

SCENARIO # 19

EMERGENCY PLANNING FOR A PROPANE BULK PLANT



FIGURE 8-62

You are the manager of a large propane bulk plant. You receive a call from the Sheriff's Department at 2:15 AM. There is a fire at your facility!

The Sheriff's Department Dispatcher informs you that one of your bulk stationary tanks is burning and the fire department is on-scene and is beginning operations to cool the tank. You are informed the Pressure Relief Valve (PRV) is operating. The fire department has ordered an evacuation of the area. The Fire Chief has requested that you report to the plant and meet him at the Incident Command Post (ICP).

As you drive towards the facility, your mind races with questions. Which tank are they talking about? How big is the fire? What has been done already? How many people have been evacuated? Was an evacuation really necessary? Who else has been notified? Have my operations people been called? These and a hundred more questions race through your mind but you have very few answers. You have only bits and pieces of information. About three miles from the plant your heart sinks when you see the bright orange glow of fire against the night sky.

PLANNING FOR YOUR WORST DAY

Imagine you are faced with this emergency. Impossible you say? Impossible yes, Impossible No! Firefighters often cite a fire involving a large propane tank at a bulk plant as one of the most dynamic scenarios that they could encounter. Most firefighters will never respond to an event like the one described in this scenario because of effective safety programs. The limited possibility of a major fire at your plant is not enough of a reason not to prepare for a major emergency. An important question we must ask ourselves as propane marketers and dealers is are we prepared for the different types of emergencies that could occur? We cannot be sure

how we will respond when faced with a real emergency, but if we have a plan before the event, we will be better prepared to solve the problem.

Unfortunately, some propane facilities have not planned well for a major fire and rely totally on the local fire department to deal with potential fires at the plant. Most propane dealers support their local fire departments and rely on them for handling emergencies, but a well-trained and equipped fire department is not enough. An Emergency Response Plan is needed!

WHERE DO WE START?

On June 5 1996, the National Response Team (NRT) issued a good planning aid for industrial facilities that want to plan for emergencies. This document is called the Integrated Contingency Planning Guidelines (ICP) and is commonly referred to in industry as the "One Plan". The ICP allows facilities to create new plans or revise their existing emergency plans to address the many different regulatory requirements of various federal agencies in one single plan. The National Response Team (NRT) consists of the primary federal agencies that have some type of emergency planning requirements for industry. These agencies include the Department of Homeland Security, U.S. Department of Transportation, Department of Interior, Environmental Protection Agency, and the Occupational Safety and Health Administration.

The unique characteristic about the Integrated Contingency Planning Guidelines is that they are simply guidelines and recommendations and not law. They are designed to help organizations write an effective Emergency Response Plan. If the ICP guidelines are followed in preparing your plan, the document will help you deal with any type of emergency including a propane release, fire, tornado, hurricane, or any contingency that may require emergency actions.

The concept of having "One Plan" instead of several different plans for various types of emergencies help minimize duplication and makes emergency planning cost effective. It also helps keeping the plan up to date easier.

OVERVIEW OF THE ICP GUIDELINES

The Integrated Contingency Plan is divided into three primary sections. These include:

- 1) Introduction,
- 2) Core Plan and,
- 3) Annexes.

INTRODUCTION SECTION

This section covers the preliminary details that are found in most plans such as the scope of the document, key names, addresses of contacts for an emergency, a description of processes, and the general facility hazards information. A sample outline for this section includes:

- 1) Table of Contents
- 2) Purpose and Scope of the Plan
- 3) Current Revision Dates
- 4) General Facility Identification Information
- 5) Facility Name

- 6) Owner / Operator
- 7) Physical Address of the Facility
- 8) Mailing Address
- 9) Other Identifying Information
- 10) Description of Facility Processes and Hazards

CORE PLAN SECTION

This section is the heart of the plan. It describes how to alert and notify, those that will do what during the emergency, who responds, how the problem will be controlled, and how to terminate the incident. It is organized into four subsections. These include:

- 1) Introduction,
- 2) Core Plan and,
- 3) Annexes.
 - a) Discovery,
 - b) Initial Response,
 - c) Sustaining Actions and,
 - d) Termination and Follow Up Actions.

DISCOVERY

This section describes the initial actions the person discovering an emergency would take to recognize the problem and sound the alarm. Topics should include recognition and basic assessment, quick action steps to control the emergency, and the initial notification procedure. Checklists can be developed for the telephone operator, security, plant personnel and plant supervisors.

INITIAL RESPONSE

This section describes procedures for notifying the appropriate personnel of the emergency. This should address internal as well as external responders. The facility Incident Management System should be described and include a table of organization. It is important that employees understand who is in charge during an emergency.

This section should also include a set of procedures for preliminary assessment. In addition to the preliminary assessment, there must be a method of establishing response objectives.

The plan should describe what type of resources will be needed to handle an emergency and where they can be obtained. This could include your local fire department, industrial mutual aid organizations or environmental response contractors.

This section should also describe a 24-hour contact point with the names of the person(s) and alternates who will be called to the scene to represent your company. It should also include information for the person who makes the call and what critical information needs to be delivered. Usually in the form of a checklist.

SUSTAINED ACTIONS

Sustained actions are those actions that would allow a transition between the initial response and longer sustained actions to accomplish mitigation. Sustained actions

would also address recovery actions that should progress under an Incident Management System. Section 9 addresses many of the issues that would be considered as sustained actions such as flaring the tank, repairing or righting an overturned transport vehicle and any necessary clean up operations.

