

# **Memphis/Shelby County**

Local Emergency  
Planning Committee

## **Hazardous Materials Plan**

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## Goal

The goal of the Memphis/Shelby County LEPC Hazardous Materials Emergency Response Plan is to help ensure the safe response and help provide protection to the public from a hazardous materials incident.

## Purpose and Scope

This Hazardous Materials Emergency Response Plan is prepared in accordance with PL 99-499 Section 303. The plan is written to cover the required jurisdictional boundaries for the Memphis/Shelby County LEPC. The Memphis/Shelby County LEPC covers all of Memphis and Shelby County.

This plan compliments and expands on sectors in the Memphis/Shelby County Emergency Management Plan. It is intended to assist governmental agencies, businesses, and response entities in their response to the release of hazardous materials within the boundaries of Memphis and Shelby County resulting from naturally occurring events, industrial accidents, terrorism, or illegal activities.

The required scope of the plan is restricted to fixed facilities with specific quantities of reportable materials. Releases of hazardous materials, however, may occur as the result of transportation activities on land or in the marine environment and at facilities exempted from reporting under SARA Title III. This plan endeavors to include contingencies for all these types of events.

This plan is intended to be coordinated with federal, state, and other local plans, should the event require inter-jurisdictional coordination.

## Limitations

This plan is limited in scope by restrictions due to both financial and training constraints. Responding agencies to a hazardous material incident will respond consistent with their training and capability.

## General

Public health and safety and the protection of life and property are legal responsibilities of government. Government will perform emergency functions within their jurisdictional boundaries. Additionally, they shall conduct such functions outside their jurisdictions as may be required pursuant to current resources, ordinances, and mutual aid agreements.

## Authorities

This plan is written consistent with PL 99-499.

## Planning Assumptions

- The Memphis/Shelby County area has 3 municipal hazmat response teams. These are provided by the Memphis Fire Department, Germantown Fire Department, and Shelby County Fire Department. Additionally, mutual aid groups and hazmat response teams located within Shelby County, which can handle chemical incidents at their plant site may respond to assist other jurisdictions when requested. All of these hazmat teams conduct joint training and operate similarly. Support for a large scale Haz-Mat incident will come from Shelby County Office of Preparedness (SCOP) and their emergency support functions, such as public works, parks, MLGW, etc.
- There are multiple facilities and transportation routes which could sustain a hazardous materials incident. A list of these facilities and routes is maintained by SCOP.
- Tennessee Department of Environment and Conservation (TDEC) will assist in situations beyond the scope of the local authority.

## Emergency/Disaster Hazards and Conditions

Hazardous materials are transported, stored, and used throughout Memphis and Shelby County daily. Conditions that could lead to a hazardous materials incident include, but are not limited to:

- Traffic accidents
- Train derailments
- Earthquakes
- Sabotage/terrorist activities
- Severe weather conditions
- Facility releases

## Direction and Control of Hazardous Material Response Activities

### *General*

Local command of a hazardous materials incident will follow the concepts of the Incident Command System (ICS) and the National Incident Management System (NIMS).

The *affected facility* has the responsibility for mitigating the adverse effects of the release, within their capability and training.

The *affected political subdivision (i.e., Memphis, Germantown, Collierville, Millington, etc.)* has the *primary responsibility* for protecting life, property and environment threatened by hazardous materials incidents, except in those areas specifically preempted by state or federal law. Local public safety agencies are primarily responsible for initial assessment of the situation, attempt identification of materials involved, incident coordination, securing the site, rescue and medical treatment of the injured if safe to do so, defensive measures or confinement if properly trained to do so and/or evacuation of people if endangered. Post clean up and mitigation is the responsibility of the responsible party, if known.

When *local agencies (fire services and/or law enforcement, etc.)* have incident command responsibilities, the state and federal function will be to support and coordinate with the local responders, when requested.

When *outside personnel and resources are working in support of local response agencies*, private, state, or federal personnel will maintain their normal chain of command and supervision. They will respond to tasks and assignments through or in conjunction with the on-scene Incident command System.

Upon notification of a hazardous materials incident, SCOP will notify the Tennessee Emergency Management Agency (TEMA) and obtain a state emergency management mission number to extend liability coverage to registered local volunteers and equipment responding in a specialized or general support capacity.

Response to a hazardous materials incident will be defensive in nature and responding departments will perform only to the level trained. Primary consideration will be given to the public safety.

Command of a hazardous materials incident will be initially from a field command post location. The Emergency Operations Center (EOC) may be activated if necessary to assist with coordination efforts.

