

6. Plan Appraisal and Continuing Planning

6.1 Introduction

Any emergency plan must be evaluated and kept up-to-date through the review of actual responses, simulation exercises, and regular collection of new data. Effective emergency preparedness requires periodic review and evaluation, and the necessary effort must be sustained at the community level. Plans should reflect any recent changes in: the economy, land use, permit waivers, avail-

able technology, response capabilities, hazardous materials present, Federal and State laws, local laws and ordinances, road configurations, population change, emergency telephone numbers, and facility location. This chapter describes key aspects of appraisal and provides specific guidance for maintaining an updated hazardous materials emergency plan.

6.2 Plan Review and Approval

Plan review and approval are critically important responsibilities of the planning team. This section discusses the various means by which a plan can be reviewed thoroughly and systematically.

6.2.1. Internal Review

The planning team, after drafting the plan, should conduct an internal review of the plan. It is not sufficient merely to read over the plan for clarity or to search for errors. The plan should also be assessed for adequacy and completeness. Appendix D is an adaptation of criteria developed by the National Response Team that includes questions useful in appraising emergency plans. Individual planning team members can use these questions to conduct self review of their own work and the team can assign a committee to review the total plan. In the case of a hazardous materials appendix (or appendices) to a multi-hazard EOP, the team will have to review the basic EOP as well as the functional annexes to obtain an overall

assessment of content. Once the team accomplishes this internal review the plan should be revised in preparation for external review.

6.2.2. External Review

External review legitimizes the authority and fosters community acceptance of the plan. The review process should involve elements of peer review, upper level review, and community input. The planning team must devise a process to receive, review, and respond to comments from external reviewers.

► A. Peer Review

Peer review entails finding qualified individuals who can provide objective reviews of the plan. Individuals with qualifications similar to those considered for inclusion on the planning team should be selected as peer reviewers. Examples of appropriate individuals include:

- ☐ The safety or environmental engineer in a local industry;
- ☐ Responsible authorities from other political jurisdictions (e.g., fire chief, police, environmental and/or health officers);
- ☐ A local college professor familiar with hazardous materials response operations; and
- ☐ A concerned citizen's group, such as the League of Women Voters, that provides a high level of objectivity along with the appropriate environmental awareness.
- ☐ Invited reviews by key interest groups that provide an opportunity for direct participation for such groups that are not represented on the planning team; and
- ☐ Advisory councils composed of a relatively large number of interested parties that can independently review and comment on the planning team's efforts.

Exhibit 2 (Chapter 2, page 13) presents a comprehensive list of potential peer reviewers. Those selected as peer reviewers should use the criteria contained in Appendix D to develop their assessments of the plan.

► *B. Upper Level Review*

Upper level review involves submitting the plan to an individual or group with oversight authority or responsibility for the plan. Upper level review should take place after peer review and modification of the plan.

► *C. Community Input*

Community involvement is vital to success throughout the planning process. At the plan appraisal stage, such involvement greatly facilitates formal acceptance of the plan by the community. Approaches that can be used include:

- ☐ Community workshops with short presentations by planning team members followed by a question-and-answer period;
- ☐ Publication of notice "for comment" in local newspapers, offering interested individuals and groups an opportunity to express their views in writing;
- ☐ Public meetings at which citizens can submit oral and written comments;

These activities do more than encourage community consensus building. Community outreach at this stage in the process also improves the soundness of the plan by increased public input and expands public understanding of the plan and thus the effectiveness of the emergency response to a hazardous materials incident.

► *D. State/Federal Review*

After local review and testing through exercises, a community may want to request review of the plan by State and/or Federal officials. Such a review will depend upon the availability of staff resources. Planning committees set up in accordance with Title III of SARA are to submit a copy of the emergency plan to the State emergency response commission for review to ensure coordination of the plan with emergency plans of other planning districts. Federal Regional Response Teams may review and comment upon an emergency plan, at the request of a local emergency planning committee. FEMA Regional offices review FEMA-funded multi-hazard EOPs using criteria in CPG 1-8A.

6.2.3. Plan Approval

The planning team should identify and comply with any local or State requirements for formal plan approval. It may be necessary for local officials to enact legislation that gives legal recognition to the emergency plan.

