



**CLERMONT  
COUNTY<sub>OHIO</sub>**  
**Local Emergency Planning Committee**

# **2025 Clermont County Hazardous Materials Annex (#10)**

Adopted by the LEPC: September 25, 2025

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**Clermont County Local Emergency Planning Committee**  
**Resolution # 01-25**

Whereas, the Clermont County Local Emergency Planning Committee has completed the required update of the County Chemical Emergency Response Plan in accordance to the Superfund Amendment and Reauthorization Act, Title III, Emergency Planning and Chemical Right-to-Know Program of 1986 and the Ohio Revised Code sections 3750 and 5502; and,

Whereas, The State Emergency Response Commission has directed the various County Local Emergency Planning Committee to forward local plans to the Ohio Emergency Management Agency for all review; and,

Whereas a majority of Clermont County's Local Emergency Planning Committee has reviewed and does concur with this plan effective until October 17, 2025 as it is to be submitted.

Now, Therefore, Be It Resolved, that the Clermont County Local Emergency Planning Committee hereby finds the County's Chemical Emergency Response Plan to be ready for annual review by the State Emergency Response Commission and with the concurrence does forward this plan, with all appropriate enclosures, to the Ohio Emergency Management Agency requesting an annual review.

Record of Motion: Moved by: Jeanette Nichols  
Seconded by: Tim Neyer

Yea: All in favor  
Nay: None

I hereby certify this resolution was approved by a majority of the Clermont County Local Emergency Planning Committee, as provided by the By-Laws and Constitution of that body, this 25th day of September 2025.

Pam Haverkos

Pam Haverkos, Chair  
Clermont County LEPC

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## Record of Changes

Page #	Initiated by	Section	Type	Description of Change
1	Haverkos	Title Page	Changes	Updated plan year and date of plan adoption
5	Haverkos	Resolution	Changes	Updated Resolution year, date of anticipated adoption by the LEPC, date due to SERC, and removed the 2024 record of motion.
10	Haverkos	Situation	Changes	Updated the number of EHS and HS reporting facilities
17	Haverkos	Local Responsibilities	Changes	Amended Water/Wastewater responsibilities; Removed Office of Environmental Quality and added Water Resources
18	Haverkos	EHS/HS Facility Responsibilities	Change	Updated the number of EHS and HS reporting facilities.
29	Haverkos	Recovery	Change	Removed Office of Environmental Quality and added Water Resources
Tab A	Haverkos	EHS Site Assessments	Additions, Deletions	Updated map with 2024 Tier II EHS reporting facilities. Updated EHS hazard vulnerability analysis based on Tier II reports
Tab B	Haverkos	HS Site Information	Additions, Deletions	Updated map with 2024 Tier II HS reporting facilities. Updated HS site information based on Tier II reports
Tab F	Haverkos	Spill History	Changes	Updated spill records
Tab G	Haverkos	Membership Roster	Additions, Deletions	Updated 2025-2027 Membership information.
Tab K	Haverkos	Notifying the Public	Additions, Deletions	
Tab L	Haverkos	Hazmat Capability Resource List	Additions Deletions	Updated resources available

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# Hazardous Materials Annex (#10)

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Lead Agencies	Local Fire Departments Greater Cincinnati HazMat Unit
Support Agencies	Local Police Agencies Clermont County EMA & LEPC

## Purpose, Scope, Situation and Assumptions

### Purpose

This annex describes the chemical emergency response and preparedness activities within the County. This annex identifies the roles, responsibilities, and working relationships between governmental agencies, industry, private sector, and non-profit partners. The intent is to:

- Protect lives, property, and the environment by developing emergency operation plans that mitigate, prepare for, respond to, and recover from planned and unplanned chemical releases/spills whether natural, accidental, or human-caused; and
- Restore the impacted area to pre-incident status with minimal social and economic disruption.

### Scope

This annex was developed by the Clermont County Local Emergency Planning Committee (LEPC) in accordance with Ohio Revised Code (ORC) Chapter 3750 and per the rules adopted by the State Emergency Response Commission (SERC). This annex provides the organizational structure for responding to releases of hazardous materials and describes the interface between the local jurisdictions, Clermont County, regional partners, the State of Ohio and the federal government, which will respond under the Ohio Emergency Operations Plan and the National Response Framework (NRF).

### Situation

Clermont County is at risk for a hazardous material release and/or spill from a fixed facility or during transport of an extremely hazardous substance (EHS) or hazardous substance (HS). Sources of hazardous material releases/spills include: release/spill at a fixed facility; rupture/puncture of underground tanks and/or pipelines; transportation accidents, illegal dumping, chemical misapplication and incidents caused by natural, technological, or human caused disasters.

#### EHS Facilities

Clermont County has 46 reporting facilities that process, use, and/or store extremely hazardous substances. Tab A provides a Hazard Vulnerability Analysis of each reporting facility.

#### HS Facilities

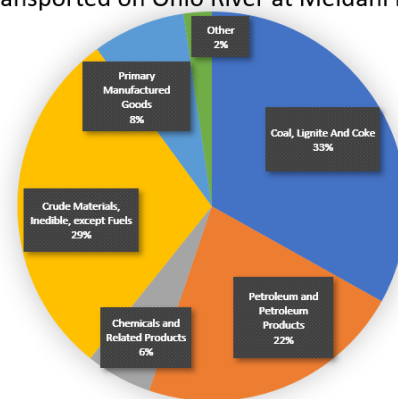
Clermont County has 93 reporting facilities that process, use, and/or store more than 10,000 pounds of a hazardous substance.

## Transportation Considerations

Hazardous materials are transported into and through Clermont County every day via automobiles/trucks, railcars, aircraft, pipelines, and boats/barges.

- Roadways: Interstate 275 connects Clermont County to Hamilton County to the west and Warren County to the North. This beltway provides an opportunity for hazardous materials to be rerouted from Interstate 71 and Interstate 75 around the City of Cincinnati. The County has major east-west arteries including U.S. 52, State Route 125, State Route 32, U.S. 50 and State Route 28 which connects Clermont to Brown County and Hamilton County.
- Railroads: Norfolk Southern operates a rail line that runs east-west across the center of the county. Indiana & Ohio Railway operates a line that cuts through the northwest corner of the County. The county could also be impacted by the CSX rail line that runs along the Ohio River and parallel to Kentucky 8 in Northern Kentucky.
- Air traffic: Clermont County has an airport located at 2001 Sporty's Drive, Batavia, Ohio 45103. With the large agricultural base of the County, planes and helicopters are used for application of fertilizers and other substances on farmland.
- Pipelines: The County has one (1) pipeline traversing, starting, or stopping within its borders. These pipelines carry natural gas on a regular basis.
- Ohio River: The Ohio River is a major transportation connector to the Mississippi River. In 2023, the top five commodities transported on the Ohio River were: Coal, Lignite, and Coke; Crude Materials and Inedibles; Petroleum and Petroleum Products; Primary Manufacturing Goods; Chemicals and Related Products; and Other.<sup>a</sup>

2023 Percentage of Commodities Transported on Ohio River at Meldahl Dam



U.S. Army Corps of Engineers Lock Performance Monitoring Tons Report, <https://ndc.ops.usace.army.mil/ords/f?p=108:6:::>, accessed July 2, 2024.

## Assumptions

- All facilities in Clermont County that process, use, and/or store EHS in excess of the chemical specific threshold planning quantity (TPQ) or 500 pounds submit an annual chemical inventory report form to the LEPC by March 1<sup>st</sup>.
- All facilities in Clermont County that process, use, and/or store 10,000 pounds of a hazardous chemical submit an annual chemical inventory report form to the LEPC by March 1<sup>st</sup>.
- The LEPC assumes that the information submitted on the chemical inventory form is factual and accurate.
- The Hazard Vulnerability Analysis (HVA) is completed using the worst-case scenario for each facility based on the maximum amount of chemicals reported at the facility; the likelihood of a release; and the consequences of a release based on U.S. Environmental Protection Agency (USEPA), Federal Emergency Management Agency (FEMA), and U.S. Department of Transportation (USDOT), *Technical Guide for Hazard Analysis*.
- The weather conditions at an accident/release/spill location will vary on any given day. The average winds in the County are from the southwest at 3-5 mph.
- Population estimates are variable based on time of day and day of the week.

