KAR 1:091 states that the LEPC shall submit a TAB Q-7 to the RRM within sixty (60) days of notification that the facility has an EHS in excess of the TPQ.

ADMINISTRATIVE CHANGE (DATE) - A plan that has prior KERC approval, however; changes that do not materially affect response operations in the event of a release of an EHS have been made during the annual review. Complete definition in “Kentucky’s TAB Q-7 Plan Development Guidance Manual”. Include the date of the administrative change(s) in the FACILITY field.

NO CHANGE - A plan that has prior KERC approval and has not been changed since its last review. Plan is currently on the county SharePoint page with a signed/dated County Title III Plan Checklist and KERC approval letter.

DELETED (DATE) – An obsolete plan that is no longer part of the County EOP. ACL includes date and reason plan was deleted. These plans do not count toward KERC fee account grant distribution formula. Include the date the plan was deleted in the FACILITY field.

RESERVED FOR FUTURE USE – Plan does not exist but space reserved for future plan. These plans do not count towards KERC fee account grant distribution formula.

NO EHS – An optional plan created by the LEPC for a facility that does not house any EHS’s. These plans do not count towards KERC fee account grant distribution formula.

***Require submission to the KERC for approval**

**** Require submission for approval w/in 60 days**

Definitions: Administrative vs. Technical

Administrative Change Definition

Administrative changes are those changes that in themselves do not materially affect response operations in the event of a release of an extremely hazardous substance. These changes include: name change of the facility, changes to telephone numbers, personnel changes, and changes to the names or numbers of affected special facilities listed for a quadrant in the vulnerable zone (unless these changes are due to a change in the radius of the vulnerable zone).

* Technical Change Definition

Technical changes are those changes that materially affect response operations in the event of a release of an extremely hazardous substance (EHS). These include changes to the type or quantity of EHS chemicals that may cause an increase or decrease in the radius of the vulnerable zone, and other changes that affect the size of the vulnerable zone. In the event of a change in the size of the vulnerable zone, corresponding sections of the Title III Plan such as Response Point, Staging Area, and Special Facilities should be reviewed to determine if and how the change has affected these sections. If Special Facilities have been added to or subtracted from quadrants due to the change in radius the drawing of the new radius should include these changes.

***Require submission to the KERC for approval**

Definitions: New vs. Under Development

* NEW – A new plan is one that is complete and has been reviewed and approved by the LEPC but has NOT been reviewed or approved by a KYEM AM or the KERC. New plans require submitting a signed EHS Facility Plan Checklist with the EHS Plan.

** UNDER DEVELOPMENT – A plan that may be complete -or- is NOT yet complete, but has not been reviewed and approved by LEPC. Under development plans have NOT been reviewed and approved by KYEM AM or KERC. 106 KAR 1:091 states that the LEPC shall submit an EHS Facility Plan to the KYEM AM within sixty (60) days of notification that the facility has an EHS in excess of the TPQ. When Under Development Plans are officially reviewed and approved by the LEPC their designation will change to NEW and will accordingly require submitting a signed EHS Facility Plan Checklist with the EHS Plan.

***Require submission to the KERC for approval**

**** Require submission for approval w/in 60 days**

EHS Facility Emergency Response Plan Submission Process:

New EHS Facility plans or existing EHS Facility Plans with technical changes require approval from a quorum of the KERC prior to their inclusion in the County EOP. The following steps are followed in the submission and approval process:

- The Plan must first be reviewed by the LEPC of the county in which the facility is located using the EHS Facility Emergency Response Plan Checklist.
- If the LEPC finds the Plan acceptable, the Checklist shall be signed by the LEPC Chair and the Plan and Checklist forwarded to the KYEM Area Manager (AM) for the county where the facility is located.
- The KYEM AM shall review new EHS Facility Emergency plans and their accompanying checklists for completeness. Plans deemed complete by the KYEM AM shall be forward them to the Chairman of the Kentucky Emergency Response Commission, or designee, within thirty (30) days of receipt from the local emergency planning committee. Plans deemed incomplete shall be returned to the local emergency planning committee with recommendations.

The AM will complete his/her portion of the Checklist and send both it and the Plan to the designated KYEM Planner for final review before presentation to the KERC Planning Committee.

The KYEM AM shall review the ACL and all EHS Facility Emergency Response Plan revisions received from the local emergency planning committee for completeness, note any recommendations and forward them to the Chairman of the Kentucky Emergency Response Commission, or designee, no later than May 1 each year.

