



INTEGRATED CONTINGENCY PLAN ("ONE PLAN") GUIDANCE

In June, 1996, the National Response Team (NRT) published the Integrated Contingency Plan (ICP or One Plan) Guidance. This guidance provides a way for facility owners and operators to consolidate into one functional plan, the multiple oil and hazardous substances emergency response plans they may have prepared to comply with various federal regulations. The guidance followed recommendations of a Presidential Review of federal release prevention, mitigation, and response authorities. Among the findings of this Presidential Review was that although the extant federal regulatory system achieved the statutory goals of protecting public health and safety and the environment, the system nevertheless was complex, confusing, and costly. The ICP Guidance resulted from recommendations in a 1993 Report to Congress: *A Review of Federal Authorities for Hazardous Materials Accident Safety*. In developing this guidance, the NRT received ideas and comments from representatives from state and local agencies, industry, and environmental groups.

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 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 of effort and unnecessary paperwork burdens, 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.

QUESTIONS?

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 below)

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 web site at
<http://www.epa.gov/swcercepp/pub/one-plan.html>.