

HAZARDOUS MATERIALS PROGRAM ENVIRONMENTAL FACT SHEET

Emergency Preparedness and Prevention Requirements for Large Quantity Generators (LQGs)

It is critical that all hazardous waste generators work to prepare for and prevent emergencies that could occur from their activities, as hazardous waste poses a threat to human health and the environment. All hazardous waste generators are required to conduct hazardous waste management operations in a manner that minimizes the possibility of fire, explosion, or a release. Beyond this, small quantity generators (SQGs) and large quantity generators (LQGs) are required to take specific steps established in the [Vermont Hazardous Waste Management Regulations](#) (VHWMR). This fact sheet provides an overview of the regulatory requirements that apply to LQGs; SQGs should refer to the [Emergency Preparedness and Prevention Requirements for SQGs](#) fact sheet. Please note that this fact sheet is a summary of key requirements; refer to the VHWMR for specific requirements and direct any questions to the Hazardous Waste Section using the contact information at the end of this fact sheet.

What is required in the event of a release of hazardous material?

Anyone that handles hazardous materials, including hazardous waste, should be aware of the Emergency and Corrective Actions requirements established in § 7-105 of the VHWMR. A hazardous material spill of two gallons or more, or a spill that is less than two gallons but poses an actual threat to human health or the environment (e.g., gallon of gasoline spilled to a wetland), must be reported immediately (as the response allows) to the Department of Environmental Conservation (DEC) Spill Team by calling either:

- **1-800-641-5005 (24-hour Hazardous Materials Spills Hotline); or**
- **802-828-1138 (DEC Spill Team during regular business hours (M-F 7:45 am - 4:30 pm EST))**

If there is any question as to whether a spill must be reported, DEC strongly encourages calling to report. For more information on the requirements for responding to a release, please refer to the [Hazardous Material Spill Response Fact Sheet](#).

What emergency preparedness and prevention requirements apply to LQGs?

The emergency preparedness and prevention requirements that apply to LQGs include the following:

Required Equipment

The following items and systems must be in place where hazardous waste is generated, accumulated, or stored, and it must be tested and maintained:

- Equipment: portable fire extinguishers, fire control, spill control, and decontamination.
- Internal communications or alarm system capable of providing immediate emergency instruction to facility personnel.
- Device (e.g., cell phone or two-way radio) immediately available at the scene of operations,

capable of summoning emergency assistance from local police or fire departments, or state or local emergency response teams.

- Water at adequate volume and pressure to supply water hose streams or foam producing equipment, or automatic sprinklers.

Access to Communications or Alarm Systems

All personnel involved in hazardous waste handling operations **must have immediate access to an internal alarm (e.g., fire alarm) or emergency communication device**. For smaller facilities, audible voice instructions are adequate to meet this requirement. If there is only one employee on the premises during operations, they must have immediate access to a device (e.g., cell phone) capable of summoning external assistance.

Aisle Space

In all areas where hazardous waste is generated, accumulated, or stored, LQGs must **maintain aisle space of at least 24 inches** to allow access for personnel and emergency equipment during an emergency.

Arrangements with Local Authorities

LQGs must provide emergency responders (i.e., police and fire departments, emergency response contractors, equipment suppliers, and local hospitals) with information about the layout of their facility, the hazardous wastes that may be onsite, and other details relevant to possible emergencies (see below). In the VHWMR, this is referred to as “making arrangements” with local authorities. This is typically achieved by sending written information about the facility via email or mail or inviting emergency responders to conduct a walkthrough of the facility. If conducting a walkthrough, facilities must retain a record in their files noting the following information: date of event, emergency personnel present, and summary of the information provided.

The following are required when making emergency arrangements, and must be specific to the LQG facility, wastes, and hazards:

- If making arrangements in writing, include a description of the facility layout; types and quantities of hazardous waste, their properties, and hazards; places personnel work; entrances to roads; evacuation routes; and injuries/illnesses that could result from an emergency.
- Document arrangements with the local fire department and any other organization necessary to respond to an emergency; to comply with this requirement, save any written communication between facility and emergency responders in facility files as this information will be requested during a compliance inspection.
- When attempting to make arrangements with the local fire department, determine the potential need for the local police department, emergency contractors, equipment suppliers, and local hospitals. For example, if a facility only handles oil-contaminated solids, they are unlikely to require police or hospitals for a waste-related emergency.
- Documentation must be included in the operating record that either confirms such arrangements actively exist or confirms that attempts to make such arrangements were made.

Note: Arrangements may be made with the Local Emergency Planning Commission (LEPC), however, generators should be aware that *Tier II reporting (alone) does not satisfy VHWMR requirements*. Please direct questions about Tier II to the following mailing or email address:

Statewide LEPC

45 State Dr.

Waterbury, VT 05671

DPS.StatewideLEPC@vermont.gov

Contingency Plan

LQGs are required to **develop a written contingency plan that lists the specific steps the facility will take in the event of an emergency** (e.g., fire, explosion, or discharge which could threaten human health or the environment). LQGs must **maintain** a current copy of the plan at the facility, and they must submit all revisions of the original plan to local authorities (see previous section). This plan **must contain facility-specific information** and be updated in specific situations (see below).

