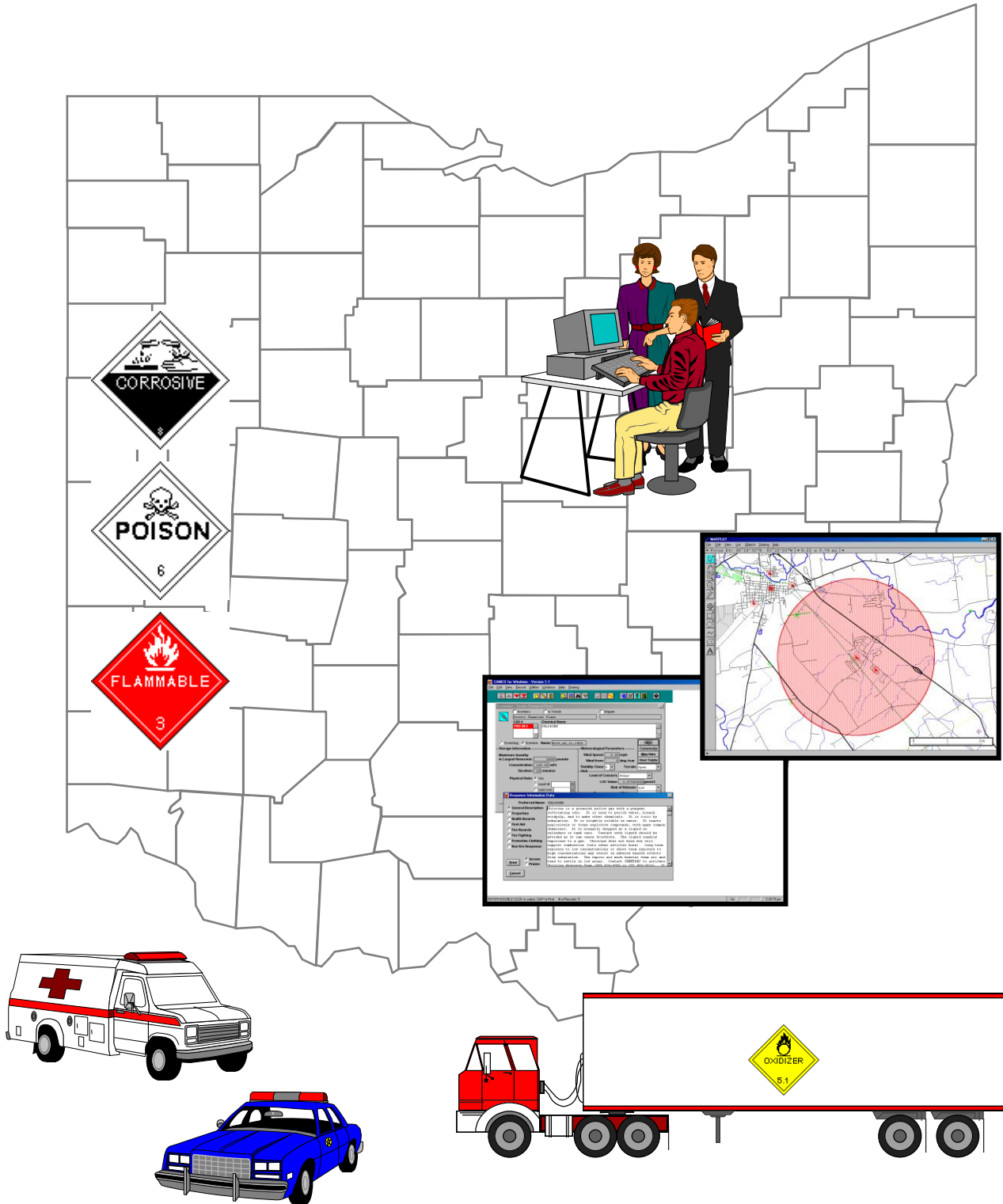


the Ohio Hazardous Materials Planning and Exercise Guidance Booklet



**OHIO EMERGENCY MANAGEMENT AGENCY
2855 WEST DUBLIN GRANVILLE ROAD
COLUMBUS, OHIO 43235-2206**

THE STATE EMERGENCY RESPONSE COMMISSION (SERC) HAS REVIEWED AND APPROVED THIS REVISED OHIO HAZARDOUS MATERIALS PLANNING AND EXERCISE GUIDANCE BOOKLET AND HAS DIRECTED THAT IT BE DISTRIBUTED TO OHIO'S LOCAL EMERGENCY PLANNING COMMITTEES (LEPC's).

THE TWO CHAPTERS CONTAINED IN THIS BOOKLET PROVIDE THE LEPC MEMBERS AN EASY REFERENCE TO ASSIST THEM WITH THEIR HAZARDOUS MATERIALS EMERGENCY RESPONSE AND PREPAREDNESS PLAN AND ANNUAL HAZARDOUS MATERIALS EXERCISE PLANNING.