## *Organization*

Memphis/Shelby County hazardous materials response is based on the unified command concept. The authority having jurisdiction will assume the role of incident commander.

Incident command in the jurisdiction does not imply any innate ability to provide response resources or trained response personnel within the jurisdiction. It is meant solely to provide trained leadership and management of the existing and available resources to respond to the releases or impending releases.

Hazardous materials incidents will follow the concepts of NIMS and ICS; in most cases unified command will be utilized. The unified command will be made up of the incident command agency, local fire agency, along with the local law enforcement agency, and any other appropriate agency as determined by the Incident Commander/ Authority Having Jurisdiction (AHJ).

Normal day-to-day organizational structures and chains of command will be maintained in government and supporting organizations.

## Concept of Operations

### *Procedures:*

When a hazardous materials incident occurs, the incident commander should:

- Establish an isolation area and move all people out of the affected area.
- Establish perimeter control/area security.
- Identify hot, warm, and cold zone.
- Identify the hazardous material if qualified and safely possible.
- Make appropriate local, state, and federal notifications.
- Establish and identify command post and staging locations.
- Establish ICS using NIMS guidelines and framework.
- Develop a site safety plan.
- Establish decontamination, as appropriate.

- Call for necessary help from mutual aid jurisdiction, Tennessee Emergency Management Agency, and Tennessee Department of Environment and Conservation, as appropriate. Additional assistance, including identification of other hazmat Teams, may be obtained through the Tennessee Fire Chiefs Tennessee State Emergency Response Plan.
- Ensure public health departments are advised and incorporated into the command system.
- Monitor progression of the incident.
- Work with appropriate agencies to determine site safety and when to declare the incident over and allow people back into the area.
- Hold an after action meeting.

### *Mitigation Activities*

- Work with facilities to assess reduction of the quantity of the hazardous chemicals which are on site.
- Encourage businesses which use hazardous chemicals to develop and maintain safe arrangements, such as containment barriers.

### *Preparedness Activities*

- Tier two facilities must maintain and update locations where hazardous materials are stored, used, and/or produced.
- Ensure all public safety responders are supplied with pertinent information on these materials (Tier Two reporting).
- Each emergency response agency shall ensure their personnel who have the potential of responding to a Hazardous materials incident have the appropriate level of training.
- Work with the LEPC member organizations to hold hazardous materials exercises (drills) on at least an annual basis.
- Encourage all public safety agencies have adequate quantities of U.S. DOT Emergency Response Guides.
- All emergency response agencies should ensure personnel have the appropriate level of Personal Protective Equipment (PPE) for expected responses.
- Provide Shelter-in-Place Training and make available training materials such as SIP Booklets, SIP Kits, etc.
- Review and provide assistance to Tier Two Reporters to develop and update facility emergency response plans.

## *Evacuation*

If evacuation becomes necessary, then:

- Work as a team. The team may be fire department personnel, EMS, police, etc. There should be a designated Incident Commander/Unified Command (IC/UC) with a well prepared plan to follow.
- Evacuation orders will be made by IC/UC and elected officials.
- Evacuation will normally be the primary responsibility of the local law enforcement agency.
- Determine area to be evacuated and approximate number of people to be evacuated.
- SCOP will determine evacuation routes – DO NOT route evacuees through possible contaminated areas.
- Establish traffic control points and implement them.
- WARN THE PUBLIC. Give evacuation orders and give the public instructions as to when to go and what to do. This may be accomplished through radio and television announcements, use of vehicle public announcement systems, by going door to door, via the Alert FM system, or any other method or means available.
- Tier Two facilities should have a system in place to account for all personnel after safely evacuating their facilities.

## *Communications*

- Follow prescribed procedures set forth by the jurisdiction which has initial responsibility for handling the incident.
- If the incident develops into a large scale and/or multi-agency incident, a communications coordinator, such as a Communications Unit Leaders (COML) shall coordinate the various communications needs of the responding agencies. A mobile command/communications vehicle may be utilized to assist with this coordination.
- The on-scene Incident Commander shall maintain communications with SCOP and the Tennessee Emergency Management Agency as needed.

## *Search and Rescue*

Search and rescue is a legal obligation of the local Authority Having Jurisdiction (AHJ). The appropriate Personal Protective Equipment shall be used to affect entry into the hot zone to effect search and rescue. Specific training is required as well as equipment and adequate medical condition of members of the entry team must be established.