## Concept of Operations

In the event of a chemical incident within Clermont County, the Clermont County Emergency Operations Plan (EOP)

<sup>a</sup> U.S. Army Corps of Engineers Lock Performance Monitoring, Meldahl Dam Ton Report, <https://ndc.ops.usace.army.mil/ords/f?p=108:6:::>, Accessed July 2, 2024.

and the Hazardous Material Annex will be activated.

## **Mitigation**

Clermont County has initiated the following mitigation activities:

- Annually reviews and updates the Hazardous Materials Annex and the HVA for the reporting EHS facilities and HS facilities.
- Implemented zoning and/or land use laws that include controls on locating EHS and HS sites in or near residential communities. Washington Township is the exception.
- The Clermont County Building Department enforces applicable standards of the Ohio Building Code and the Ohio Fire Code.
- The fire departments carry out fire safety inspections and enforcement actions based on the Ohio Fire Code, the Clermont County Life Safety Code and any local codes. The frequency of these inspections is dependent upon department staffing and funding, so there is a wide variation in the level of enforcement throughout the County.

## **Preparedness**

### **Mutual Aid Agreements**

As per 3750.04 (A) (10) all fire, EMS, and law enforcement agencies in Clermont County subscribe to the countywide mutual aid compact. Many public safety departments also have mutual aid compacts with neighboring jurisdictions. The State of Ohio has adopted the Intrastate Mutual Aid Compact (IMAC), ORC 5502.41, for county to county aid within the state. The Federal Government has adopted the Emergency Mutual Aid Compact (EMAC), Public Law 104-321, ORC 5502.40, for State to State aid within the United States.

Clermont County maintains a contract with the Greater Cincinnati Hazardous Materials Unit (GCHMU) which is a State recognized Type I HazMat Team.

In the event that local resources and GCHMU capabilities are exceeded, additional resources may be requested through regional mutual aid partnerships. The Southwest Ohio Region has 2 additional Type I HazMat Teams (Cincinnati Fire Department and Butler County HazMat Team).

If regional capabilities are exceeded, additional resources can be requested through the Ohio Fire Chiefs' Association's Ohio Fire Service Emergency Response System (ORS). The ORS provides local fire chiefs with easy access to large quantities of fire services resources (hazmat, water rescue, fire response resources, emergency medical, incident management assistance, etc.). This system provides for rapid activation and response of fire service resources in quantities beyond the means of a single fire department or local mutual aid.

To request resources through the ORS, the local jurisdiction or Communication Center would contact the Central Dispatch Center at 1-888-822-4900. The requesting agency would need to provide the following information:

- Name of the affected jurisdiction and name of fire department
- Name of calling entity
- Name and rank of caller
- Call back number and fax number
- Incident Commander name, rank, and department
- Specific type of emergency, if known (chemical, biological, radiological, transportation, or fixed site)
- Level of hazmat team needed (Type I, II, or III)

- Location of Staging Area
- Type of response requested (teams in route within 30 minutes or 3 hours)
- Local radio frequency and/or Multi-Agency Radio Communication System (MARCS) radio channel
- Phone/cell phone number for Incident Command
- Any specific equipment requests.

## Training

The County's emergency response personnel train to meet the required standards in accordance with Superfund Amendment and Re-Authorization Act (SARA) Title I, Section 126. The minimum level of training for emergency response (Fire, EMS, and Law) personnel is Hazardous Materials Awareness. Emergency responders are trained to the appropriate National Incident Management System (NIMS) level.

In accordance with Occupational Safety and Health Administration (OSHA) standards, each employer shall maintain appropriate documentation of his/her personnel's training.

### Training Sources:

- GCHMU can provide training to any and all emergency responders within Clermont County. This unit provides certified hazmat instructors, and all necessary equipment and supplies needed. This training, provided without charge, is available upon request to GCHMU, Inc. to any fire department or emergency response agency within Clermont County.
- Local universities and vocational schools offer Hazardous Materials Awareness, Operations and Technician level training. The Southern Ohio Fire and EMS School annually conducts a multi-county fire/EMS training school that includes courses related to EHS and HS response.
- The State Fire Marshal's Outreach Program provides training, at all levels, to be taught within the County at the County's request. These courses are designed primarily for county and facility personnel alike.
- The Ohio Fire Academy provides specific courses for Hazardous Materials. They include courses such as Chlorine Emergencies, Pesticide Challenge, and Chemistry of Hazardous Materials. Employers send their people directly to the academy for this training in Reynoldsburg, Ohio or training programs can be held within the local jurisdiction and is coordinated at the local level.
- The Ohio Emergency Management Agency (Ohio EMA) provides the FEMA approved Hazardous Materials Contingency Planning course, and provides instruction on conducting hazard vulnerability analysis, exercising emergency plans, and other basic emergency preparedness courses.
- The Federal Emergency Management Agency (FEMA) provides emergency planning and response courses online, at the Emergency Management Institute (EMI) in Emmittsburg, Maryland and through the National Domestic Preparedness Consortium including:
  - Center for Domestic Preparedness (CDP), Anniston, Alabama; Concentration: chemical, ordinance, biological, and radiological incidents;
  - The Energetic Materials Research and Testing Center (EMRTC), New Mexico Tech; Concentration: explosives, live explosives, and incendiary devices;
  - National Center for Biomedical Research and Training (NCBRT), Louisiana State University; Concentration: weapons of mass destruction, counter-terrorism, and high consequence events;
  - National Emergency Response and Rescue Training Center (NERRTC), Texas A&M Engineering Extension Service (TEEX), College Station, Texas; Concentration: cybersecurity, crisis communication, executive and elected official education, hazmat awareness and operations, health and medical services, incident management, infrastructure protection, search and rescue, threat and risk assessment, and training gap analysis;

- National Nuclear Security Administration/CTOS – Center for Radiological/Nuclear Training (NNSA/CTOS), Nevada National Security Site; Concentration: weapons of mass destruction, radiological, and nuclear;
- National Disaster Preparedness Training Center (NDPTC), University of Hawaii; Concentration: natural hazards
- National Center for Emergency Response for Surface Transportation (NCERST); Concentration: surface transportation of hazardous materials and weapons of mass destruction.

#### **Training Program:**

At the request of local agencies or facilities, the LEPC will coordinate training. Most classes are free of charge. Classes are open to all agencies and all facilities. Course announcements are distributed via e-mail and shared at public meetings. Clermont County coordinates with the Regional EMA's and the Ohio EMA to offer emergency management classes. These classes are open to all departments and facilities.

The effectiveness of the training program is measured by the annual LEPC exercise. The evaluation, after action report (AAR), and corrective actions plan (CAP) are used to identify and correct any gaps found in the training program.

#### **Public Education**

The LEPC and EMA provide public education and outreach presentations upon request. Preparedness information can also be found on the EMA website at: <http://ema.clermontcountyohio.gov/preparedness/>

#### **Assignment of Responsibilities**

The Clermont County EOP outlines the capabilities of local, state and federal agencies during emergency situations. This annex specifically addresses the capabilities needed to respond to hazardous material releases, spills, and leaks. The implementation of this annex will be in conjunction with the execution of the EOP base plan, functional annexes and hazard specific annexes.

#### **Local Agencies**

##### **American Red Cross**

The Mass Care Annex (#6) of the EOP provides a detailed description of mass care and sheltering capabilities. In the event that a large section of the community needs to be evacuated, The Cincinnati Area Chapter of the American Red Cross will set up a temporary shelter location(s) and provide mass care stations. The American Red Cross will also assist with welfare inquiries and feeding of emergency workers. The American Red Cross may also provide mental health support.