THIS BOOKLET WAS PREPARED BY THE OHIO EMERGENCY MANAGEMENT AGENCY AND REPLACES THE HAZARDOUS MATERIALS PLANNING AND EXERCISE GUIDANCE DOCUMENT, Jan. 2003.

ALL COMMENTS AND/OR RECOMMENDATIONS REGARDING THIS BOOKLET SHOULD BE FORWARDED TO:

**THE OHIO EMERGENCY MANAGEMENT AGENCY
ATTN: FIELD OPERATIONS BRANCH,
2855 WEST DUBLIN GRANVILLE ROAD,
COLUMBUS, OHIO 43235-2206.**

Revised January 2015

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CHAPTER ONE

DEVELOPING THE CHEMICAL EMERGENCY RESPONSE AND PREPAREDNESS PLAN

I. INTRODUCTION:

A. General - The following contains guidance, information and instructions on the preparation and submission of the Chemical Emergency Response and Preparedness Plan, and/or Plan Updates, to the State Emergency Response Commission (SERC).

B. Purpose - To provide Ohio's Local Emergency Planning Committees (LEPC's) an easy to read document which outlines the laws and rules governing the development, updating and annual review requirements for the County's Chemical Emergency Response and Preparedness Plan thereafter called 'The Plan'.

C. Scope - Areas addressed herein are as follows;

1. **General** - This chapter addresses planning authority, the Plan review and evaluation process, provides a definition of the Standard of Care, and identifies the planning activities required by Chapter 3750 of the Ohio Revised Code. State Emergency Response Commission (SERC) responsibilities and the Ohio Emergency Management Agency's role in the planning process are also addressed.
2. **Authority** - Chapter 3750 of the Ohio Revised Code (ORC) and the 3750 series of the Ohio Administrative Code (OAC) Rules, as they apply to the development and evaluation of the Plan, are outlined in Section II.
3. **Standard of Care** - Section III defines and explains the Standard of Care, as adopted by the SERC, which LEPC members need to be aware of when developing the Plan.
4. **Informal Reviews** - Section IV provides an explanation on how LEPC's can request an informal, unofficial, review of their Plan by OEMA Field Liaisons.
5. **Formal Reviews** - Section V provides a description of the formal plan review with emphasis on the responsibilities of the LEPC and the SERC appointed plan reviewers, the OEMA Field Liaisons.
6. **Submission of Plans for Annual Review** - Section VI outlines procedures the LEPC's are to follow when submitting Plans for Annual Review. 7. **State Emergency Response Commission.** Section VII provides a brief discussion of SERC's actions regarding Concurrence and Refusal to Concur with the Plan.

II. AUTHORITY: A review of the Ohio Revised Code, Chapter 3750 and the Ohio Administrative Rules for 3750 is provided for reference, and to help clarify the plan requirements for the LEPC members.

A. Plan Development:

Ohio Revised Code, Chapter 3750, Section 3750.04(A) States that each LEPC shall prepare and submit a Chemical Emergency Response and Preparedness Plan for the district. This section of law lists the thirteen *minimum* plan requirements that each Plan must address. It also states that the LEPC shall base its plan on information obtained from the Commission (SERC), the Environmental Protection Agency, the Ohio Emergency Management Agency, and political subdivisions within the district (County), and facilities identified under Chapter 3750.04(A)(1).

Ohio Administrative Code, Rule 3750-20-72 States the SERC and each LEPC shall use, at a minimum, the Ohio Hazardous Materials Plan Development and Evaluation Document (Rev. Feb. 2013), for guidance in the preparation of the Plan., as authorized by Chapter 3750 of the Revised Code and as updated and adopted by the SERC.

B. Plan Review and Evaluation:

Ohio Revised Code, Chapter 3750, Section 3750.04 (B) states each LEPC shall annually, (or more frequently if changes in the district, or at any facility in the district, so require), review the Plan of the district to ensure it complies with section 3750.04 (A) of the ORC and the Rules adopted under section 3750.02 (B)(2)(a) & (b) of the ORC and ensure the Plan is *coordinated* with the plans of adjoining districts. It also states the LEPC shall submit the Plan to the SERC annually, not later than October 17th, for review and concurrence.

The Code further states that the SERC shall endeavor to review each Plan within sixty of receipt of the Plan for annual review. The SERC will provide the LEPC notice of concurrence or refusal to concur with the Plan following the SERC meeting the reviewed plan is voted on by the SERC membership. If the Plan is *not concurred with*, the LEPC will be notified that they have sixty days to modify the portions of the Plan that did not meet the minimum requirements and resubmit the Plan to SERC.