Note: If a Spill Prevention Control and Countermeasures (SPCC) Plan is in place, or some other contingency plan, the LQG only needs to amend that plan to incorporate the hazardous waste provisions of the VHWMR; a separate hazardous waste contingency plan is not required, but facility may choose to develop one at their discretion

The contingency plan must contain:

- Description of actions facility personnel must take in response to emergencies.
- Arrangements with local authorities (see previous section).
- Names and emergency phone numbers of emergency coordinator(s). If more than one is listed, one must be named as primary, and others must be listed in the order they will assume responsibility. If an emergency coordinator is continuously on duty (24 hours per day, every day of the year) the plan may list the position and an emergency phone number.
- List of emergency equipment at the facility (e.g., fire extinguishing, spill control, communications and alarms, decontamination), and the location and description of each item.
- Evacuation plan for facility personnel that describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

The contingency plan must be updated whenever a significant change occurs related to emergency preparedness (e.g., the facility layout, emergency coordinator(s), or emergency equipment changes) and/or the plan fails in an emergency.

Quick Reference Guide

This additional requirement was implemented in 2022 when the VHWMR were revised. A Quick Reference Guide summarizes the details contained in the contingency plan and provides vital information for safely responding to emergencies at a facility where hazardous waste is likely to be present. **LQGs are required to submit a Quick Reference Guide to local emergency responders**, or the LEPC, as appropriate (see note in earlier section regarding LEPC), and must update it whenever the contingency plan is amended. Updated information must be submitted to local emergency responders.

If your facility has amended its contingency plan since February 1, 2022, you must have a Quick Reference Guide on file. If your facility has not made revisions or amendments to the contingency plan since that date, then you must develop and distribute a Quick Reference Guide at the time of the next contingency plan revision.

The Quick Reference Guide must include:

- The types/names of hazardous wastes in layman's terms and the hazard(s) associated with each hazardous waste present at any one time.
- Estimated total amount of each hazardous waste that may be present at any one time.
- Identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff.
- Map of the facility showing where hazardous wastes are generated, accumulated, and treated, and routes for accessing these wastes.
- Street map of the facility in relation to surrounding businesses, schools, and residential areas to understand how to access the facility and also evacuate citizens and workers.
- Locations of water supply (e.g., fire hydrant and its flow rate).
- Identification of on-site notification systems (e.g., fire alarm, smoke alarms).
- Name of the emergency coordinator(s) and 7-day /24-hour emergency phone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency phone number for the emergency coordinator.

Emergency Coordinator

LQGs must **designate at all times at least one employee either on the premises or on call with the responsibility for coordinating all emergency response measures.** The emergency coordinator must have the authority to commit the resources needed to carry out the contingency plan and **must be thoroughly familiar with the following:**

- all aspects of the generator's contingency plan
- all operations and activities at the facility
- the location and characteristics of hazardous waste handled
- the location of all records within the facility
- the facility's layout.

Training Requirements

An effective training program increases safety and is intended to reduce the likelihood of a release or emergency arising from improper handling of hazardous waste. **The training program at an LQG facility must meet the following:**

- Directed by a person trained in hazardous waste management procedures and must include hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. This person may be an employee, or an external consultant hired by the LQG.
- Designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, equipment, and systems, including: waste handling procedures; procedures for using, inspecting, repairing, and replacing facility

emergency and monitoring equipment; key parameters for automatic waste feed cutoff systems; communications or alarm systems; response to fires or explosions; response to groundwater contamination incidents; and shutdown of operations. The individual(s) assigned emergency coordinator responsibilities must be trained to effectively perform their emergency coordinator duties.

LQG facility **personnel must meet the following as part of the training program:**

- Within six months of hire or assignment to a facility or new position, whichever is later, successfully complete a program of classroom instruction, online training, or on-the-job training that teaches them to perform their duties in compliance with the VHWMR.
- Take part in a review of the initial required training program at least once per calendar year.
- Personnel must not work in unsupervised positions until they have completed the training requirements.

LQGs must **maintain the following documents** at the facility and meet the following requirements:

- Job title and name of the employee filling each job for each position at the facility related to hazardous waste management.
- Written job description for each position which includes the requisite skill, education, or other qualifications and duties of facility personnel assigned to each position.
- Written description of the type and amount of introductory and continuing training that will be given to each person filling a position.
- Records that document that the required training or job experience has been given to and completed by facility personnel (e.g., training attendance logs, certificates of completion).
- Maintain training records on current personnel until closure of the facility and for former employees for at least three years from their final date of employment.

Note: During a compliance evaluation inspection, DEC inspectors will ask to review a facility's training materials (e.g., outlines, slide decks, training modules) in addition to all training records (above).

For more information regarding emergency preparedness and prevention requirements, or if you have other hazardous waste management questions, please contact:

Hazardous Materials Program – Hazardous Waste Section
Waste Management and Prevention Division
Vermont Department of Environmental Conservation
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
802-828-1138

<https://dec.vermont.gov/waste-management/hazardous>