##### **Communication Centers**

Clermont County has 3 Communication Centers. The primary communication center is the Clermont County Department of Public Safety Services, covering the majority of the County with the exception of Union Township, City of Milford, and the City of Loveland. The Northeast Communication Center covers the City of Loveland. The Union Township Communication Center covers Union Township. The City of Milford is covered by the Hamilton County Communication Center. The non-emergency numbers are listed below.

- |  |              |
|--|--------------|
| • Clermont County Department of Public Safety Services | 513.732.2231 |
| • Northeast Communication Center                       | 513.677.7000 |
| • Union Township Communication Center                  | 513.752.1230 |

- Hamilton County Communication Center 513.825.2280

All three Communication Centers can distribute emergency alert notifications to the public and media outlets using the outdoor warning sirens. Clermont County DPSS can send out messages using OnSolve CodeRed which disseminates messages through the Emergency Alert System (EAS) and the Integrated Alert and Warning System (IPAWS).

### **Emergency Medical Services (EMS)**

The Fire/EMS Annex (#4) of the EOP provides a detailed description of EMS capabilities. In a HazMat incident EMS would:

- Establish a triage system to prioritize patients based on the severity of their condition
- Provide treatment of patients impacted by the release, spill, or leak
- Transport patients to the appropriate medical facilities
- Notify receiving medical facilities of the incident and incoming patients
- Track patients and communicate where patients have been transported
- Provide medical monitoring of on-scene personnel
- Inform Incident Command of any injuries to responding personnel

### **Emergency Management Agency (EMA)**

The EMA can provide additional logistical support in a large scale hazmat incident. The EMA can activate the County Emergency Operation Center (EOC) to assist with the coordination of outside resources.

The EMA Director serves as the LEPC Community Emergency Coordinator. The role of the LEPC Emergency Coordinator is to notify the proper authorities at the county and state levels, support the Incident Commander and establish the operation of the EOC if necessary. The LEPC Emergency Coordinator and LEPC staff can also assist with plume modeling and weather tracking.

### **Fire Service**

The Fire/EMS Annex (#4) of the EOP outlines the firefighting and rescue capabilities. All Clermont County fire personnel have received a minimum of awareness level training. Many responders have received additional training and have gained experience from responding to hazardous materials incidents in the past.

The first arriving Fire Department Officer will direct the following:

- Activate the Hazardous Materials Annex (#10)
- Establish Incident Command System
- Take immediate steps to identify the nature of the hazardous material by using SDS, ODOT Emergency Response Guide, CAMEO software, CHEMTREC, etc.
- Report the initial response level to the local Communication Center
- Initiate appropriate action to control and eliminate the hazardous material and sustain operations as long as necessary
- Apply appropriate firefighting/spill containment techniques.
- Ensure that no action is taken to flush or wash contaminants into waterways or the storm drain system until approval is obtained.
- Determine a safe route into the area and relay to the local Communication Center

The Incident Commander will:

- Ensure local Communication Center has been notified of the incident

- Determine, confirm and advise the local Communication Center of the incident response level
- Confirm that Ohio EPA and LEPC Emergency Coordinator have been notified per ORC 3750.06
- Request specialized hazmat teams (GCHMU), if warranted.
- Establish the exclusion zones
- Establish staging areas upwind at a safe location
- Determine population protective actions and designate an evacuation zone, if necessary
- Establish a Public Information Officer (PIO) and initiate public notification, if applicable
- Request appropriate resources and support services
- Coordinate all emergency and support activities
- Rescue any injured persons
- Maintain overall command of the emergency scene until the hazard is contained or until command can be passed to an appropriate agency
- Establish a Unified Command Post, if warranted
- Promptly identify the hazardous material and disseminate this information to appropriate emergency agencies and citizens in the area of incident.
- Obtain assistance from the Safety Officer to determine the hazards involved and the proper limits of an evacuation zone, if appropriate.
- Ensure that all department representatives at the Unified Command Post are informed of the evacuation zone and of the need, where appropriate, for evacuation.
- Assist police by providing protective clothing and breathing apparatus, if appropriate.
- Determine when the zone is safe for reentry.

Other arriving departments, personnel, or mutual aid will:

- Respond to the Incident Commander or staging area as directed by dispatch
- Follow established procedures within the limits of their training and equipment.

### Greater Cincinnati HazMat Unit (GCHMU)

If the spill/leak/release exceeds the capabilities of the local fire department, the Incident Commander (IC) may request specialty hazmat capabilities through the GCHMU. The IC will make the request through the Local Communication Center. The local Communication Center will contact the Hamilton County Communication Center to notify the GCHMU Duty Officer.

The Duty Officer will contact the IC and determine the level of response needed.

- **Administrative Consultation** – IC requests resources and information such as contact with a chemist, clean-up contractor, etc.
- **Administrative Response** – Duty Officer responds to the scene and provides mitigation expertise. Chemists and other specialty personnel may be called upon to respond or provide information.
- **Full Team Response** – Response by Duty Officer, Chemists, Technicians, and apparatus. Entry will be made by technicians.

Once a senior representative of the GCHMU arrives on scene, they will report to the Unified Command Post and:

- Provide resources to identify the type and degree of the hazard involved;
- Provide assistance or advice on responder and population protective actions required.
- Advise on the proper method for containing, neutralizing, or removing the hazardous material.

### Hospitals

The Health and Medical Annex (#8) of the EOP provides a detailed description of hospital capabilities. In a HazMat

incident the individual hospitals that are receiving patients may set up decontamination stations outside of the emergency departments prior to patients being admitted into the hospitals.

### **Law Enforcement**

The Law Enforcement Annex (#13) of the EOP provides a detailed description of Law Enforcement capabilities during an emergency. In a HazMat Incident Law Enforcement would assist in the following areas:

- Assume a role in the Unified Command (ranking law enforcement officer)
- Establishing a safe perimeter zone
- Traffic and crowd control
- Evacuation notification
- Scene Security

### **Public Health**

The Health and Medical Annex (#8) of the EOP provides a detailed description of public health capabilities during an emergency. In a HazMat incident the Clermont County Public Health would assist in the following areas:

- Report to the Unified Command Post
- Offer a medical estimate of the situation based on his/her expertise on the materials involved and provide actions that can be taken.
- Provide resources to determine the identity of the hazardous material and assist in establishing the type and degree of the hazard involved.
- Provide assistance or advice on the public protective actions required.

### **Public Information**

The Emergency Public Information Annex (#15) of the EOP provides a detailed description of public information capabilities during an emergency. The PIO will disseminate information to the media and the public.

### **Public Works (e.g. County Engineer, Local Service/Road Department)**

The Public Works Annex (#3) of the EOP provides a detailed description of public works capabilities during an emergency. If warranted, the senior Public Works Official at the scene will report to the Unified Command Post and assist with the following:

- Provide material for building dikes to contain liquids and absorb hazardous materials.
- Cooperate with police to establish an efficient detour with the appropriate signs, arrows, and personnel to expedite movement of traffic.

### **Utilities (e.g. electric, natural gas, cable, telephone, water/waste water)**

The utility providers will be notified and work in conjunction with the Fire Department to ensure life safety issues are immediately addressed. The provider will coordinate all personnel and equipment resources with the IC and will provide technical expertise concerning the potential risks and hazards within the cold, warm and hot zones.

### **Water/Waste Water Utilities**

The Water Resource Director will provide for monitoring environmental conditions within Clermont County and characterizing the processes that may impact the environment.

Water purveyor(s), when requested, should:

- Provide information/maps on which water systems could be impacted by the release.
- React to the entry of contaminant into the water supply by shutting off appropriate intakes or switching to alternate sources;



- Cooperate with Public Health, Ohio EPA, and/or U.S. EPA directions to neutralize or eliminate pollutants that have entered the water supply system.