6.3 Keeping the Plan Up-to-Date

All emergency plans become outdated because of social, economic, and environmental changes. Keeping the plan current is a difficult task, but can be achieved by scheduling reviews regularly. As noted in Chapter 5, the plan itself should indicate who is responsible for keeping it up-to-date. Outdated information should be replaced, and the results of appraisal exercises should be incorporated into the plan. The following techniques will aid in keeping abreast of relevant changes:

- ☐ Establish a regular review period, preferably every six months, but at least annually. (Title III of SARA requires an annual review.)
- ☐ Test the plan through regularly scheduled exercises (at least annually). This testing should include debriefing after the exercises whenever gaps in preparedness and response capabilities are identified.
- ☐ Publish a notice and announce a comment period for plan review and revisions.
- ☐ Maintain a list of individuals, agencies, and organizations that will be interested in participating in the review process.
- ☐ Make one reliable organization responsible for coordination of the review and overall stewardship of the plan. Use of the planning team in this role is recommended, but may not be a viable option due to time availability constraints of team members.
- ☐ Require immediate reporting by any facility of an increase in quantities of hazardous materials dealt with in the emergency plan, and require review and revision of plan if needed in response to such new information.
- ☐ Include a "Record of Amendments and Changes" sheet in the front section of the plan to help users of the plan stay abreast of all plan modifications.
- ☐ Include a "When and Where to Report Changes" notice in the plan and a request for holders of the plan to report any changes or suggested revisions to the responsible organization at the appropriate time.
- ☐ Make any sections of the plan that are subject to frequent changes either easily replaceable (e.g., looseleaf, separate appendix), or provide blank space (double- or triple-spaced typing) so that old material may be crossed out and new data easily written in. This applies particularly to telephone rosters and resource and equipment listings.

The organization responsible for review should do the following:

- ☐ Maintain a list of plan holders, based on the original distribution list, plus any new copies made or distributed. It is advisable to send out a periodic request to departments/branches showing who is on the distribution list and asking for any additions or corrections.
- ☐ Check all telephone numbers, persons named with particular responsibilities, and equipment

locations and availability. In addition, ask departments and agencies to review sections of the plan defining their responsibilities and actions.

- ☐ Distribute changes. Changes should be consecutively numbered for ease of tracking. Be specific, e.g., "Replace page ___ with the attached new page ___," or "Cross out ___ on page ___ and write in the following" (new phone number, name, location, etc.). Any key change (new emergency phone number, change in equipment availability, etc.) should be distributed as soon as it occurs. Do not wait for the regular review period to notify plan holders.
- ☐ If possible, the use of electronic word processing is recommended because it facilitates changing the plan. After a significant number of individual changes, the entire plan should be redistributed to ensure completeness.
- ☐ If practical, request an acknowledgement of changes from those who have received changes. The best way to do this is to include a self-addressed postcard to be returned with acknowledgement (e.g., "I have received and entered changes dated __. Signed __").
- ☐ Attend any plan critique meetings and issue changes as may be required.
- ☐ Integrate changes with other related plans.

6.4 Continuing Planning

In addition to the periodic updates described above, exercises, incident reviews, and training are necessary to ensure current and effective planning.

6.4.1 Exercises

The plan should also be evaluated through exercises to see if its required activities are effective in practice and if the evaluation would reveal more efficient ways of responding to a real emergency. As noted in Chapter 5, the plan itself should indicate who is responsible for conducting exercises. Simulations can be full-scale, functional, or tabletop exercises.

A full-scale exercise is a mock emergency in which the response organizations that would be involved in an actual emergency perform the actions they would take in the emergency. These simulations may focus on limited objectives (e.g., testing the capability of local hospitals to handle relocation problems). The respon-

sible environmental, public safety, and health agencies simulate, as realistically as possible, notification, hazards identification and analysis, command structure, command post staging, communications, health care, containment, evacuation of affected areas, cleanup, and documentation. Responders use the protective gear, radios, and response equipment and act as they would in a real incident. These multi-agency exercises provide a clearer understanding of the roles and resources of each responder.

A functional exercise involves testing or evaluating the capability of individual or multiple functions, or activities within a function.

A low-cost, valuable version of an exercise is the staging of a tabletop exercise. In this exercise, each agency representative describes and acts out what he or she

would do at each step of the response under the circumstances given.