TERMINATION AND FOLLOW-UP ACTIONS

This section should briefly address methods that will aid people in charge of coordinating a successful conclusion of the incident. Follow-up activities may need to be addressed such as accident investigation, critique, reports and revisions of the existing plans. This information does not have to be developed in a vacuum. Facilities can use information already in the annexes that will be discussed in the next section.

ANNEX SECTION

This is the portion of the plan where the detail is placed. Many plans get bogged down in too much detail in the main body of the plan. Maps, phone lists, prevention documents, training records, and a matrix that shows how the plan meets various regulatory requirements from federal and state agencies, go in this section. Remember this is the “One Plan”.

The basic annexes are:

Annex 1—Facility and Locality Information

This annex includes the details of how to drive to the facility and detailed maps of the plant along with descriptions of the operation and layout of the plant in relationship to the community. It also includes the telephone numbers of the members of the community who need to be notified. This annex may also include detailed descriptions of vulnerable resources in the community and populations or organizations that may be at risk, such as schools, hospitals, transportation routes and another vital area or population that may be at risk in the event of an emergency at the facility. Information obtained from product release prevention and incident response reviews can be useful in preparing this annex, see Scan Sheet 6-A (page 120) for more information on a fire safety analysis.

Annex 2—Notification

This annex includes detailed lists and contact information of individuals that must be notified of an emergency. This includes external organizations in the community and the appropriate federal representatives. The plan should describe who to call, when to call, and what information needs to be supplied. Information provided in the Core Plan does not need to be duplicated here.

Annex 3—Response Management System

In any emergency there needs to be an Incident Management System. The facility must provide the details of the organizational system in place to manage an emergency. This should include organization charts, job descriptions, and information charts. In addition, there must be a designated commander or coordinator. Section 7 provides an overview of the Incident Management System as it may apply to a propane incident.

Annex 4—Incident Documentation

Every incident needs to be documented. This annex includes the procedures, forms and details of what must be done after every incident. This should include procedures for conducting an investigation and coordination with outside agencies such as the fire marshal, state police and other local, state and federal investigators.

Annex 5—Training and Exercise / Drills

Emergency response training and exercises should be documented in this section. This should include the description of the training, logs of who has been trained and when they were trained, and past, present and future schedules of training.

The details of the facility exercise program should be included in this section. Dates of the exercises and details of recommendations for changes and improvements should be detailed.

Annex 6—Critique and Review

This annex explains the procedures for conducting an incident or training exercise critique. The annex should include a description of how to implement the lessons learned from the critique and any modifications that are required. In addition to the list of changes, the past changes and modifications should be documented along with the dates of the changes.

Annex 7—Prevention

In order to be successful in emergency planning, prevention must be addressed. This annex allows facilities to describe their fire and accident prevention programs, inspection intervals and procedures, testing and inspection of detection devices, emergency shut offs, and excess flow valves.

Annex 8—Regulatory Compliance and Cross-Reference Matrices

This last annex has two parts. Part One includes the signatory page and certifications while Part two addresses the information necessary for reviewers to determine compliance with specific regulatory requirements. This annex can contain cross-references for locating the specific item for other planning requirements. This plan allows the facility to meet the needs of several plans. For facilities interested in compliance with other agencies, the ICP guideline contains a series of matrices that can be used when emergency planners to the outline described in this scenario.

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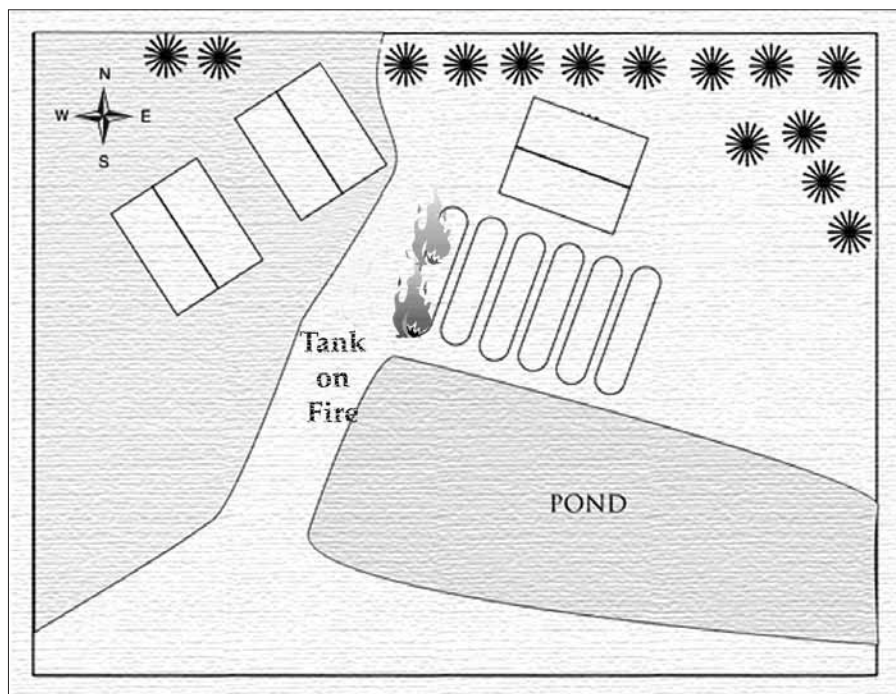


FIGURE 8-63