## **EHS/HS Facility Owners/Operators and Transporters**

### **Fixed Facility Owner/Operators**

Clermont County has 46 reporting facilities that process, use, and/or store extremely hazardous substances (EHS) and 93 reporting facilities that process, use and/or store hazardous substances. Per the Emergency Planning Community Right-to-Know Act (EPCRA) of 1986, commonly referred to as, Superfund Amendments and Reauthorization Act (SARA), Title III: EHS and HS facilities must:

- Submit a Tier II facility report to the local fire department, LEPC, and the State Emergency Response Commission (SERC) by March 1<sup>st</sup> of each year.
- Designate a Facility Emergency Coordinator
- Develop an on-site contingency plan in accordance with OSHA 1910.120, which specifies notification and emergency response procedures.
- Provide a facility site map – per ORC 3750.

ORC 3750.06 requires the Facility owner/operator or transporter to initiate emergency notification procedures within 30 minutes of a known spill or release. The notifications should include:

- The local fire via the 9-1-1 system;
- The LEPC Emergency Coordinator via the 9-1-1 system or 513-732-7661.
- Ohio EPA – the 24-hour spill/release reporting number is 1-800-282-9378

During a release, the facility owner/operator or transporter should:

- Provide the SDS and/or shipping manifests for of all hazardous materials
- Provide a technical support to the Command Post or the EOC, as needed
- Coordinate public information messages with the Incident PIO

Following a chemical spill/release, the Facility owner/operator or transporter shall submit a written report to the LEPC and the Ohio EPA within 30 days of the incident. The report must include the following:

- Actions taken to respond to and contain the release
- Any known or anticipated acute or chronic health risks associated with the release
- Advice regarding medical attention necessary for individuals exposed to the substance released (when applicable)
- A summary of all actions taken by the owner or operator to prevent a recurrence of the release

### **Rail and Highway Carriers**

All EHS and HS Transporters should develop a chemical incident response plan. Transporters should maintain a response capability in the event of a hazardous material accident involving rolling stock. Transporters should participate in local training and exercises relevant to chemical releases.

### **Pipeline Operators**

All pipeline operators should have a plan that outlines the policies to be followed in the event of a chemical release incident. Pipeline operators should participate in local training and exercises relevant to chemical releases.

## State Agencies

Multiple State Agencies may provide personnel, equipment and technical support during a hazmat incident. The State's role is defined in detail in the State of Ohio's Emergency Support Function (ESF) #10 Oil, Gas, and Hazardous Materials (June 2019)

([https://www.ema.ohio.gov/Documents/Ohio\\_EOP/EOP\\_Overview/ESF10\\_Oil\\_Gas\\_and\\_Hazardous\\_Materials.pdf](https://www.ema.ohio.gov/Documents/Ohio_EOP/EOP_Overview/ESF10_Oil_Gas_and_Hazardous_Materials.pdf))

### Ohio Department of Health (ODH)

- Assists local health departments in ensuring the restoration of public health and sanitation.
- Investigates potential health problems stemming from releases.
- Assists in ensuring the safety of private water supply sources.
- Assists with coordinating the safety and health of shelters used during a response.

### Ohio Department of Natural Resources (ODNR)

- Responsible for maintaining the State lands.
- Can provide damage assessment teams (field inspectors or geologists)
- Can provide watercraft for related operations and assist in sheltering

### Ohio Department of Transportation (ODOT)

- Regional offices can supply personnel and equipment to support cold zone operations
- Assists with designating alternate traffic routes
- Provides traffic control devices
- Provides technical assistance regarding road conditions

### Ohio Emergency Management Agency (Ohio EMA)

- Co-Chairs the SERC and serves as the SERC exercise facilitator by providing planning, training, and exercise guidance.
- Develops and implements the State's Hazardous Materials Emergency Management Plan which includes the State's roles for mitigation preparedness, response, and recovery.
- Coordinates requests for State/Federal assistance from local political subdivisions.
- Activates and maintains the State EOC, as needed.

### Ohio Environmental Protection Agency (Ohio EPA)

- Co-Chairs the SERC, and acts as the information coordinator by maintaining facility and spill reports, distributing grant monies, and providing advice to LEPCs.
- Ohio EPA will be the lead state agency on-scene when the primary threat is to the environment.
- Provides an On-Scene Coordinator (OSC) to assist the IC in response and recovery decision-making and ensure the health and safety of human life, animals, and the environment. The OEPA will act as coordinator between the U.S. EPA OSC and the IC.
- Monitors contamination and pollution, advises on acceptable cleanup operations, and provides guidance on disposal procedures.
- May investigate spills, if necessary.
- May provide reach-back capabilities to help identify unknown substances and WMD.

The EPA should be notified under the following conditions:

- Release of toxic fumes or runoff threatens public health or safety;
- Air, water, or lands of the state could be adversely affected; or

- Public water supply, sewage treatment system, or water disposal site could be adversely affected.

#### **Ohio State Fire Marshal (SFM), Hazmat Bureau**

- Provide trained personnel and dedicated equipment from regional offices to assist the IC in response and recovery decision-making regarding materials with fire/explosive hazards. The Fire Marshal will be the lead State agency on-scene when the primary threat is fire or explosion.
- Provide hazardous materials training through the Ohio Fire Academy and the SFM's Outreach Program.

#### **Ohio State Highway Patrol (OSHP)**

- Assists with traffic and access control on state highways
- Supports local law enforcement operations, as requested
- Provides communication and weather data support as needed.

#### **Public Utilities Commission of Ohio (PUCO)**

- The Hazmat Section can provide on-scene accident assessment of transportation and railroad hazardous materials spills. It can cite the spiller for improper handling, storage, or transport of materials.
- The Consumer Service's Pipeline Safety Section can provide field and technical assistance should a release occur along a pipeline.

#### **State Emergency Response Commission (SERC)**

- Oversees the implementation of ORC 3750.
- A planning body that coordinates the preparedness efforts of the State and LEPCs
- SERC has no response capability.

#### **Federal Agencies**

Requests for Federal assistance shall be requested through the Ohio EMA. If the National Response Center (NRC) was notified by the spiller or IC, the National/Regional Contingency Plan might already be in effect. The National Response Plan, ESF -10, can be implemented to support local operations if required.

## Response

### Initial Notification

A hazardous materials release or spill will most likely be observed and reported by a facility worker, citizen or first responder. Reports of incidents should be made via telephone, radio, or in-person to 9-1-1, a 24 hour/7 day a week operation.

Facility owners/operators or hazardous material transporters are required to make notification within 30 minutes after knowledge of the release or immediately in cases of sheen on navigable waterway, unless the notification is impractical due to the circumstances. Per ORC 3750.06, the spiller is required to notify:

- The local fire department via the 9-1-1 system. The 24-hour non-emergency number for the three Communication Centers in Clermont County and one in Hamilton County are:
  - Clermont County Department of Public Safety Services 513-732-2231
  - Northeast Communication Center 513-677-7000
  - Union Township Communication Center 513-752-1230
  - Hamilton County Communication Center 513-825-2280
- The Ohio EPA spill line at 1-800-282-9378.
- The Clermont County LEPC Emergency Coordinator (the Clermont County EMA Director) or his/her designee. After hours notification should be made to Clermont County Department of Public Safety Services at: 513-732-2231.

The following information will be required in the initial report:

- Date and time of call
- Name and title of caller
- Location of the incident
- Source of spill/leak/release
- Chemical Name and/or placard label name
- Estimated volume of release
- Medium in which the material was released (air, water, soil, other)
- Current situation at the scene/actions already taken
- Current weather conditions
- Assessment of situation (is the spill/vapor cloud moving; which direction; etc.)
- Public Information and warning measures taken
- Known or anticipated health risks
- Facility/Tanker access information for first responders
- Any other precautions recommended
- Name and number of the person to contact for more information

The Dispatcher will assign the resources according to the information obtained from the caller and the agency's standard operating procedure (SOP). The Dispatcher will alert the LEPC emergency response coordinator and the Ohio EPA Spill line if deemed necessary and provide communications during the incident as necessary. The 9-1-1 staff will record the information on the Clermont County LEPC Spill Report Form (Tab C). The completed form should be submitted to the LEPC Emergency Coordinator (clermontema@clermontcountyohio.gov or 2279 Clermont Center Drive, Batavia, Ohio 45103).