- The KYEM Planner will send a receipt notice to the AM and the LEPC stating that the Plan has been recommended for approval and giving the dates of the KERC Planning Committee and full KERC meetings. If the Planner does not approve the Plan it will be returned with comments to the AM for correction by the preparer.
- New SARA Title III Plans and existing Plans with technical changes approved by the Committee shall be presented by the Planning Committee Chair to the full KERC during the next scheduled meeting. The KERC currently meets bi-monthly on odd months. All meeting time and locations are posted in advance at: <http://kyem.ky.gov/Who%20We%20Are/Pages/KERC.aspx>
- If the KERC accepts the EHS Facility Emergency Response Plan an approval letter signed by the Chairperson of the KERC will be sent to the LEPC Chair, KERC Chair, KERC Planning Committee, KYEM Planning Branch Manager, KYEM Planning Staff, KYEM AM & AA, County EM, and the County Judge/Executive.

If the KERC does not accept the Plan as presented a disapproval letter will be sent to the LEPC and KYEM AM.

Posting Approved Plans to SharePoint

The LEPC is the cornerstone of the Emergency Planning and Community Right-To-Know Act (EPCRA). The EHS Facility Emergency Response Plans developed by the LEPC are vital in helping communities improve chemical safety and protect public health and the environment in the unfortunate event of a HAZMAT incident.

In support of EPCRA, Kentucky Revised Statutes (KRS), and Kentucky Administrative Regulations (KAR) it is the KERCS desire to ensure all TAB Q-7 plans are available at the state level via SharePoint. This measure will afford State planners easy access to review and assist county planners and/or facilities should questions arise. More importantly, this will afford State operations, in the unfortunate event of a HAZMAT incident, virtual access to key information required to promptly and efficiently support a local response.

At the July 29th, 2015 meeting, the KERCS voted to approve a policy requiring LEPCs to post all approved EHS Facility Emergency Response Plans to their respective County SharePoint folder. Please note plans that have been officially approved by the KERCS must include:

- County Title III Plans Checklist signed by the:
 - LEPC Chair,
 - KYEM Area Manager, and
 - KERCS Commissioner

- An official approval letter signed by the Chairperson of the KERCS.

If any plan is missing either of these documents it should be considered non-approved and the LEPC should complete the review process and submit the LEPC approved plan, with checklist, to the KYEM Area Manager within 60 days.

Plan Posting Notification

This is a complete list of LEPC Planning items required. Each item is either required to be submitted directly to the KYEM AM or the KERCS Chair (or designee). In all cases the Chair's designee would constitute LEPC Program Staff in Frankfort and documents should be "submitted" in the following manner:

- 1) LEPC representative uploads documentation to County SharePoint Folder
- 2) LEPC representative emails KYEM AM and LEPC Program coordinator

Email must include specifically:

- a. which document was uploaded (xxxx)
- b. where document is located (xxxx)

KERC Approved Plan Storage

Approved plans should be maintained in several locations, including but not limited to: LEPC files, at the facility, with the fire department that would respond to an incident at the facility, in the County Emergency Operations Plan (EOP), and stored on the County SharePoint folder for access by state agencies.

Approved Plan Distribution

Every individual and entity named in the EHS Facility plan should have access to the plan.

Every individual and entity the plan dictates will take action should have access to the plan.

This includes, but is not limited to:

- Facility personnel, including the FERC
- Local EM
- Special facilities
- First responders
- Local elected officials
- LEPC Members



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Eight (8) Approved ACL Plan Status Definitions

* **NEW** – New plan that is complete and has been approved by LEPC but has never been reviewed or approved by a KYEM RRM or the KERC; requires submitting a County Title III Plan Checklist.

* **TECHNICAL CHANGE** – A plan that has prior KERC approval but, includes changes that materially affect response operations in the event of a release of an EHS; requires submitting a County Title III Plan Checklist. Complete definition in “Kentucky’s TAB Q-7 Plan Development Guidance Manual”.

** **UNDER DEVELOPMENT** - New plan that is not complete, has not been approved by LEPC, and has never been reviewed or approved by KYEM RRM or KERC. Requires submitting a County Title III Plan Checklist. 106 KAR 1:091 states that the LEPC shall submit a TAB Q-7 to the RRM within sixty (60) days of notification that the facility has an EHS in excess of the TPQ.

ADMINISTRATIVE CHANGE (DATE) - A plan that has prior KERC approval, however; changes that do not materially affect response operations in the event of a release of an EHS have been made during the annual review. Complete definition in “Kentucky’s TAB Q-7 Plan Development Guidance Manual”. Include the date of the administrative change(s) in the FACILITY field.

