

#### How To Develop an Emergency Plan

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#### **Tools To Help Write Your Plans**

- Knowledge about your facility and equipment is the best tool to have.
- Typically, don't need to pay consultants to write your Emergency Spill Plan(s), but include all the relevant information that you know about your facility and your inhouse capability in the plans.
- Keep the plans simple and straight forward.
- Use common sense.



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# Maintain and Update Fixed Facility and Transportation Emergency Response Plans









### Why Should I Have an Emergency Plan?

- Depending on your agricultural operation/business, regulatory agencies may require it (e.g., IDEM, OISC, IERC, and US EPA).
- An actual spill or release from your operation may trigger other regulations that require you to mitigate and document how you addressed the spill/release.
- An emergency response plan will save you money and lessen the impact to the environment, people, and other businesses in the event of a spill or release.
- Demonstrates to communities that when ag-related spills or releases, the ag community takes appropriate actions, which lessens the calls for additional regulations.



#### **Identify Receptors in Your Plans**

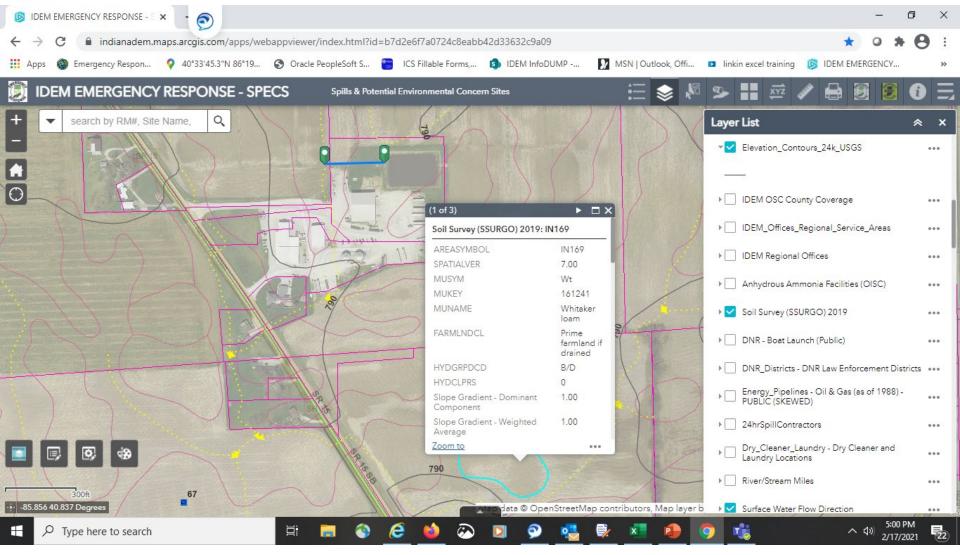
- Drainage ditches, swales, creeks and rivers.
- Drainage tiles.
- Drainage tile risers.
- Drainage tile blowouts.
- Perimeter drains (caution setting ASTs adjacent buildings).
- Storm drains and storm sewer catch basins.
- Drinking water wells.
- Rodent burrows (can lead to drainage tiles).
- Cracked soil (work the ground prior to a land application).
- Sink holes.
- Downwind homes and businesses.



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#### **Phone Numbers For Your Plans**

- IDEM spill line: 888-233-7745 (this is also the IERC phone number).
- National Response Center (NRC): 800-424-8802.
- Indiana 811 (request emergency locates).
- Downstream water users.
- Drinking water utility companies if located in delineated wellhead protection area and/or if a surface water intake is threatened.
- Excavation companies- dam building & interception trenches.
- Contractors who have various pumps, hoses, reels, etc.
- Spill contractors (best to already have established relationships).
- Neighboring property owners and friends.
- Ag chemical supplier after-hour emergency numbers.
- Emergency after-hour contact numbers for any resource listed in your plan.