## Direction, Control, & Coordination

### Initial Approach

Dispatchers should provide dispatched units the information received from the initial call and the current winds and weather conditions for the area. Responding units will take a route to the incident that will allow them to approach uphill and upwind of the incident. The first on-scene agency will cautiously approach and from a safe distance confirm the hazards involved. Dispatch will be kept informed as to the identification of the hazards or lack thereof. If the first persons at the scene are not the Fire Department, the first unit arriving on-scene will notify the appropriate Fire Department, and advise them of the situation.

Approaching units should:

- Avoid ground liquids
- Stay 1,000 feet away and park facing outward.
- Assess the incident with binoculars for smoke and fire vapor clouds.
- Check for people or animals down or in obvious distress.
- Isolate and deny entry
- Establish a staging area.
- Notify other responding of the potential hazard and the required route of travel.
- Attempt to identify the chemical via container shape, markings and colors, placards, labels, etc. via the Emergency Response Guidebook; “Dangerous” may mean multiple substances or multiple hazards associated with one substance.
- Provide as much information as possible to dispatch.
  - Additional resources are needed;
  - Location of staging area;
  - The best route of travel for responding units
- Notify the appropriate hospital(s), as soon as possible, to give them time to prepare their treatment areas.

### Initial Scene Assessment

An Incident Command Post will be established and a size-up of the situation will be made to determine the potential impact to the public, property and the environment. Command will initially be managed by the senior fire officer or firefighter at the scene or if none, the senior public safety officer at the scene. The on-scene units will then utilize all available tools (such as the Emergency Response Guide, CAMEO, LINK or trained agency personnel such as Hazmat Teams) to complete the initial size-up. Command will determine the appropriate level of response.

**Level I - Potential Emergency Condition:** An incident which can be controlled by the first response agencies and does not require Inci of other than the involved structure or the immediate outdoor area. The incident is confined to a small area and does not pose an immediate threat to life or property.

**Level II - Limited Emergency Condition:** An incident involving a greater hazard or larger area that poses a potential threat to life or property that may require a limited evacuation of the surrounding area.

**Level III - Full Emergency Condition:** An incident involving a severe hazard or a large area, that poses an extreme threat to life and property, and will probably require a large scale evacuation; or an incident requiring the expertise or resources of county, state federal or private agencies and/or organizations.

### **Fixed Facility Responsibilities**

The facility should promptly establish communications with the IC and provide information regarding the type(s), quantity, characteristics and spill movement trends of the hazard.

### **Transporter Responsibilities**

The driver, engineer, or applicable contact should provide information to the IC on the materials being transported e.g. type(s), quantity, characteristics and spill/release trends. It is the Transporter's responsibility to contact OEPA. The IC should also ensure that the OEPA is contacted.

## **On-Scene Direction and Control**

Per ORC 3737.90, the local Fire Chief, or his/her designee should assume the role of Incident Commander (IC) and have overall responsibility for the direction and control of the incident. In the event of a large scale spill/leak/release involving multiple jurisdictions/response agencies, a unified command structure should be established.

An Incident Command/Unified Command Post should be established upwind and at a safe distance from the scene to coordinate on-scene activities and support the deployed emergency response elements.

The IC or Command Staff should develop an incident action plan, taking into account the initial size-up and available information. The courses of action could include:

- Getting the hazardous material into a safe container
- Disposing of the hazardous material
- Neutralizing the hazardous material
- Allowing the hazardous material to dissipate safely

The action plan should identify the method of hazard control and identify the resources available and/or required to complete the task. It may be necessary to select one of several different options or the best action may be no action at all until proper resources are available. The action plan should include:

- Weather assessment
- Population protective actions (evacuation, shelter-in-place, notification of food/water contamination, etc.)
- Responder safety considerations
- Plan for gaining/maintaining control of the situation
- Plan for stabilization of the hazardous material
- Plan for disposal or removal of the hazardous material.

## **Requesting HazMat Resources**

If the spill/leak/release is expected to exceed the capabilities of the local resources, the Incident Commander may request specialized hazmat resources. The local Communication Center will contact the Hamilton County Communication Center to notify the GCHMU Duty Officer. The GCHMU Duty Officer will contact the Incident Commander and determine the level of response.

- Administrative Consultation – Incident Commander requests resource and/or information such as contact with a chemist, clean-up contractor, etc.
- Administrative Response – Duty Officer responds to the scene and provides mitigation and containment

- expertise. Chemists and other specialty personnel may be called upon to respond or provide information.
- Full Team Response – response by Duty Officer, Chemists, Technicians, and apparatus. Entry will be made by technicians.

## Activation of the County Emergency Operation Center

In the event the spill/leak/release exceeds the capabilities (resources, duration, public evacuation, sheltering etc.) of the local jurisdiction, the EOC may be activated to support IC. The EOP Base Plan outlines the activation and operation of the EOC.

## Communications

On-scene radio communications will be provided a Talk-Group by the appropriate Communication Center. The IC will periodically update all agencies present at the command post and the EOC, when activated. Depending on the scope and magnitude, the IC may request Command 400.

- Back-up communications options include:
  - 800 MHz radio cache
  - MARCS
  - Cell phones
  - 2-way radios
  - Decontamination trailer sound systems or other public address systems
  - Megaphones

## Containment and Scene Stabilization

After evaluating the hazard, the IC will determine the most appropriate method for containment. The local fire departments have some resources to contain and stabilize the release. GCHMU has additional equipment and supplies to support containment and stabilization. In the event that the spill/leak/release exceeds the capabilities of the local fire departments and GCHMU, additional resources can be requested through the Intra-State Mutual Aid Compact (IMAC) with the other HazMat teams in the region and the Ohio EMA. The Ohio EPA and U.S. EPA OSC may also provide additional resources to contain/stabilize the scene.

Information on containment of a spill is in the Emergency Response Guidebook. The guidebook lists the potential hazards and the emergency action to take for DOT regulated materials. Also included is information on placard recognition, an isolation/evacuation distances for selected chemicals.

The three basic containment procedures:

- Diking - Diking is used when a leak is emanating from a vehicle. Dikes should be placed around both sides of the vehicle rather than just in the area of the leak. The location of the dikes should be determined after evaluating the hazards to workers. Precautions must be taken to keep contaminants from entering the water system (e.g., covering manholes and sewers with several layers of plastic, sand and/or oil dry.)
- Discharge suppression - Options include creating a water fog or covering the discharge with foam to prevent formation of a toxic cloud. Steps should be taken to plug the leak.
- Allowing the product to continue to burn – This course of action is appropriate if material consists of hydrocarbons or is located in a pipe or cylinder under pressure. The best action may be no action except for monitoring the fire to prevent spreading.

## Responder Safety

The IC should appoint a Safety Officer upon arrival at the scene. The Safety Officer will monitor and assess hazards, identify unsafe situations, and take the necessary steps to reduce the risk of exposure and contamination to first responders. In the event that the Safety Officer deems a situation unsafe, the Safety Officer can override the IC's orders. The Safety Officer will implement the appropriate health and safety procedures to include, but will not be limited to:

- **Site Safety Plan** - The Safety Officer along with IC will develop a site safety plan. This plan should detail the medical surveillance, exclusion zones, PPE use, medical and rehab locations, decontamination and safety corridors.
- **Medical Surveillance** - Emergency Medical Technicians (EMTs) will be assigned to monitor the medical condition of all responders at the scene.
- **Exclusion Zones** - The exclusion zones will be established by the IC to control scene access. The Safety Officer and the hazardous materials team shall assist the IC in determining the zone boundaries. The shape and dimensions of the hazard zones will depend on the magnitude of the problem, wind direction and velocity, surrounding topography and/or adjacent structures, etc.
  - **Hot Zone (High Hazard)** – The hot zone is the immediate danger area surrounding the spill/leak/release. It should only to be entered by trained HazMat personnel or individuals possessing particular knowledge of the problem/situation.

All first response personnel entering the hot zone will wear prescribed levels of protective equipment. An entry and exit checkpoint will be established at the perimeter of the Hot Zone to regulate the flow of personnel and equipment into and out of the zone. An officer designated by the IC will verify that the procedures established to enter and exit are followed. Decontamination procedures will be closely followed to preclude inadvertent exposure.