NO CHANGE - A plan that has prior KERC approval and has not been changed since its last review. Plan is currently on the county SharePoint page with a signed/dated County Title III Plan Checklist and KERC approval letter.

DELETED (DATE) – An obsolete plan that is no longer part of the County EOP. ACL includes date and reason plan was deleted. These plans do not count toward KERC fee account grant distribution formula. Include the date the plan was deleted in the FACILITY field.

RESERVED FOR FUTURE USE – Plan does not exist but space reserved for future plan. These plans do not count towards KERC fee account grant distribution formula.

NO EHS – An optional plan created by the LEPC for a facility that does not house any EHS’s. These plans do not count towards KERC fee account grant distribution formula.

***Require submission to the KERC for approval**

**** Require submission for approval w/in 60 days**

Definitions: Administrative vs. Technical

Administrative Change Definition

Administrative changes are those changes that in themselves do not materially affect response operations in the event of a release of an extremely hazardous substance. These changes include: name change of the facility, changes to telephone numbers, personnel changes, and changes to the names or numbers of affected special facilities listed for a quadrant in the vulnerable zone (unless these changes are due to a change in the radius of the vulnerable zone).

* Technical Change Definition

Technical changes are those changes that materially affect response operations in the event of a release of an extremely hazardous substance (EHS). These include changes to the type or quantity of EHS chemicals that may cause an increase or decrease in the radius of the vulnerable zone, and other changes that affect the size of the vulnerable zone. In the event of a change in the size of the vulnerable zone, corresponding sections of the Title III Plan such as Response Point, Staging Area, and Special Facilities should be reviewed to determine if and how the change has affected these sections. If Special Facilities have been added to or subtracted from quadrants due to the change in radius the drawing of the new radius should include these changes.

***Require submission to the KERC for approval**

Definitions: New vs. Under Development

* NEW – A new plan is one that is complete and has been reviewed and approved by the LEPC but has NOT been reviewed or approved by a KYEM AM or the KERC. New plans require submitting a signed EHS Facility Plan Checklist with the EHS Plan.

** UNDER DEVELOPMENT – A plan that may be complete -or- is NOT yet complete, but has not been reviewed and approved by LEPC. Under development plans have NOT been reviewed and approved by KYEM AM or KERC. 106 KAR 1:091 states that the LEPC shall submit an EHS Facility Plan to the KYEM AM within sixty (60) days of notification that the facility has an EHS in excess of the TPQ. When Under Development Plans are officially reviewed and approved by the LEPC their designation will change to NEW and will accordingly require submitting a signed EHS Facility Plan Checklist with the EHS Plan.

***Require submission to the KERC for approval**

**** Require submission for approval w/in 60 days**

EHS Facility Emergency Response Plan Submission Process:

New EHS Facility plans or existing EHS Facility Plans with technical changes require approval from a quorum of the KERC prior to their inclusion in the County EOP. The following steps are followed in the submission and approval process:

- The Plan must first be reviewed by the LEPC of the county in which the facility is located using the EHS Facility Emergency Response Plan Checklist.
- If the LEPC finds the Plan acceptable, the Checklist shall be signed by the LEPC Chair and the Plan and Checklist forwarded to the KYEM Area Manager (AM) for the county where the facility is located.
- The KYEM AM shall review new EHS Facility Emergency plans and their accompanying checklists for completeness. Plans deemed complete by the KYEM AM shall be forward them to the Chairman of the Kentucky Emergency Response Commission, or designee, within thirty (30) days of receipt from the local emergency planning committee. Plans deemed incomplete shall be returned to the local emergency planning committee with recommendations.

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- Special facilities
- First responders
- Local elected officials
- LEPC Members

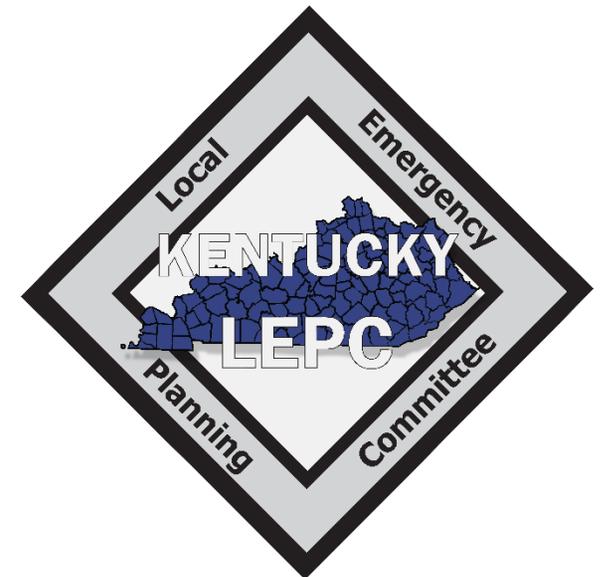


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“Serving Our Commonwealth”