## Tile Interception Trench or Recovery Sump







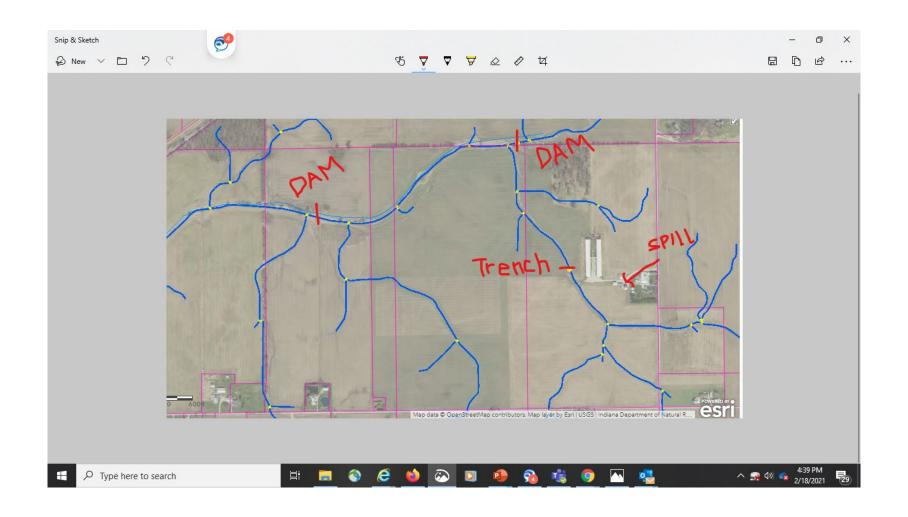
#### **Earthen Containment Dam**







#### **Plan Containment Dam Locations**







## Most Recovered Ag-Spill Material Is Handled as Product

#### **Product-regulated by OISC:**

- IDEM and OISC work together and usually allow the ag chemical impacted media to be land applied per the product label.
- The product label is the law.

#### Waste-regulated by IDEM:

- When recovered ag chemicals can't be applied per the products labels, it is considered a waste and must be disposed of correctly.
- Example: corn and soybean herbicide combination.
- Petroleum spills.





## **Underflow Dam for Petroleum Spills**







### **Underflow Dam**







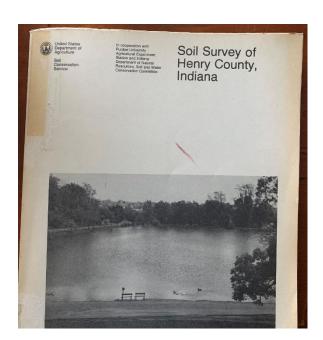
### **Drainage Tile Replacement**





#### **Old School Tools**

- Receive verbal permission to access neighboring properties in advance of an emergency.
- Walk the facility during significant rain events and see where runoff goes.
- Soil survey books.
- Topo maps.
- Tracer dye use to determine tile outfalls.
- Aerial photos.
- Phone numbers.
- Maintain drawings of drainage maps, tiles and access roads.
- Co-op/supplier risk coordinators.





#### **New School Tools**

- Maintain as-is drawings of drainage maps, tile locations, and access roads; institutional knowledge.
- Tracer dye to determine drainage tile outfall locations.
- Internet.
- GIS layered maps.
  - Parcel owners, surface drainage flow directions, topo map overlays, soil survey description overlays, measuring tool, current aerial imagery, surface ditch, creek, stream, and river overlays.
- Smart phones and 24/7 telephone numbers to call for help.
- Printout maps showing receptors and planned containment dam locations.
- Co-op a/o ag supplier risk coordinators and consultants.





## **Secondary Containment Failure**





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## Maintain List of Routine Deposable Materials

- Visqueen sheet plastic- heavy mil, and/or tarps.
- Floor dry (good to have a pallet of absorbents).
- Access to dam building soil (e.g., clay/glacial till).
- Sandbags.
  - Fill sandbags < ¾ full for dams.</li>
- Access to sand.
- Can of expandable foam.
- Drum liners or heavy mil trash bags.
- Straw bails.
- Petroleum boom and absorbent pads.





#### Worst Case Scenarios

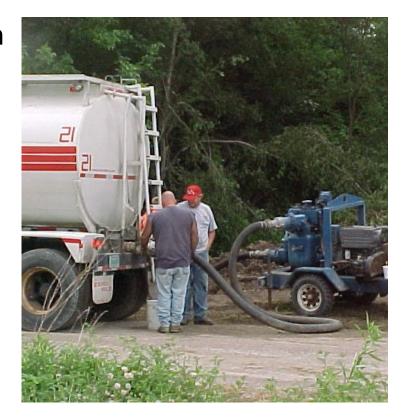
- Plan for the worst.
- Play devil's advocate.
- Plan for tornados, flooding, vandals, and disgruntled employees.
- Plan for spill events to occur at any time (e.g., weddings, school graduations, state fairs, holidays, or vacation).
- Confirm emergency contacts and phone numbers annually.
- Have electronic copies of plans that are accessible anywhere.