Ohio Administrative Code, Rule 3750-20-74(A) states the SERC has designated the OEMA to conduct initial and annual Plan reviews required by section 3750.04(B) of the ORC. The Rule further states the Ohio EMA will utilize the Hazardous Materials Plan Development and Evaluation Document in Plan evaluations and that each Plan submitted shall have a table of contents describing the location of the minimum Plan requirements as identified in 3750.04(A) of the ORC. The rule also requires the OEMA to prepare a report for the SERC listing the Plan review findings and to provide a recommendation for the SERC to concur or refuse to concur with the Plan.

Ohio Revised Code, Chapter 3750, Section 3750.04 (B) states that the SERC shall require that each Plan submitted contain all of the minimum requirements as identified in section 3750.04(A) of the ORC, and the Rules adopted thereunder, for a determination and issuance of an order of concurrence, pursuant to section 3750.18 of the ORC. It also states that if the Plan submitted *does not comply* with minimum requirements, *or* the Plan is not coordinated with the Plans of adjoining districts, the SERC shall issue an Order Refusing to Concur with the Plan. The Order will direct the LEPC to submit a modified Plan that complies with these requirements within *sixty (60) days* after receipt of the order.

Ohio Administrative Code, Rule 3750-20-74(B) states the SERC shall require for issuance of an *Order to Concur* with the Plan that the reviewed Plan shall contain all of the minimum requirements as identified in Section 3750.04 (A) of the ORC and the Rules adopted thereunder.

Ohio Administrative Code, Rule 3750-20-74(C) states the SERC shall issue an *Order Refusing to Concur* with the Plan wherein the Plan did not contain all of the minimum Plan requirements as identified in Section 3750.04 (A) of the ORC and the rules adopted thereunder.

Ohio Administrative Code, Rule 3750-20-74(D) states that upon receipt of an order Refusing to Concur with a plan, the LEPC shall have *sixty days* to submit a modified plan that complies with the requirements set forth in Section 3750.04 of ORC.

- **STANDARD OF CARE:**

A. Definition - The phrase ‘Standard of Care’ refers to a standard by which an item, such as the County’s Chemical Emergency Response and Preparedness Plan, may be measured. A common standard is one in which all like items may be evaluated.

B. Hazardous Materials Emergency Planning Guide (NRT-1) - The National Response Team’s NRT-1 was developed to provide initial national guidance and standards for all the Chemical Emergency Response and Preparedness Plans under the SARA Title III Program. **The SERC has adopted NRT-1 as the Standard of Care for the Plans.**

C. Application:

1. The LEPC’s will utilize NRT-1 as a primary reference and guidance document to comply with ORC Chapter 3750 in preparation of the Plan.

2. Reviews and evaluations of the **County Chemical Emergency Response and Preparedness Plans** will not only include the thirteen requirements of the ORC, but will also include plan elements as addressed in NRT-1.

D. Ohio Hazardous Materials Plan Development and Evaluation Document (OHM-EEM, 12/08) - This document was developed and adopted by the SERC. It follows the guidelines of NRT-1 and Chapter 3750 of the ORC. It identifies all the plan requirements which Shall (must) be addressed in the Plan. It also identifies other essential information which Should be addressed.

E. References - Standard of Care reference material can also be found in FEMA’s Hazardous Materials Public Officials Course, G-300.

IV. INFORMAL REVIEWS:

A. LEPC's are required to submit their Plans for the annual plan review. This is considered a formal review. However, they can request an *Informal Review* of the complete Plan or just sections or proposed revisions to the Plan. This can be done anytime during the year, but prior to the submitting of their Plan for annual formal review.

B. Informal reviews are intended to be a source of help and assistance to the LEPCs. It is an 'off the record' means to have a review done by the Liaison who will be conducting the Annual Review. Comments and recommendations from the informal review go directly to the LEPC. The SERC does not receive any information regarding the informal review.

C. There are no limits to the number of informal reviews an LEPC may request prior to the submission of their Plan for the annual formal review. **The OEMA Field Liaison will conduct informal reviews as their time permits realizing that formal reviews and scheduled exercises have priority.**

D. Informal reviews may be requested no matter if the Plan was concurred with or not. For instance, informal reviews can be requested;

1. Within the 60 day time period of a non-concurrence order, providing the **final** submission is forwarded to OEMA, by the end of that 60 days, for a formal review. This will help ensure the plan requirements are appropriately addressed.
2. Any number of times during the period allotted with an order of concurrence. When submitting materials to the Ohio EMA it is permissible to submit only those areas needing to be reviewed as opposed to the entire Plan.

E. When submitting material or Plans for an informal review, the LEPC ***must*** submit a letter or verbally explain that the LEPC is requesting an "Informal Review" of the material, what planning requirement(s) the enclosed material is addressing, and what sections of the Plan the material replaces (i.e., the section, part, and page number).

F. The Liaison will informally review the materials using the current review documents. The Liaison will fill out only the sections of the review documents that pertain to portions of the Plan covered by the material submitted. The Liaison will list the findings and any pertinent comments or recommendations.