Any person leaving the hot zone will be inspected for potential exposure and held for observation: If required, those persons will be decontaminated and treated for exposure accordingly.

- **Warm Zone (Potential Hazard)** – The warm zone is the area surrounding the hot zone that presents a minimum hazard to response personnel. It should be restricted to those assigned by the IC. The warm zone contains the decontamination corridor.
- **Cold Zone (No Hazard)** – The cold zone is the area surrounding the warm zone which presents no hazard to emergency services personnel and equipment. It should be reserved for emergency services functions only (e.g. command post, triage, etc.).

## Personal Protective Equipment (PPE)

Responders should wear PPE when atmospheric contamination is known or suspected to exist. PPE is designed to prevent/reduce skin and eye contact as well as inhalation or ingestion hazards.

### Level A Protection

Used when the greatest level of skin, respiratory, and eye protection is required. Level A protection includes:

- Positive pressure, self-contained breathing apparatus;
- Fully encapsulating chemical resistant suit;



- Gloves, inner, chemical resistant;
- Gloves, outer, chemical resistant;
- Boot, chemical resistant, steel toe and shank; (depending on suit boot construction, worn over or under suit boot);
- Two-way radio communications; and
- Optional: underwear, cotton, long-john type; hard hat (under suit); and coveralls (under suit).

### Level B Protection

Selected when the highest level of respiratory protection is necessary but a lesser level of skin protection is needed. This protection is the minimum level recommended on initial site entries until the hazard(s) have been further identified and defined by monitoring/sampling or other reliable methods of analysis. Level B protection includes:

- Positive pressure self-contained breathing apparatus;
- Chemical resistant clothing (coveralls and long sleeved jacket, coveralls, hooded two-piece chemical splash suit, disposable chemical resistant coveralls);
- Gloves, outer, chemical resistant;
- Gloves, inner, chemical resistant;
- Boots, outer, chemical resistant, steel toe and shank;
- Two-way radio communications; and
- Optional: coveralls (under splash suit); boots, outer, chemical resistant; and hard hat

### Level C Protection

Selected when the concentration(s) and type(s) of airborne substance(s) is known and the criteria for using air purifying respirators are met. Periodic monitoring of the air must be performed. Level C protection includes:

- Full-face, air purifying respirator;
- Chemical resistant clothing (one-piece coverall, hooded two-piece chemical splash suit, chemical resistant hood and apron, disposable chemical resistant coveralls);
- Gloves, outer chemical resistant;
- Boots, steel toe and shank, chemical resistant;
- Two-way radio communications; and
- Optional: gloves, inner, chemical resistant; boots, steel toe and shank, chemical resistant; cloth coveralls; (inside chemical protective clothing); hard hat; escape mask.

### Level D Protection

Primarily a work uniform. It should not be worn on any site where respiratory or skin hazards exist.

## Decontamination (Decon)

The decontamination method used at an incident will depend on material identification, assessment of its effects, and its actual removal and disposal. The local fire departments and the GCHMU have decontamination Standard Operating Procedures (SOPs) to decontaminate their personnel, equipment, and the public (if necessary).

### Decon Process

All personnel leaving the hot zone will leave through the decontamination area. Decontamination personnel will monitor and promptly decon all personnel and equipment leaving the hot zone. The area will clearly be identified as the decon area by safety barrier tape, and a sign, and will be located upwind of incident in the safe/warm zone. The area will be established before any personnel enter the incident site.

The County has personnel trained within each fire department to operate a decon line. These personnel will be suited in appropriate PPE while working on the decon line. EMS will be assigned to provide medical observation of the line members.

A formal decon area will be equipped to provide for control of run-off material, storage of contaminated equipment, and medical observation.

### **Decon Resources**

The Southwest Ohio, Southeast Indiana, and Northern Kentucky (SOSINK) region has an 6 mass decontamination units that can be requested. The units can be set up within 30 minutes of arrival with a minimum of 4 to 8 trained fire fighters and decontaminate 200 people per hour. The following agencies host a mass decontamination unit:

#### **Ohio**

- City of Middletown Fire Division, Butler County – Station 81
- Dayton Fire Department, Montgomery County – Station 12
- Paint Creek Joint Fire/EMS District, Highland County – Station 23

#### **Kentucky**

- Campbell County EMA, Campbell County - Campbell County Fire Training Center
- Greater Cincinnati/Northern Kentucky International Airport, Boone County – Station 2
- Kenton County EMA, Kenton County – Training Center, Decon 200

### **Triage, Treatment and Transport**

EMS personnel should take the following precautions:

- Personnel may need to wear appropriate PPE based on the hazard.
- Every attempt should be made to decontaminate all patients prior to treatment and transport. The amount of decontamination done in the field is generally not enough to consider the patient totally decontaminated.
- Transport units shall always notify the hospital prior to arrival they are transporting a contaminated patient to their facility.
- Air transport should not be considered for transportation of a contaminated patient.
- EMS units may use body bags to transport victims or isolate the back of the vehicle.
- EMS units may need plastic sheets, tape, disposable sheets and isolation bags to prepare for transport.
- EMS units may want to remove supplies and then protect the inside of the vehicle by: 1) sealing cabinets with tape; 2) drape the inside of the vehicle with plastic; 3) cover advanced equipment with clear plastic; and 4) drape the cot with several layers of disposable sheeting.
- Consider activation of the Hospital Disaster Net. This is a coordination system for patient transportation between participating hospitals throughout the region.

### **Population Protection**

As the incident level is determined, the IC may implement population protective actions based on the hazards and the weather conditions. Depending upon the seriousness of the incident, protective actions could include recommending: shelter-in-place, evacuation, and/or notification of contaminated food or water supplies.

In some cases, advising people to stay indoors and to attempt to reduce the flow of air into a structure might be the most effective protective option. This strategy will be used by emergency responders when it has been recognized that people cannot be evacuated from an area prior to the arrival of a toxic cloud.

Evacuation can be effective in protecting the public if it can be accomplished prior to the arrival of the toxic cloud at a particular location. The effectiveness of evacuation is dependent upon the time required to evacuate an area compared to the time available before the cloud arrives.

If the local fire department or the HazMat team detects an unacceptable level of contaminants in the air or if they believe that there may soon be an unacceptable level, the IC may make an evacuation or shelter-in-place order.

The IC should:

- Define the area requiring shelter-in-place/evacuation;
- Determine the degree of immediacy (is the action precautionary or does it require immediate action);
- Define areas of priority based on wind direction and speed, toxicity of the substance, exposure potential, etc.;
- Advise law enforcement of the area to be evacuated/shelter-in-place;
- Initiate alert and notification of organizations having an evacuation role; and
- Assist law enforcement in warning and supervising the withdrawal of people.

Law Enforcement should:

- Identify the outer boundary of the evacuation zone (selecting natural boundaries such as rivers, freeways, and railroad tracks or easily recognizable major streets as the outer perimeter);
- Identify assembly point locations;
- Identify the location of road blocks based on general traffic flow;
- Identify the number of personnel needed for evacuation (consider mutual aid requests);
- Identify the location of staging areas for support personnel that will be involved in the evacuation;
- Develop warning message content; and
- Provide security to the evacuated area.

The American Red Cross should assist with setting up reception centers or shelters depending on the expected duration of the evacuation order. The Mass Care Annex (#6) provides additional details on the American Red Cross responsibilities.

## **Emergency Public Information & Warning**

The local fire department and/or IC will be responsible for coordinating the public alert and warning on-scene. The IC should coordinate with local law enforcement to canvas the area and identify elderly and individuals with functional and access needs that may need assistance with evacuating/sheltering-in-place.

The IC may also coordinate with the local Communication Center, Clermont County EMA and the Clermont County Office of Public Information to disseminate alert and warning messages through:

- Outdoor Warning Sirens;
- Emergency Alert System (EAS);
- Integrated Public Alert and Warning System (IPAWS); and
- Media Releases.