### *Good Samaritan Law*

Any person or public agency whose assistance has been requested by the Authority Having Jurisdiction in accordance with the Tennessee Mutual Aid Law (TN Code Annotated Title 58, Chapter 8), who, in good faith, renders emergency care, assistance, or advice with respect to a hazardous materials incident, shall have limited liability in accordance with the Tennessee Mutual Aid Law and other Tennessee statutes for civil damages resulting from any act or omission in the rendering of such care, assistance, or advice, other than acts or omissions constituting gross negligence or willful or wanton misconduct.

### *Recovery and Cleanup*

Responsibilities for emergency actions are very different from those for cleanup of a hazardous materials event. While local public safety agencies may play a part in emergency response, they do not handle cleanup. It is the responsibility of the Responsible Party to pay for cleanup. In cases where the Responsible Party cannot be identified, SCOP is will designate a clean-up vendor and pay associated cleanup costs. TDEC is the lead agency for overseeing the cleanup and disposal of hazardous materials and waste. The U.S. Coast Guard (USCG) is the incident command agency for inland waterways and shares oversight with TDEC.

### Responsibilities

#### Law Enforcement

- Scene control and security
- Evacuation
- Special Ops - Bomb, SWAT, and other special operations will assist as necessary
- Traffic and crowd control
- Scene isolation and security
- Assist with evacuation in the cold zone
- Assist with warning and emergency information
- Conduct drug lab related activities where hazardous materials may be found
- Provide a senior command level supervisor to work as part of a unified command at the Incident Command Post
- Provide a representative to the Emergency Operations Center, as required
- Participate in decontamination, as necessary

## Fire Department

- Fire suppression
- Response to hazardous materials incidents
- Search and rescue activities, only when their level of protective equipment is appropriate for the incident as defined by the Incident Commander
- Medical aid support
- Evacuation support
- Decontamination support and emergency decontamination as appropriate
- Provide representative to Emergency Operations Center, as required

## Emergency Medical Services/Ambulance Companies

- Patient care and transportation
- Follow local protocol for transporting of contaminated patients
- On-scene medical surveillance of responders
- Establish on-scene medical command and coordination with hospital, as appropriate
- Provide assistance with decon as needed

## Emergency Management

- Warning and public information coordination
- Providing mobile command post/communications support
- Resource coordination
  - Evacuation coordination with Red Cross
  - Technical support
- Notification of appropriate agencies, including TEMA, USCG, etc.
- Coordination with TEMA and TDEC.

## Memphis/Shelby County Health Department

- Coordinate with hospitals regarding medical treatment of victims.
- Coordinate and provide emergency health services, including disease control, immunizations, quarantine procedures, and support first aid needs as necessary through coordination with other agencies.
- Coordinate and provide environmental health services, including inspections for food and water, contamination, inspections of temporary housing and disposal of solid wastes.
- Conduct public information and education program of health related issues.
- Provide a representative to the command staff liaison, as requested.
- Provide radiological, technical and support assistance to the authority having jurisdiction.

## Public Works

- Heavy equipment support, as appropriate.
- Supply as necessary, defensive confinement materials ( i.e., dirt, gravel, etc.)
- Provide a representative to the liaison or operations chief as required.

## Industry/Facilities

- Provide appropriate level manager to the incident command post as requested. This person will report to the command post with the SDS book and site safety plan.
- Provide for timely evacuation and site security for facilities affected by hazardous materials incidents.
- Provide for worker safety and shutdown of operations as needed during hazardous materials incidents.
- Provide timely public warning and notification of hazardous release from facilities.
- Coordinate activities with emergency management when releases affected utilities.
- Provide information to the media (via the public information officer).
- Make all notification required by law.
- Maintain and coordinate plans as required by law.
- Provide a representative to the command post or Emergency Operations Center, as requested. This person should have a knowledge of the facility and its
- Perform emergency responses within their personnel's training and capabilities

## Appendix A

### *Distribution List*

Shelby County Fire Department  
Memphis Fire Department  
Memphis Office of Emergency Management  
Germantown Fire Department  
Memphis Police Department  
Shelby County Sheriff Department  
Tennessee Emergency Management Agency  
Tennessee Department of Environment and Conservation  
United States Coast Guard  
Shelby County Health Department  
Shelby County Office of Preparedness  
City of Memphis Division of Public Works  
Memphis & Shelby County Hospitals  
American Red Cross Mid-South Chapter

## Appendix B

### *Suggested Response Safety Plan*

**INSTRUCTIONS FOR COMPLETING THE SITE SAFETY AND CONTROL PLAN  
ICS 208 HM**

**A Site Safety and Control Plan must be completed by the Hazardous Materials Group Supervisor and reviewed by all within the Hazardous Materials Group prior to operations commencing within the Exclusion Zone.**