G. Upon completion of an Informal Review, the Liaison will contact the LEPC by telephone, letter, e-mail, or by a personal visit to address the findings and recommendations. This will allow the LEPC the opportunity to correct or update their Plan without going through the formal review procedure.

H. An informal review **does not negate** the requirement for the LEPC to submit their Plan, or Plan updates, for the annual review. All updates, revisions, etc. to the Plan should be held and submitted all at once for the annual formal review.

V. FORMAL REVIEWS:

A. Preparation of the Plan

1. Format - The County's Chemical Emergency Response and Preparedness Plan may be developed either as a 'Stand Alone' Plan or as an Appendix or Annex to the County's Emergency Operations Plan (EOP). (Whenever the Appendix/Annex method is used the *EOP must also be current and updated* as it will be reviewed as part of the Plan).
2. Contents - Prior to submitting the Plan, the LEPC will ensure the Plan meets the requirements of Chapter 3750.04(A), ORC, Rules as adopted, and the Ohio Hazardous Materials Plan Development and Evaluation Document (*Cross Walk*) "Shall" requirements.

B. Before Submitting the Plan - The LEPC must ensure the following items are addressed before submitting the Plan;

1. Coordination with Adjoining Planning Districts. The Plan must be coordinated with the Plans of adjoining Planning Districts (Counties), including those districts across State lines, in accordance with Section 3750.04(B) of the ORC. How this coordination was accomplished needs to be identified in the plan and copies to adjoining LEPC's noted in the distribution list.
2. Table of Contents - Rule 3750-20-74(A)(1) requires each Plan have a Table of Contents describing the location of the minimum plan requirements. The Table should be complete enough to list the major sub-topics in each section. All pages ***must be numbered and dated*** as this will greatly assist the plan holder when posting subsequent changes.
3. Promulgation - The Committee must issue a promulgation statement and a signed copy must be included with each Plan. The Promulgation will identify the Plan as an Official County document. (See Enclosure #1 - Sample Promulgation Document).
4. LEPC Review - A majority of the LEPC members must review the Plan and concur with its contents. A resolution, or some documentation which provides evidence that the Committee approves of the Plan must be submitted with the Plan. For information on conducting internal reviews – see Chapter 6, NRT-1. (See Enclosure #2 - Sample Resolution).

C. Submission of the Plan/Changes for the Formal Review - When submitting the Plan for a formal review the LEPC must submit the following:

1. A letter explaining that the information enclosed, (i.e., new Plan, or Plan updates), is being submitted for the purpose of the formal review. (See Enclosure #3, Sample Letter).
2. A copy of the LEPC's resolution, or other documentation, signed by the Chairperson, indicating that a majority of the LEPC members have read the Plan and/or Plan updates and agrees with the Plan and/or the Plan updates. OEMA will not review a Plan without evidence that the Committee has reviewed the Plan, or Plan changes.

3. Applicable Portions of the Plan to Submit:

- The entire Plan must be submitted for review when the Plan has been completely rewritten. If the Plan is an Annex or Appendix to the County EOP, a copy of the EOP must also be submitted if the EOP was updated, or completely re-written, since the last formal review.
- If the Plan is not an entirely new Plan, only the changes to the Plan need be submitted for the formal review. (See Enclosure #3 - Sample LEPC Letter Requesting Review of the Plan).
- **The HM Plan Development and Evaluation Document must be completed and submitted with the request for review. This would address the requirements under ORC 3750.04 13(a) & (b).**

D. Options for Submission of the Plan - The ORC states that LEPC Plans must be submitted to the SERC (OEMA) for Annual Review *not later than* October 17th of each year. This may be accomplished by:

1. The LEPC completes their internal review of the Plan and then submits the Plan, and/or Plan updates, with a request for a Formal Review, to arrive at the OEMA not later than October 17th each year.
2. The LEPC does not have to wait until October 17th. It may submit its Plan, with all required materials and a letter of explanation to the SERC (OEMA), at any time prior to the October 17th. deadline, (i.e., July 23rd, April 3rd, etc.).

E. Submission of the Plan - The Plan should be mailed to the Ohio Emergency Management Agency's address as shown below. Use of registered mail, with return receipt requested, is recommended.