Exercises are most beneficial when followed by a meeting of all participants to critique the performance of those involved and the strengths and weaknesses of the plan's operation. The use of an outside reviewer, free of local biases, is desirable. The emergency plan should be amended according to the lessons learned. Provisions should be made to follow up exercises to see that identified deficiencies are corrected.

Communities that want help in preparing and conducting exercises should consult FEMA's four-volume "Exercise Design Course," which includes sample hazardous materials exercises. CMA's *Community Emergency Response Exercise Handbook* is also helpful. CMA describes four types of exercises: tabletop, emergency operations simulation, drill, and field exercise.

6.4.2 Incident Review

When a hazardous materials incident does occur, a review or critique of the incident is a means of evaluating the plan's effectiveness. Recommendations for conducting an incident review are:

- ☐ Assign responsibility for incident review to the same organization that is responsible for plan update, for example, the planning team.
- ☐ Conduct the review only after the emergency is under control and sufficient time has passed to allow emergency respondents to be objective about the incident.
- ☐ Use questionnaires, telephone interviews, or personal interviews to obtain comments and suggestions from emergency respondents. Follow-up on non-respondents.
- ☐ Identify plan and response deficiencies: items that were over-

looked, improperly identified, or were not effective.

- ☐ Convene the planning team to review comments and make appropriate plan changes.
- ☐ Revise the plan as necessary. Communicate personal or departmental deficiencies informally to the appropriate person or department. Follow up to see that deficiencies are corrected.

6.4.3 Training

Training courses can help with continuing planning by sharpening response personnel skills, presenting up-to-date ideas/techniques, and promoting contact with other people involved in emergency response. Everyone who occupies a position that is identified in the plan must have appropriate training. This applies to persons at all levels who serve to coordinate or have responsibilities under the plan, both those directly and indirectly involved at the scene of an incident. One should not assume that a physician in the emergency room or a professional environmentalist is specifically trained to perform his/her assigned mission during an emergency.

The training could be a short briefing on specific roles and responsibilities, or a seminar on the plan or on emergency planning and response in general. However the training is conducted, it should convey a full appreciation of the importance of each role and the effect that each person has on implementing an effective emergency response.

Training is available from a variety of sources in the public and private sectors. At the Federal level, EPA, FEMA, OSHA, DOT/RSPA and the USCG offer hazardous materials training. (In some cases, there are limits on attendance in these courses.) FEMA, EPA, and other NRT agencies cooperatively offer the inter-agency "train-the-trainer" course, Haz-

ardous Materials Contingency Planning, at Emmitsburg, MD and in the field.

Title III of SARA authorizes Federal funding for training. Communities seeking training assistance should consult appropriate State agencies. States may consult with the RRT and the various Federal Regional and district offices. (See Appendix F.)

In addition to government agencies, consult universities or community colleges (especially any fire science curriculum courses), industry associations, special interest groups, and the private sector (fixed facilities, shippers, and carriers). Many training films and slide presentations can be borrowed or rented at little cost. Many chemical companies and carriers provide some level of training free.

The Chemical Manufacturers Association has a lending library of audio-visual training aids for use by personnel who respond to emergencies involving chemicals. The training aids are available on a loan basis at no charge to emergency response personnel and the public sector.

Training aids can also be purchased from:

National Chemical Response and
Information Center
Chemical Manufacturers Association
2501 M Street, N.W.
Washington, DC 20037

In addition to classroom training, response personnel will need hands-on experience with equipment to be used during an emergency.

Communities should provide for refresher training of response personnel. It is not sufficient to attend training only once. Training must be carried out on a continuing basis to ensure currency and capability. Some communities have found it effective to hold this refresher training in conjunction with an exercise.

The NRT, through its member agencies, is developing a strategy to address issues related to emergency preparedness and response for hazardous materials incidents. The training strategy includes: (1) improved coordination of available Federal training programs and courses; (2) sharing information about available training, and lessons learned from responses to recent hazardous materials incidents; (3) the increased use of exercises as a training method; (4) the revision of existing core courses, and the development of any needed new core courses that prepare responders to do the actual tasks expected in their own communities; and (5) decentralizing the delivery of training so that it is more easily available to responders. Further information about this training strategy can be obtained from EPA or FEMA offices in Washington, DC (see page F-1 for addresses).