2016
KERC / LEPC
Calendar of Events





“Serving Our Commonwealth”

Program Notes:

- **Module 1: “LEPCs in Kentucky”**
- **Module 2: LEPC Grant Application**
- **Module 3: Emergency Response Planning Guide for EHS Facilities**
- **Module 4: Tier2 / EHS Plan Validation Exercise**

Purpose (KERC LEPC Calendar):

This document is designed to provide LEPC members with a timeline of the grant requirements found in EPCRA, KRS, and KAR. It will also serve as a valuable tool in planning yearly LEPC meetings and Exercises. Tentative dates for the KERC meeting have been included. All LEPC Chairs are welcome to attend and encouraged to contact the KERC Program Manager to schedule agenda time for presentations regarding current LEPC events, issues, requests, and general updates of activities.

Target Audience (KERC LEPC Calendar):

The target audience for this document is any private citizen with an interest in community awareness and emergency preparedness and current members of an LEPC. Specifically, the Chair, the Vice-Chair, the Treasurer, and persons whose role with the LEPC typically includes the responsibility to complete any/all of the following forms and documents:

Annual Certification Letter
Detailed Budget
Grant Application
Grant Ledger

Membership Cover Page
Personal Property Inventory
Public Legal Notice



~ January 2016 ~

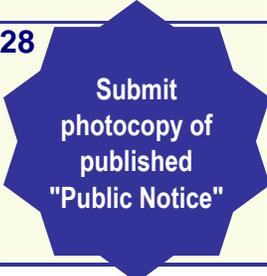


Sun	Mon	Tue	Wed	Thu	Fri	Sat
1) No later than <u>January 31</u> publish public information on committee activities entitled "Public (Legal) Notice Advertisement". 2)					1	2
3	4	5	6	7	8	9
10	11	12	13 	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
 Publish "Public (Legal) Notice Advertisement"	Notes: LEPCs must meet at least twice per year (once if no EHSs in district)					



~ February 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28 	29	1) No later than <u>February 28</u> submit to the KERC a photocopy of the "Public (Legal) Notice Advertisement" published, clearly showing the name and date of the newspaper.				



~ March 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
Facilities must submit by <u>March 1</u> : 1) Tier2 Reports 2) Facility Annual Certification Letter (FACL)		1 Facility Deadline: Tier2 Report and FACL	2	3	4	5
	6	7	8	9	10	11
12	13	14	15	16 	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	Notes - FACL must state: 1) there were no changes to EHS Plan; or 2) EHS Plan has been revised and the revisions are included with the FACL



~ April 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
Notes: No later than April 1st: 1) Review EHS Facility plans and send an ACL to the KYEM AM stating: a. that there were no changes; or b. plan has been revised and the revisions are included with the ACL 2) Submit Grant Application to the KYEM AM 3) Submit documentation of expenditures, including LEPC Bank Ledger					1 	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30



~ May 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7
8	9	10	11 	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31	Notes:			



~ June 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
Notes: No later than June 1 submit detailed budget to the KERC or designee, identifying how the funds requested on the Grant Application are to be spent.			1 Submit Detailed Budget	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	Notes:	



~ July 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
Notes:					1	2
3	4	5	6	7	8	9
10	11	12	13 	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31	Notes:					



~ August 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31	Notes:		



~ September 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
Notes: No later than <u>September 15</u> the KERC will make the grant awards.				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15 	16	17
18	19	20	21 	22	23	24
25	26	27	28	29	30	Notes:



~ October 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
Notes:						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31	Notes:				



~ November 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
Notes:		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16 	17	18	19
20	21	22	23	24	25	26
27	28	29	30	Notes:		



~ December 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
No later than <u>December 1</u> submit to the KERC: 1) Updated membership list and cover page 2) Bylaws, with certification stating: a. There were no changes; or b. They have been revised and the revisions are included 3) Personal Property Inventory for all items valued > \$500.00				1 Submit: Member list w/ cover page, Bylaws, Property Inventory	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

Please do not hesitate to contact any of the KYEM Staff if you have any questions:

HAZMAT Program Coordinator

Danita Farrier

Kentucky Emergency Management (KYEM)