OHIO EMERGENCY MANAGEMENT AGENCY
ATTN: FIELD OPERATIONS BRANCH
2855 WEST DUBLIN-GRANVILLE ROAD
COLUMBUS, OHIO 43235-2206

F. OEMA Review Process:

1. Upon receipt of the Plan, or Plan changes, and the Formal Review request at the OEMA, it will be date and time stamped. This will start the review process. The Liaison, responsible for your LEPC, will endeavor to review the LEPC's Plan within sixty (60) days or provide the LEPC a reason why this is not possible. Normally reviews are handled on a first in - first served basis.
2. The Liaison will first look for a **resolution** or **other documentation** which provides evidence that the Plan was **reviewed and adopted by a majority of the LEPC**. The Liaison will then notify the LEPC in writing, or verbally, of the receipt of the Plan and/or Plan changes and will note any obvious omissions.
3. Review Techniques/Documents Used by Liaisons.
 - The Liaison will review the cover letter to identify what the LEPC is requesting, i.e., the annual plan review or an informal review. (See Enclosure #3)
 - The Liaison will post any changes to the LEPC's Plan, which is on file at OEMA, and then read the entire Plan for overall content. This allows the Liaison to see if all Plan requirements were addressed. The Liaison will review the LEPC Plan against the Hazardous Materials Plan Review Criteria Form and the Ohio Hazardous Materials Plan Development and Evaluation Document. **The HM Plan Development and Evaluation Document (HMPD & ED) must be completed and submitted with the request for review. This would address the requirement under ORC 3750.04, 13(a) & (b).**
 - During the review, the OEMA Liaison may make comments regarding any Plan omissions, deficiencies, suggestions, and recommendations which will be placed within the county-submitted HMPD & ED. If amended, a copy of the revised document will be sent to the LEPC. Additionally, the LEPC will receive a copy of the SERC review form as outlined in item (e) below.
 - If the Plan is developed as an Annex or Appendix to the County EOP, or, if the Plan references the County EOP, the Liaison is required to check all EOP references. In the event the latest EOP is not on file at OEMA, a copy must be provided by the LEPC. If the EOP is not updated and current, this could negatively affect the Plan review.
 - When the Liaison has completed the review using the Hazardous Materials Plan and Evaluation Document, the Liaison will complete the SERC Hazardous Materials Plan Review Criteria Form. This lists all thirteen minimum plan requirements listed in Section 3750.04 (A) of the ORC.
 - The Liaison will check for evidence that the Plan has been coordinated with adjoining Planning Districts. There are several ways in which the Liaison can assess whether or not the LEPC's Plan has been coordinated with the adjoining districts. These are shown below:

1. The Plan's distribution list indicates that copies of the Plan were provided to all adjoining planning districts, including out-of-state counties.
2. Adjoining districts and their emergency response force telephone numbers are listed in local notification call-down lists.
3. The Plan lists the mutual aid agreements which exist with the adjoining districts response forces.
4. The hazards analysis section shows vulnerability zones that include facilities and vulnerability zones that will affect both planning districts. Also shows facilities in adjoining Districts whose vulnerable zones will impact this LEPC.
5. The Plan describes how coordination has been made between LEPC's regarding the transportation of hazardous materials along routes germane to both LEPC's.
6. The Plan addresses topics which the planning districts share, such as evacuation of areas along common County borders (to include the Ohio River), and how to coordinate movement of people, defining of responsibilities and capabilities based on personnel, training and equipment, etc.

G. No Plan Changes:

1. SERC Letter, "SERC Policy for Annual Plan Review Submission", dated September 8, 1995 states that if the LEPC's Plan has not changed, it is necessary to complete and submit a certified checklist as the LEPC's 'No Change Review'.
2. The LEPC members will conduct their normal annual review of the Plan. Upon completion of the review, finding that no changes are needed, the **LEPC Chair will complete and sign the Checklist and submit it with a letter** stating that no changes have occurred or are necessary as **indicated by Resolution #___** passed by the LEPC. Copies will be sent to the County Commissioners and OEMA.
3. Per SERC Policy, September 8, 1995, the "No Change" procedures can be used **no longer than three (3) consecutive years.** Plans unchanged beyond 4 years will be considered non-current.

H. SERC Notification - The Liaison will complete the Hazardous Material Plan Review Criteria and Executive Summary and send them to SERC with a cover letter recommending the **SERC Concur or Refuse to Concur** with the Formal Review.

I. LEPC Notification - The Liaison will send the LEPC a copy of the material sent to the SERC *and* a letter inviting them to attend the meeting where the SERC will vote on the Review. A copy of the Cross Reference used to evaluate the Plan will be provided to the LEPC at their request.

VI. STATE EMERGENCY RESPONSE COMMISSIONS ACTIONS:

A. SERC Membership Vote - The SERC members will vote to Concur or Refuse to Concur with the Plan's content at the meeting. This will be based on the OEMA Field Liaison review and recommendation of the LEPC's Plan Review. The OEMA Liaisons will attend the SERC meetings in order to answer any questions SERC members have regarding their Plan evaluation and recommendation.

B. Issuance of Orders - There are only two types of orders the SERC will issue;

1. An Order to **Concur** with the Plan. This gives the SERC's approval for the Plan for the current Annual Review and Evaluation period. When the LEPC receives this Order they have until the following October 17th to revise, change and/or update their Plan and request the next Formal review.