Affected individuals will be warned of the potential hazard and the recommended safety precautions. If an evacuation order is recommended, specific information will be provided to the public including:

- Area to be evacuated;
- Evacuation routes;
- Assembly point locations;
- Shelter locations (if applicable);
- Supplies that the public should take with them;
- Instructions for pets; and
- Instructions for a safe return after the incident.

The public notice should encourage the evacuating communities to use their own vehicles (if possible) and to assist neighbors that do not have their own private transportation. The IC should also consider other forms of public transportation such as: emergency response vehicles, cruisers, vans, CTC buses, school buses, etc. to assist those individuals who rely on public transit.

In some situations, it may be safer if the public shelters-in-place until the hazard has passed or dissipated. The shelter-in-place order may be the most viable option when:

- The nature and concentration of the chemical released is not life threatening, but may be quite noxious;
- The size of the release and given atmospheric conditions indicate rapid dispersal of the chemical; or
- The toxic plume approaches rapidly and a timely evacuation cannot be carried out.

If a shelter-in-place order is recommended, the public will be advised to:

- Go indoors (home, school, office);
- Shut off all outside air sources (doors, windows, fans, air conditioners, furnaces);
- Tune into the radio and/or local television stations and follow the instructions.

The public will be notified when it is safe to return to normal activities. Additional instructions may be provided such as health advisories, instructions on how to air out buildings, etc.

## Recovery

The clean-up and disposal process will be coordinated by the Incident Commander in conjunction with the Ohio EPA, the local health department, the Water Resources (if in a waterway), and the EHS/HS facility or transporter personnel.

## Containment

Containment is a responsibility of the owner, spiller or shipper. The IC will work with the spiller in providing containment for the incident. For minor spills or releases first responders should use the appropriate technique for the situation. Such techniques may include, but are not limited to:

- Flushing the area with water; or
- Gathering the contaminant into U.S. DOT permitted drums for proper disposal.

As the incident progresses, the IC will assess the need for removing, increasing or altering existing containment techniques. If the situation exceeds the local capabilities, private contractors may be called in at the expense of the spiller. Techniques may include:

- Hydraulic and mechanical dredging
- Excavating
- Skimming

- Pumping
- Dispersion/dilution
- Vacuuming

**Note:** For billing purposes, the party responsible for the spill or release should call the private clean-up companies.

### **Restoration: Cleanup and Re-entry**

The IC will coordinate with the OEPA and the spiller to promptly take steps to secure a cleanup and disposal contractor. The Ohio EPA will oversee the spiller's removal of the contaminants. If the spiller fails to do so in a timely fashion, or if the spiller cannot be determined, the OEPA may arrange for cleanup and disposal. Costs will be billed to the spiller if known. Neither the County nor the local jurisdictions has the capability for disposal of hazardous materials.

Following the removal of the hazardous materials, the affected area must be returned to its original condition when feasible. If residual contamination remains and it is determined that additional removal is not feasible, a site closure plan should be written for review by applicable local, state, and federal agencies.

Once the site has been deemed clear, the IC in conjunction with the Ohio EPA OSC and the Public Health will determine the return criteria and issue a statement to the public authorizing the return of evacuees or the lifting of the shelter-in-place order. The information may be disseminated through the Incident PIO, the jurisdiction/department PIO, or the County PIO.

### **Documentation**

The IC should maintain all records, including incident logs and any accompanying documents, for historical reference and possible litigation. The IC should prepare a report that summarizes the incident including cause of incident, incident critique, damage assessment, expenditures, and conclusions. The LEPC Emergency Coordinator will document actions taken at the EOC, if activated.

The spiller is responsible for documentation of a release. Per ORC 3750.06(D), the spiller should prepare and submit a report to the LEPC and SERC. The report should be submitted within thirty (30) days of when the release occurs. The report should contain the following:

- Actions taken to respond to and contain the release;
- Any known or anticipated acute or chronic health risks associated with the release;
- Advice regarding medical attention necessary for exposed individuals as appropriate;
- A summary of all actions taken by the owner or operator to prevent the recurrence of such a release.

The LEPC's Information Coordinator will receive and maintain copies of all completed reports for historical and legal needs. The reports will be used in critiques, cost recovery, and plan reviews/revisions. The reports will be reviewed by the LEPC membership at the next regularly scheduled meeting.

Following a hazardous materials incident, the local fire departments and GCHMU may conduct an after-action meeting. The after-action will allow the response agencies to discuss the incident, each group's response, and any recommended changes in plans and procedures. Each agency will review and update their SOPs based on recommendations made during the after action meeting. Likewise, any deficiencies in the Clermont County EOP – HazMat Annex will be corrected by the LEPC or EMA Staff. Any revisions made will be documented and submitted to the LEPC for adoption.

## **Investigative Follow-Up**

The IC will work with the Ohio EPA and local law enforcement to determine the spiller's liability. This information will be relayed to the LEPC and the applicable legal counsel for the area impacted. The LEPC should then in consultation with the legal counsel determine whether or not to take civil/ criminal action under the law.

## **Cost Recovery**

The Ohio Revised Code, Section 3745.13 states that any person responsible for causing or allowing an unauthorized spill, release, or discharge of a material into or upon the environment is liable for all costs incurred by responding organizations. It is at the discretion of the responding department's chief whether an invoice will be submitted for reimbursable expenses for his/her department or agency.

Each responding department must maintain records to verify all expenditures. Documentation includes:

- Wages including overtime;
- Containment materials and supplies;
- Clean-up materials expended;
- Contractual materials (e.g. lights, cranes);
- Food;
- Transportation costs (functional/access needs evacuation); and
- Communication costs.

A detailed invoice should be submitted to the spiller's insurance company within 30 business days.

If the GCHMU responded, local jurisdictions may opt to submit their invoices to GCHMU for submission to the spiller's insurance. A detailed breakdown of equipment used and personnel on-scene must be provided to GCHMU within the next working day following the incident. If the local jurisdiction is unable to meet this deadline, they can submit directly to the spiller's insurance provider.

ORC 3745.13 provides that in the event a settlement cannot be reached with the responsible parties regarding cost recovery, the response agency/ political jurisdiction and its legal counsel are authorized to negotiate a settlement or bring civil suit against the responsible party.

## **Annex Development and Maintenance**

The Clermont County EMA and LEPC have the responsibility to work with local jurisdictions, non-governmental organizations, and the state to update, revise and maintain the EOP – Hazardous Materials Annex. ORC 3750.04(C) requires the LEPC to annually review and exercise the Hazardous Materials Annex.

## **Coordination and Approval**

All response agencies are responsible for developing or updating internal procedures that will assure a level of operational readiness. The LEPC will meet as a group to complete the annual plan review. The plan shall also be reviewed following each exercise or actual incident.

The LEPC's Emergency Coordinator is responsible for the overall development and maintenance of this Annex. The Emergency Coordinator should solicit comments annually from plan holders.

As changes are made, the updated pages will be provided to all individuals and agencies listed as holding copies of the EOP. It is the responsibility of the copy holder to post such changes and then note the change on the Record of Change sheet.

## Exercise Requirements

Ohio Administrative Code (OAC) Section 3750-20-78 requires that the LEPC develop a four-year exercise cycle to evaluate chemical preparedness. During the four year cycle the LEPC must:

- Conduct a minimum of one exercise per State Fiscal Year (SFY) year (July 1 – June 30).
- Test the activation and operation of the Emergency Operation Center (EOC) at least once;
- Conduct a minimum of one full-scale exercise;
- Evaluate each exercise objective as outlined in the Ohio Hazardous Materials Exercise and Evaluation Manual (OHM-EEM); and
- Include an EHS/HS Facility or Transporter;

There are three types of exercises that can be conducted as per OAC Section 3750-20-74.