Item Number	Item Title	Instructions
1.	Incident Name/Number	Print name and/or incident number.
2.	Date and Time	Enter date and time prepared.
3.	Operational Period	Enter the time interval for which the form applies.
4.	Incident Location	Enter the address and or map coordinates of the incident.
5 - 16.	Organization	Enter names of all individuals assigned to ICS positions. (Entries 5 & 8 mandatory). Use Boxes 15 and 16 for other functions: i.e. Medical Monitoring.
17 - 18.	Entry Team/Decon Element	Enter names and level of PPE of Entry & Decon personnel. (Entries 1 - 4 mandatory buddy system and back-up.)
19.	Material	Enter names and pertinent information of all known chemical products. Enter UNK if material is not known. Include any which apply to chemical properties. (Definitions: ph = Potential for Hydrogen (Corrosivity), IDLH = Immediately Dangerous to Life and Health, F.P. = Flash Point, I.T. = Ignition Temperature, V.P. = Vapor Pressure, V.D. = Vapor Density, S.G. = Specific Gravity, LEL = Lower Explosive Limit, UEL = Upper Explosive Limit)
20 - 23.	Hazard Monitoring	List the instruments which will be used to monitor for chemical.
24.	Decontamination Procedures	Check NO if modifications are made to standard decontamination procedures and make appropriate Comments including type of solutions.
25 - 27.	Site Communications	Enter the radio frequency(ies) which apply.
28 - 29.	Medical Assistance	Enter comments if NO is checked.
30.	Site Map	Sketch or attach a site map which defines all locations and layouts of operational zones. (Check boxes are mandatory to be identified.)
31.	Entry Objectives	List all objectives to be performed by the Entry Team in the Exclusion Zone and any parameters which will alter or stop entry operations.
32 - 33.	SOP s, Safe Work Practices, and Emergency Procedures	List in Comments if any modifications to SOP s and any emergency procedures which will be affected if an emergency occurs while personnel are within the Exclusion Zone.
34 - 36.	Safety Briefing	Have the appropriate individual place their signature in the box once the Site Safety and Control Plan is reviewed. Note the time in box 34 when the safety briefing has been completed.

Memphis/Shelby County LEPC Hazmat Plan

<b>SITE SAFETY AND CONTROL PLAN</b> ICS 208 HM		1. Incident Name:	2. Date Prepared:		3. Operational Period: Time:							
<b>Section I. Site Information</b>												
4. Incident Location:												
<b>Section II. Organization</b>												
5. Incident Commander:		6. HM Group Supervisor:		7. Tech. Specialist - HM Reference:								
8. Safety Officer:		9. Entry Leader:		10. Site Access Control Leader:								
11. Asst. Safety Officer - HM:		12. Decontamination Leader:		13. Safe Refuge Area Mgr:								
14. Environmental Health:		15.		16.								
17. Entry Team: (Buddy System) Name: PPE Level				18. Decontamination Element: Name: PPE Level								
Entry 1				Decon 1								
Entry 2				Decon 2								
Entry 3				Decon 3								
Entry 4				Decon 4								
<b>Section III. Hazard/Risk Analysis</b>												
19. Material:	Container type	Qty.	Phys. State	pH	IDLH	F.P.	I.T.	V.P.	V.D.	S.G.	LEL	UEL
Comment:												
<b>Section IV. Hazard Monitoring</b>												
20. LEL Instrument(s):					21. O <sub>2</sub> Instrument(s):							
22. Toxicity/PPM Instrument(s):					23. Radiological Instrument(s):							
Comment:												
<b>Section V. Decontamination Procedures</b>												
24. Standard Decontamination Procedures:								YES:	NO:			
Comment:												
<b>Section VI. Site Communications</b>												
25. Command Frequency:			26. Tactical Frequency:			27. Entry Frequency:						
<b>Section VII. Medical Assistance</b>												
28. Medical Monitoring:		YES:	NO:	29. Medical Treatment and Transport In-place:			YES:	NO:				
Comment:												