2. An Order **Refusing to Concur** with the Plan. This notes that the Plan *did not meet* one or more of the minimum requirements. This will result in the SERC directing the LEPC to submit a modified Plan that complies with all plan requirements in a period not exceeding sixty (60) days after the LEPC's receipt of the order.

3. The orders of concurrence or refusal to concur with a Plan issued by the SERC are effective for the particular planning cycle of October 18th of the year of submission to the next October 17th annual submission date.

C. Refusal to Concur:

1. When the Formal Review reveals that the Plan does not address all the minimum plan requirements, the Liaison that evaluated the Plan, will forward a letter to the SERC recommending the SERC Refuse to Concur with the Plan. A copy of the Hazardous Materials Plan Review Criteria Form will accompany the letter.

2. The Liaison will also forward to the LEPC a copy of the material provided the SERC as well as a copy of the evaluation containing the Liaison's findings and comments and a letter inviting the LEPC to attend the SERC meeting where the Plan Review will be voted on.

3. In accordance with Rule 3750-20-74(C), the Commission shall Refuse to Concur with a Plan that does not contain all the minimum requirements identified in Section 3750.18 of the Revised Code and issue the appropriate order.

4. Upon receipt of the order Refusing to Concur with a Plan, the LEPC shall have **sixty (60) days** to submit a modified plan (to OEMA) that complies with all of the minimum requirements.

5. Grant Funding. If the LEPC's Plan is not concurred with the Plan portion of the SERC's Grant funding will be reduced by one-half.

VII. SUMMARY:

A. This document provides LEPC's a brief summary regarding the preparation and submission of their Plan. It also provides information on the actions which will be taken by SERC and the OEMA acting upon behalf of the SERC.

B. Printing and Distribution of the Plan to all departments, agencies and organizations listed in the Plan is essential if the Plan is to be of value to the community. This should be considered a high priority by the LEPC.

C. If there is any questions or comments please forward them to the address given for mailing in the Plans, or contact your assigned OEMA Field Liaison.

See attached Examples:

- 1 - Sample County Promulgation
- 2 - Sample LEPC Resolution
- 3 - Sample LEPC Letter Requesting Review of Plan
- 4 - No-Change Check List

(EXAMPLE)

(EXAMPLE)

**BUCKEYE COUNTY
LOCAL EMERGENCY PLANNING COMMITTEE (LEPC)**

PROMULGATION

The preservation of life and property is a fundamental responsibility of government at all levels. Chemicals are an essential part of everyday life in Buckeye County. The potential for an incident to occur involving the transport, use, storage and/or manufacture of Hazardous Materials (HM) is ever present. Therefore it is an inescapable function of local government to prevent or lessen the impact of such an incident through emergency planning and preparedness.

This plan, the Buckeye County's Chemical Emergency Response and Preparedness Plan, establishes the roles, procedures and inter-organizational relationships under which county officials, department heads, and private organizations shall operate in the event of any Hazardous Materials incident(s). It is supported by standard operating procedures that address specific HM concepts.

Thus, the Local Emergency Planning Committee (LEPC), nominated by the County Commissioners and appointed by the State Emergency Response Commission (SERC), is charged with the responsibility of preparing, and annually reviewing and exercising the County's Chemical Emergency Response and Preparedness Plan. The plan shall be executed by the Buckeye County Commissioners, the County Emergency Management Agency and those Committees and agencies as designated and described within this plan.

This plan supersedes all other Buckeye County Hazardous Materials Plans, compliments the Buckeye County Emergency Operations Plan, supports the State of Ohio Hazardous Materials Emergency Management Plan, and is coordinated with all neighboring LEPC plans.

This plan is developed in accordance to Ohio Revised Code (ORC) Chapter 3750 and the rules adopted under it, the Superfund Amendments and Reauthorization Act: Title III - Emergency Planning and Right-to-Know Act of 1986 (100 Stat. 1729, 42 USCA 11001), and other applicable local, state and/or federal laws.

This plan is acknowledged and adopted on the ____ day of _____, 200_ by:

_____ County Commissioner, President

_____ County Commissioner

_____ County Commissioner

_____ County LEPC Chairman

ENCL 1

(SAMPLE RESOLUTION)

BUCKEYE COUNTY LOCAL EMERGENCY PLANNING COMMITTEE

RESOLUTION NO 20-__

1. WHEREAS, the Buckeye County Local Emergency Planning Committee has completed the required documentation for Buckeye County's Chemical Emergency Response and Preparedness Plan in accordance with NRT-1 and subsequent guidance; and,
2. WHEREAS, the State Emergency Response Commission has directed the various County Local Emergency Planning Committees to forward the County's Plan directly to the Ohio Emergency Management Agency for all Reviews; and,
3. WHEREAS, a majority of this Committee has reviewed and does concur with the Plan (or Plan Revisions) as it is written; and,

NOW THEREFORE, be it RESOLVED that the Buckeye County Local Emergency Planning Committee hereby submits the County's Chemical Emergency Response and Preparedness Plan for an Annual Review by the State Emergency Response Commission and with the concurrence of a majority of the Committee.

