



INTEGRATED CONTINGENCY PLAN ("ONE PLAN") GUIDANCE

FACTSHEET



The National Response Team (NRT) has developed Integrated Contingency Plan (ICP) Guidance. This guidance (also known as "one plan" guidance) provides a way to consolidate multiple plans that a facility may have prepared to comply with various regulations, into one functional emergency response plan. The ICP Guidance resulted from recommendations in the December 1993 NRT Report to Congress: *A Review of Federal Authorities for Hazardous Materials Accident Safety*. The NRT received input from representatives from state and local agencies, industry, and environmental groups prior to developing the guidance.

WHICH AGENCIES DEVELOPED THE ICP GUIDANCE?

Five agencies signed the one-plan guidance: The Environmental Protection Agency (EPA), the Coast Guard, the Occupational Safety and Health Administration (OSHA), the Office of Pipeline Safety of the Department of Transportation (DOT), and the Minerals Management Service (MMS) in the Department of the Interior. The NRT and the agencies responsible for reviewing and approving federal response plans to which the ICP option applies

The National Response Team announced the "one-plan" guidance for integrated contingency planning in June 1996. EPA and four other agencies signed the guidance, which gives facilities a common-sense option for meeting multiple emergency planning requirements under nine different regulations. The guidance is an outgrowth of the 1994 Presidential review of federal authorities related to hazardous materials accident prevention, mitigation, and response. That review identified multiple and overlapping facility emergency response plans as a problem area. Within the guidance document is a core facility response plan for releases of oil and hazardous substances. Plans prepared by facilities in accordance with the guidance will satisfy requirements of the five participating agencies and will be the federal preferred method of such planning. This one-plan approach will minimize duplication of effort and unnecessary paperwork burdens.

agree that integrated response plans prepared in accordance with this guidance will be acceptable and will be the federally preferred method of response planning.

WHAT IS THE PURPOSE OF THE ICP GUIDANCE?

The ICP Guidance is to:

- ◆ Provide a mechanism for consolidating multiple facility response plans into one plan that can be used during an emergency
- ◆ Improve coordination of planning and response activities within the facility and with public and commercial responders
- ◆ Minimize duplication and simplify plan development and maintenance

WHICH REGULATIONS DOES THE ICP GUIDANCE COVER?

Rather than a regulatory initiative, the ICP document is guidance. It presents a sample contingency plan outline that addresses requirements of the following federal regulations:

- ◆ The Clean Water Act (CWA) (as amended by the Oil Pollution Act [OPA]) Facility Response Plan Regulations (EPA, Coast Guard, DOT, MMS)
- ◆ EPA's Risk Management Program Regulation, Oil Pollution Prevention Regulation, and the Resource Conservation and Recovery Act (RCRA) Contingency Planning Requirements
- ◆ OSHA's Emergency Action Plan Regulation, Process Safety Management Standards, and the Hazardous Waste Operations and Emergency Response (HAZWOPER) Regulation

WHICH FORMAT?

A facility may use the ICP sample format or use an alternate format. The ICP sample format includes the following three sections:

- ◆ Plan introduction

- ◆ A core plan that serves as the primary response tool
- ◆ A series of annexes that provide more detailed supporting information and regulatory compliance documentation

The ICP sample format is based on the Incident Command System (ICS). Organizing an integrated contingency plan according to the structure of the ICS will allow the plan to dovetail with established response management practices. This should promote its usefulness in an emergency.

CROSS-REFERENCES

The ICP Guidance supports the use of linkages (i.e., references) to facilitate coordination with other facility plans and with external plans such as local emergency planning committee (LEPC) plans and OPA Area Contingency Plans. When a facility submits a plan for federal agency review, it must provide a table indicating where the regulatory required elements can be found in the one-plan format. The ICP Guidance includes tables that cross-reference the requirements of individual regulations with the ICP sample format.

The NRT intends to continue promoting the use of the ICP Guidance by regulated industries and encourages federal and state agencies to rely on the ICP Guidance when developing future regulations.

FOR MORE INFORMATION...

The ICP Guidance was published in the *Federal Register* on June 5, 1996 (61 FR 28642). For copies and more information, call the RCRA, Superfund, and EPCRA Hotline: (800) 424-9346 (TDD: (800) 553-7672). In the Washington, DC area, call the Hotline at (703) 412-9810. The ICP Guidance is also available on EPA's Chemical Emergency Preparedness and Prevention Office website at <http://www.epa.gov/swercepp/pub/one-plan.html>.

For questions on the interface of the ICP Guidance with specific regulations, call the contact listed for that particular regulation:

Coast Guard Facility Response Plan Regulation: LCDR Mark Hamilton, (202) 267-1983

DOT/Research and Special Programs Administration (RSPA) Pipeline Response Plan Regulation: Jim Taylor, (202) 366-8860

EPA Oil Pollution Prevention Regulation: Dana Stalcup, (703) 603-8735 or the Spill Prevention, Control, and Countermeasures (SPCC) Information Line at (202) 260-2342

OSHA regulations and standards: Contact either your regional or area OSHA office

MMS Facility Response Plan Regulation: Larry Ake, (703) 787-1567

EPA Risk Management Planning Regulation: William Finan, (202) 260-0030

RCRA Contingency Planning Requirement: Contact the RCRA, Superfund, and Emergency Planning and Community Right-to-Know Act (EPCRA) Hotline (see above)