<b>Section VIII. Site Map</b>		
30. Site Map:		
↑		
Weather <input type="checkbox"/>	Command Post <input type="checkbox"/>	Zones <input type="checkbox"/>
Assembly Areas <input type="checkbox"/>	Escape Routes <input type="checkbox"/>	Other <input type="checkbox"/>
<b>Section IX. Entry Objectives</b>		
31. Entry Objectives:		
<b>Section X. SOP S and Safe Work Practices</b>		
32. Modifications to Documented SOP s or Work Practices:	YES:	NO:
Comment:		
<b>Section XI. Emergency Procedures</b>		
33. Emergency Procedures:		
<b>Section XII. Safety Briefing</b>		
34. Asst. Safety Officer - HM Signature:	Safety Briefing Completed (Time):	
35. HM Group Supervisor Signature:	36. Incident Commander Signature:	



## Appendix C

### *Basic ICS Organization*

Figure 1 — Incident Command System Structure



## Appendix D

### *Definitions/Acronyms*

PL 99-499 – SARA TITLE III -- EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW

Tier two - Hazardous Chemical Inventory submitted by facilities to the Local Emergency Planning Committee (LEPC), the State Emergency Response Commission (SERC), and the local fire department annually

SCOP – Shelby County Office of Preparedness

USCG – United States Coast Guard

CAMEO/ALOHA – Air dispersion modeling software

## Appendix E

### *Hazardous Material Response Contractors*

1. HEPACO, Inc.  
731 East Brooks Road, Memphis, TN 38116  
Local Tel +1 (901) 345-6333  
Emergency Response Tel +1 (800) 888-7689  
Fax +1 (901) 353-5982 Cannot verify  
HEPACO is an emergency response, industrial services, environmental remediation, abatement services, maritime services and non-hazardous waste water treatment company. Full-Service Emergency Response and Environmental Remediation; OSRO & CHEMNET Contractor  
Web
2. Clean Harbors Environmental Services, Inc.  
5399 E Holmes Rd, Memphis, TN 38118  
Local Tel +1 (901) 730-4190  
Emergency Response Tel +1 (800) 645-8265  
Fax +1 (901) 365-0733 Cannot verify  
provides a broad range of vertically integrated hazardous and not-hazardous material management services. These include collection, packaging, transportation, recycling, treatment, and disposal services, which are offered at Company-owned recycling, incineration, landfill, wastewater, and other treatment facilities.  
Web
3. First Response Inc  
2601 Frisco Ave. Memphis, TN 38114  
Local Tel +1 (901) 396-9110  
Corporate Tel +1 (800) 914-9111  
Fax +1 (901) 396-2126 cannot verify  
Emergency Response, Industrial Cleaning, Remediation, Waste Disposal & Consulting Services  
Web
4. B & P Enterprises  
6230 MS-301, Walls, MS 38680  
Local/Emergency Tel + 1 (662) 781-2780  
Verified Fax +1 (662)781-2867  
B&P provides derailment cleanup, hazardous material emergency response, environmental remediation services and we specialize in disaster response.  
Web
5. Hill Industrial & Environmental Services  
4940 Covington Way, Memphis, TN 38128  
Local Tel +1 (901) 388-7500  
Toll Free Tel +1 (877) 873-4455  
Verified Fax +1 (901) 382-8456  
quality services to the Mid-South including tank cleaning, removal of hazardous materials, industrial cleaning and vacuum, waste disposal, and much more

Web

6. Jim's Tank Service  
PO Box 281431 Memphis, TN 38168  
Local/Emergency Tel +1 (901) 357-7237  
Verified Fax +1 (870) 732-2029  
hazardous or not, we can take care of your fuel tanks, sediment ponds, process tanks, grease traps, wash basins, barges, and much more  
Web  
OSRO approved responder, industrial services, hazmat, oil recyclers, remediation/disposal
  
7. SWS Environmental Services  
9150 Hacks Cross Rd, Olive Branch, MS 38654  
Local Phone (662) 890-8670  
Emergency Tel 850-234-8428  
Verified Fax 662-890-8674  
environmental services company with expertise in planned remediation, land- and water-based emergency response, industrial services, demolition, training, and technical services. Non-emergency projects consist of anything and everything environmentally related, including plant decommissioning and demolition, tank cleaning, OSHA training, waste transportation and disposal, vacuum trucks services, confined space entry, landfill cap and construction, environmental restoration, dredging, solidification, and containment systems  
Web
  
8. U.S Environmental Services LLC  
3450 McCracken Road Hernando MS 38632  
Local Tel +1 (662) 280-3232  
Emergency Tel +1 (888) 279-9930  
Verified Fax +1 (662) 280-3011  
USES specializes in environmental emergency response, industrial services/remediation/demolition. From routine in-plant cleaning and maintenance to emergency HAZMAT release or oil spill response  
Web

1.