RECORD OF MOTION:

FOR: _____
AGAINST: _____
ABSTAINING: _____

I hereby certify this resolution was approved by a majority of the Buckeye County Local Emergency Planning Committee members present at the meeting of this ___ day of _____, 200_.

_____, _____, LEPC Chairman
(Signature) (Printed Name)

ENCL 2

(EXAMPLE)

(EXAMPLE)

**BUCKEYE COUNTY
LOCAL EMERGENCY PLANNING COMMITTEE
200 WEST MAIN STREET
YOURTOWN, OHIO 03030**

October 8, 200__

Ohio Emergency Management Agency
ATTN: Field Operations Branch
2855 West Dublin-Granville Road
Columbus, Ohio 43235-2206

SUBJECT: Request for a Review of the County Chemical Emergency Response and Preparedness Plan

The Chemical Emergency Response and Preparedness Plan for Buckeye County is hereby forwarded to the State Emergency Response Commission for the Annual Plan (*or an Informal*) Review and Evaluation.

The Plan is enclosed and, in the opinion of a majority of the Committee, meets the criteria of current laws and rules and the guidance provided by SERC.

*******or for changes only*******

The Buckeye County LEPC herewith forwards the attached Plan revisions to OEMA for Annual Review and Evaluation.

The materials enclosed constitute all changes and update material(s) for the Plan currently on file at OEMA.

Changes. Please post the following pages to the existing Plan prior to conducting the annual review.

<u>Remove</u>	<u>Insert or Add</u>
1-6	1-8
A-2,5,6&9	A-2,5,6,6a,9&10
G-Entire Section	New Section G
N-1-4	N1-4a
	Add Map Sheets 9 &10

Please direct any questions to the following individuals: Ms. Mary Planner, office (484) 595-5959 or Mr. John Firehouse, office (484) 596-9595.

__ Enclosures:

**JOHN J. WESTERLAND, CHAIRMAN
BUCKEYE COUNTY LEPC**

ENCL 3

COUNTY LEPC PLAN
“NO CHANGE REVIEW” CHECKLIST

For the period of October 18, _____ to October 17, _____

Annually, the LEPC must ensure the following (paraphrased) thirteen planning requirements are accurate and current within their Chemical Emergency Response and Preparedness Plan. (Refer to ORC 3750.04(A) for the detailed wording of each requirement.) As the LEPC conducts its annual plan review, the appropriate LEPC representative must initial on the line provided and verify that the indicated plan requirement is adequately addressed and no changes in the plan are necessary.

PLEASE NOTE: As per SERC policy issued on September 8, 1995, “The ‘No Change’ procedures can be used no longer than three (3) consecutive years, whereupon plan changes...must be used to change the plan or update it to maintain a current status. Plans unchanged beyond 4 years will be considered non-current.” Exceptions to this policy will not be made.

<u>ORC 3750.04(A) Plan Requirements</u>	<u>Initials</u>	<u>Date</u>
(1) An identification of each EHS Facility within the district;	_____	_____
(2) An identification of facilities that add to or are subject to additional risk;	_____	_____
(3) An identification of routes to and from each EHS Facility;	_____	_____
(4) Response procedures used by facility, response and medical personnel;	_____	_____
(5) The designation of facility coordinators, the community emergency coordinator, and the heads of local response organizations;	_____	_____
(6) Procedures for reliable, effective, and timely notification and communications;	_____	_____
(7) Methods for determining release occurrence and impact areas;	_____	_____
(8) A composite statement of resources;	_____	_____
(9) Development of evacuation plans;	_____	_____
(10) Development of mutual aid plans;	_____	_____
(11) Development of training and education programs;	_____	_____
(12) The methods and schedules to exercise the plan;	_____	_____
(13) SERC’s defined requirements: The plan has a Table of Contents; The LEPC used the Plan Development guide; The plan is coordinated with adjoining Districts.	_____	_____

As the LEPC Chairman, I hereby certify that a majority of the LEPC members have reviewed the Plan against the above criteria and we have found that no revisions or updates are necessary for the plan evaluation period ending this October 17,

A resolution, or other support documentation, which provides evidence that the Committee approves of the No-Change Review is attached.

Date: _____

signed: _____
 LEPC Chairman

cc: County Commissioner

CHAPTER TWO

EXERCISING THE PLAN

I. INTRODUCTION

A. General - Section 3750.04 (C) of the Ohio Revised Code (ORC) requires each Local Emergency Planning Committee (LEPC) to conduct an exercise of its Chemical Emergency Response and Preparedness Plan, hereafter called 'the Plan', **at least annually**. It also states that the LEPC shall notify the Commission **at least thirty days** before each such exercise and a representative of the Commission shall observe each such exercise.