Boone Center National Guard

EOC Room 209-P-5

110 Minuteman Parkway

Frankfort, KY 40601

Office: 502-607-5728

Fax: 502-607-1622

danita.e.farrier.nfg@mail.mil

LEPC Program Coordinator

Connie Estill

Kentucky Emergency Management (KYEM)

Boone Center National Guard

EOC Room 210-P-5

110 Minuteman Parkway

Frankfort, KY 40601

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Fax: 502.607.1008

connie.g.estill.nfg@mail.mil

tier2kyem@gmail.com

LEPC Program Manager

David M Davis

Kentucky Emergency Management (KYEM)

Boone Center National Guard

EOC Room 210-P-6

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Frankfort, KY 40601

Office: 502.607.5712

Fax: 502.607.1008

david.m.davis200.nfg@mail.mil

kentuckyserc@gmail.com



Active Local Emergency Planning Committee Checklist



1. Identification of Hazards		
YES	NO	a) Our LEPC has identified facilities with extremely hazardous substances.
YES	NO	b) Our LEPC has identified facilities with hazardous chemicals.
YES	NO	c) Our LEPC has identified major transportation routes for extremely hazardous substances.
YES	NO	d) Our LEPC has identified other facilities contributing to or subjected to risk that are in close proximity to those facilities with extremely hazardous substances or hazardous chemicals.
2. Approved EHS Plan within the County Emergency Operations Plan		
YES	NO	a) Our LEPC has included emergency response information for those facilities identified above in our County Emergency Operations Plan.
YES	NO	b) Our LEPC has included emergency response methods and procedures of first responders into our County Emergency Operations Plan.
YES	NO	c) Our LEPC has included emergency response measures used by medical personnel in our County Emergency Operations Plan.
YES	NO	d) Our LEPC has identified emergency equipment available in the community and at the facilities identified above, as well as the persons responsible for them, and has included this information in our County Emergency Operations Plan.
YES	NO	e) Our LEPC has established plans for shelter-in-place or evacuation. It has established early warning systems and has identified emergency shelters. This information has been included in the County Emergency Operations Plan.
YES	NO	f) Our LEPC has identified emergency coordinators within the community and at facilities having extremely hazardous substances that will be responsible for implementing the County Emergency Operations Plan. This information is included in our County Emergency Operations Plan.
3. Implementing the Local Emergency Plan		
YES	NO	a) Our LEPC has established notification procedures by which facility coordinators, identified in 2f, will notify first responders in the event of an extremely hazardous substance emergency.
YES	NO	b) Our LEPC has established notification procedures by which the public will be notified in the event of an extremely hazardous substance emergency.
YES	NO	c) The County Emergency Operations Plan describes the incident command system to be used in responding to hazardous chemical emergencies.



Active Local Emergency Planning Committee Checklist



4. Hazard Analysis		
YES	NO	a) Our LEPC has established a process to identify and record releases of extremely hazardous substances.
YES	NO	b) Our LEPC has established a process to determine the level of risk if extremely hazardous substances are involved in an accident.
YES	NO	c) Our LEPC has established a process to determine the areas and populations that will be affected in the event that extremely hazardous substances are released.
5. Emergency Response Exercises		
YES	NO	a) Our LEPC has developed emergency response drills and exercises to evaluate the effectiveness of our County Emergency Operations Plan.
YES	NO	b) Our LEPC has established a schedule to regularly conduct drills and emergency response exercises.
6. LEPC Organizational Maintenance		
YES	NO	a) Our LEPC regularly schedules, announces, and holds meetings. (Twice a year if EHS present in county)
YES	NO	b) Our LEPC annually reviews, and revises if necessary, EHS Facility Plans.
YES	NO	c) Our LEPC regularly conducts exercises and tests emergency procedures.
YES	NO	d) Our LEPC has developed procedures for responding to inquiries concerning extremely hazardous substances in the community.
YES	NO	e) Our LEPC regularly submits documentation required to comply with KERC grant guidelines.
7. Facility Compliance		
YES	NO	a) Our LEPC actively seeks to increase the number of facilities in our community that must annually report extremely hazardous substances or hazardous chemicals. (EHS Plans, Tier2's, & MSDS's)
YES	NO	b) Our LEPC regularly contacts each reporting facility to promote better understanding of EPCRA requirements by the facility owner or operator.
YES	NO	c) Our LEPC provides both basic and detailed EPCRA information to new businesses.
8. Public Awareness		
YES	NO	a) Our LEPC develops articles about EPCRA and prints a "Public (Legal) Notice Advertisement" for local news releases.
YES	NO	b) Our LEPC provides public service announcements concerning EPCRA to local radio and television stations.