## Agriculture Chemical Spill Contractors

- List multiple contractors with 24/7 emergency contact numbers in your emergency plans.
- Research contractors to confirm the services they offer.
- Call in favors from friends and neighbors when a spill occurs; let them know IDEM is involved.

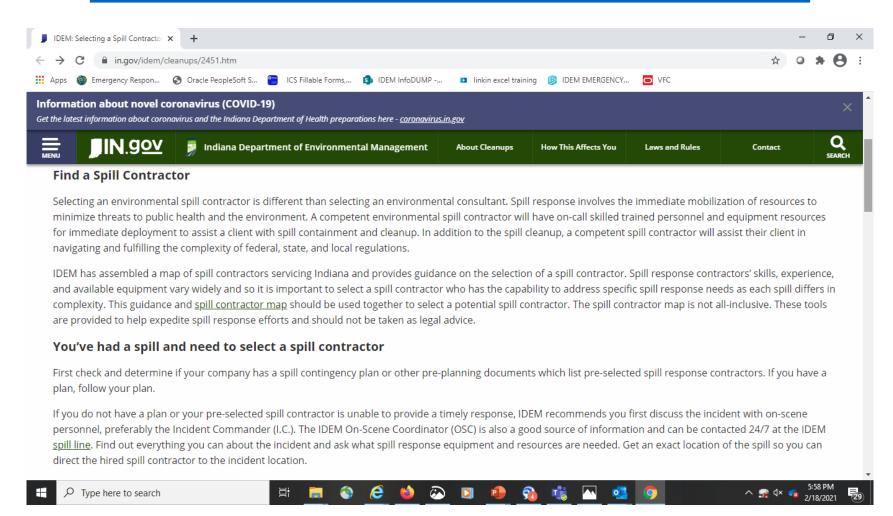






#### **IDEM Spill Contractors Website**

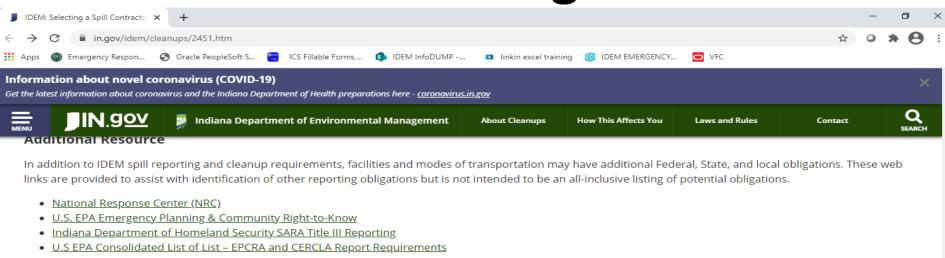
#### https://www.in.gov/idem/cleanups/2451.htm







### **IDEM Website Resources -Planning**



Following initial containment, spills often require remobilization to excavate contaminated soils. The excavations of these contaminated soils should be performed by qualified, bonded/insured competent contractors who comply with Federal, State, and local regulations. The following web links are provided as a tool to assist in roadway permitting and utility locates but is not intended to be an all-inclusive listing of potential permit or utility locate obligations.

- Indiana 811 Member Utility Locates
- Indiana Department of Transportation (INDOT)
  - Permits
  - Permit Forms
  - Manuals

Contractors performing spill response are required to meet and maintain Federal and State training certifications to ensure work is performed safely.

Indiana Department of Labor (IDOL), IOSHA































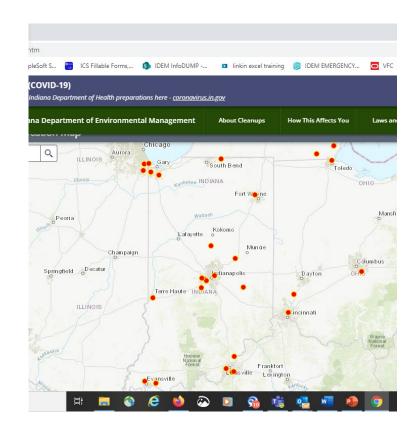






### **Transportation Emergency Plans**

- Transportation emergencies are much harder to plan.
- Emergency plan may include listing several emergency spill contractors and 24/7 telephone numbers.
- Visit IDEM's spill contractor website at <a href="https://www.in.gov/idem/cle">https://www.in.gov/idem/cle</a> anups/2451.htm.













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#### **Questions?**

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Report Environmental Spills 888-233-7745