- **Table-Top Exercise** – Table Top Exercises (TTXs) are intended to stimulate discussion of various issues regarding a hypothetical scenario. They can be used to assess plans, policies, and procedures or to assess types of systems needed to guide the prevention of, response to, or recovery from a defined incident. To meet the SERC requirement a TTX must test three (3) or more objectives with at least one (1) being a core objective as defined by OHM-EEM.
- **Functional Exercise** – A functional exercise (FE) is a single or multi-agency activity designed to evaluate capabilities and multiple functions using a simulated response. A FE is typically used to: evaluate the management of the EOC and command posts; and assess the adequacy of response plans and resources. To meet the SERC requirement a FE must test four (4) or more objectives with at least two (2) being core objectives as defined by OHM-EEM.
- **Full-Scale Exercise** - A Full Scale Exercise (FSE) is a multi-agency, multi-jurisdictional activity involving actual deployment of resources in a coordinated response as if a real incident had occurred. A FSE tests many components of one or more capabilities within emergency response and recovery, and is typically used to assess plans and procedures under crisis conditions, and assess coordinated response under crisis conditions. To meet the SERC requirements FSE must test eight (8) or more objectives with at least five (5) being core objectives as defined by OHM-EEM.

The exercise will be evaluated by persons selected by the LEPC. The SERC facilitator will, with the assistance of the exercise design team, train the evaluators on their assigned roles and what areas they will evaluate. The evaluators will utilize the SERC provided evaluation forms. A critique of the exercise will follow each exercise. Participants, controllers and evaluators will discuss the results and lessons learned from the exercise. As required by law, after a FSE, the LEPC will announce and hold a public critique of the exercise (at either the next regular LEPC meeting or at a specially held LEPC exercise meeting).

The LEPC will use the Evaluators', Facilitators' and the critique comments to see if activities are effective in practice or if there are more efficient ways of responding to an incident. The annex will be updated accordingly. During the next exercise, changes will be tested to see that the deficiencies were corrected.

In the event of a real hazardous materials response, the LEPC may apply for credit towards the exercise requirement. The LEPC must submit an exercise notice to OEMA along with a summary of the incident within 30 days of the actual incident. The summary should include:

- Event Synopsis (Jurisdictions involved, chemical released, etc.);

- Type of exercise that the event would count towards; and
- The objectives the LEPC wants to claim for exercise credit.

No more than 2 real events may be counted toward the 4-year exercise cycle requirements.

## **Information Requests**

Per ORC 3750.07 and .08, The LEPC Information Coordinator is responsible for maintaining spill reports and the annex. The annex is available upon request and during normal operating hours at 2279 Clermont Center Drive, Batavia, Ohio 45103. Trade secret and hazardous material locations are not disclosed in accordance with the law. Any request to review information must be made in writing to the Information Coordinator. If information is not on file with the County, the Information Coordinator will contact the facility for the required information to fulfill the request.

The Information Coordinator will maintain a record of the types and frequencies of information requests. The number and type of information requests is shared at all regularly scheduled LEPC Meetings.

## **Authorities and References**

The following is a list of applicable Federal, State and Local Laws that apply to the development of this annex.

### **State Laws**

- Ohio Revised Code (ORC) Chapter 3750: Emergency Planning
- ORC Chapter 5502: Effects of SARA Title III on Emergency Management
- ORC Chapter 3745.13: Recovery of Costs from Persons Causing Environmental Emergencies
- ORC Chapter 3737.80: Hazardous Materials Emergencies
- ORC Chapter 2305.232: Civil Immunity for Persons Assisting in Cleanup of Hazardous Material
- Ohio Administrative Code (OAC) 3750: Defines the rules adopted by the SERC under ORC Chapter 3750
- Ohio Fire Code 1301:7-1-03 Section F-102.8 Authority at Fires and Emergencies
- Ohio Attorney General (OAG) Opinion, No. 91-014: Liability of SERC /LEPC members under ORC 3750.
- ORC 6109: Public Water System Primary Contaminant Control.

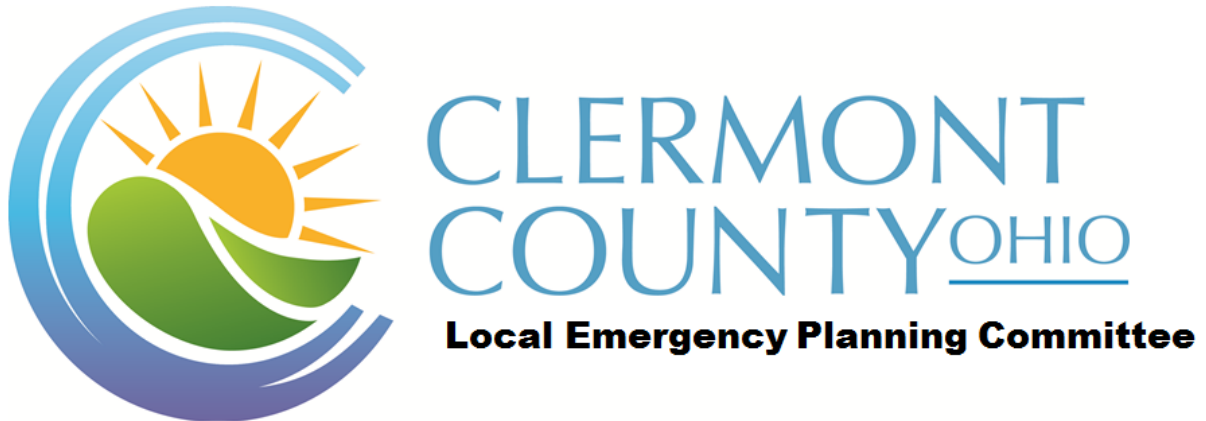
### **Federal Laws**

- Superfund Amendments and Reauthorization Act (SARA), Title III: Emergency Planning and Community Right-To-Know Act of 1986 (EPCRA) (Public Law 99-499). This sets the framework for EHS planning in the US.
- Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA or Superfund) (Public Law 96-510). This provides Federal funds for responses to releases of Hazardous Substances and requires notification to the National Response Center (NRC) of accidental releases.
- Occupational Safety and Health Administration (OSHA), Standard 29 CFR 1910.120(q): Emergency Response. This section of the Hazardous Waste Operations and Emergency Response Standard describes the training and planning required of those who will take part in an emergency response to a release of hazardous materials. It also prescribes the use of an Incident Command System during a response.
- SARA, Title I; Section 126: Worker Protection Standards. This directed OSHA to develop training standards for persons responding to hazardous emergencies who might be exposed to toxic substances. OSHA established the HAZWOPER standards. These standards were adopted by the USEPA for non-OSHA states



such as Ohio in EPA'S 40 CRF Part 31.

- Oil Spill Pollution Act of 1990 (OPA 90) (Public Law 101-380). This defines that Facilities with Hazardous Substances or Oil under the Clean Water Act must have a Facility plan for accidental releases.
- Clean Water Act of 1977 (CWA) (Public Law 95-217). This amends the Federal Water Pollution Control Act regulating discharges of toxic pollutants into waterways.
- Hazardous Materials Transportation Uniform Safety Act of 1992 (HMTUSA) (Public Law 101-615). This amends the Hazardous Materials Transportation Act of 1977, and it establishes uniform licensing of hazardous materials transporters. It also established a planning and training grant fund to supplement LEPC and Fire Department programs.
- Resource Conservation and Recovery Act of 1976 (RCRA) (Public Law 94-580). This provides for the safe treatment and disposal of hazardous wastes from cradle to grave, and defines that underground storage tank owners are financially responsible for cleaning up leaks.
- Toxic Substances Control Act of 1976 (TSCA) (Public Law 94-469). It defines the testing and screening of chemicals produced/imported into the US.
- Title XIV of Public Law 104-201, the National Defense Authorization Act (1997). Also known as the Nunn-Lugar-Domenici Bill, directed the Federal Government to improve the capabilities of state and local agencies to respond to incidents involving WMD. This program is administered by the National Domestic Preparedness Office (NDPO), an interagency including FEMA, FBI, Department of Energy, EPA, Department of Justice/Office of State and Local Domestic Preparedness Support, Department of Health & Human Services and the National Guard Bureau.



# **2025 Clermont County Hazardous Materials Annex TABS A – L**

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