B. Purpose - The purpose of this Chapter is to: provide the LEPC, and its appointed Exercise Design Team, an easy to read document for planning and conducting the LEPC's exercises of the Plan, explain procedures to follow, and provide definitions of the law and rules which apply to the exercises.

C. Exercising - This Chapter provides the methods for: testing and validating emergency plans and procedures, for determining the readiness of emergency responders, identifying the training needs, and for resolving questions of coordination, roles and responsibilities. It also promotes awareness of potential chemical hazards within the District.

D. Reference - Ohio's Hazardous Materials Exercise Evaluation Manual (OHM-EEM) (12/09). The SERC has approved the use of this document as the official exercise document for Ohio's Chemical Emergency Response and Preparedness Plans.

E. Scope - Areas addressed herein are as follows:

1. **Authority** - A quick review of the laws and rules as they apply to Hazardous Materials Exercises under ORC Section 3750.04 and OAC Rules.
2. **References** - A listing of the primary references that should be used when developing the exercises.
3. **The Exercise Development Process** - A description of the exercise process that can be used to meet annual exercise requirements.
4. **The Exercise Evaluation Process** - Information on the evaluation process including actions required by the LEPC, the Facilitator and the SERC.
5. **Post Exercise Responsibilities** - Describes what the LEPC needs to do following the exercise, such as critiques and the need to develop a corrective action program.
6. **Other Information** - Explanation of how to claim exercise credit for actual incidents, and combining LEPC exercise requirements with those of the County EMA.
7. **Conclusion** - A summary of several points regarding exercises and their uses and value to the overall planning process.

II. AUTHORITY

The following paragraphs summarize the exercise requirements as written in Chapter 3750 of the Ohio Revised Code and the Ohio Administrative Code Rules.

1. Ohio Revised Code, Section 3750.04(A)(12) – The LEPC Chemical Emergency Response and Preparedness Plans shall contain the methods and schedules for exercising the County’s Plan.
2. Ohio Revised Code, Section 3750.02(B)(2)(b) - The SERC shall adopt rules to establish criteria and procedures for exercising, reviewing and providing concurrence or requesting modifications of the LEPC’s Plan.
3. Ohio Revised Code, Section 3750.04(C) - The LEPC’s Plan shall be exercised at least annually.
4. Ohio Administrative Code (OAC), Rules 3750-20-70, 76 through 84 address exercise requirements as follows. These rules are currently under revision, and the following reflects the changes already approved by the SERC.
 - Rule 3750-20-70 lists exercise definitions, i.e., Actual Event; (*Core Objectives have been deleted*); Primary Emergency Operations Center (EOC); Alternate EOC; Exercise Objective; Operational Capability and Points of Review.
 - Rule 3750-20-76 describes the types of exercises, i.e., Table Top, Functional, Full-Scale or actual hazardous materials incident credit requirements.
 - Rule 3750-20-78 explains the execution of exercises, i.e., the four year exercise cycle; one full scale exercise; activation of *an (no longer requires primary)* EOC; requirement to use the OHM-EEM; **only two actual incidents** may be claimed in **one exercise cycle**; and what types of chemicals may be used in an exercise.
 - Rule 3750-20-80 describes the review of exercises: The Ohio Emergency Management Agency’s role; requirement for a Corrective Action Plan by the LEPC; and actual incident exercise credit qualifications.
 - Rule 3750-20-82 describes when SERC will issue an Order to Concur; and issuance of a SERC Order Refusing to Concur.
 - Rule 3750-20-84 describes the public review process, i.e., Full-Scale exercises must be critiqued and discussed at an announced (publicized) Public meeting.

III. REFERENCES

A. The Ohio Hazardous Materials Exercise and Evaluation Manual (**OHM-EEM, Dec. 08**) is designated as *the official exercise evaluation document*. Ohio's LEPC's are to use this document to develop and conduct their hazardous materials exercises. The SERC appointed Facilitators, and the LEPC's chosen evaluators, will follow the guidance contained in the OHM-EEM when facilitating and evaluating the exercises.

B. NRT's "Developing a Hazardous Materials Exercise Program" (NRT-2, Sep 90), this manual provides guidance for the development and execution of chemical exercises.

C. FEMA's "Exercise Design Course" (SM 120.01, Aug 95) and "Guide to Emergency Management Exercise" (SM #120.02, Oct 97) is conducted by the OEMA staff. LEPC's can request the course through their County EMA Office.

D. FEMA's Hazardous Materials Workshop in Emergency Management, #305.4 entitled "Exercising Emergency Plans Under Title III", (Feb 91), is a program which provides an instructors guide and student handbooks and is intended for a 'local, qualified' instructor to present the course. Course information and materials are available through the County EMA at no cost to the County.

IV. THE EXERCISE DEVELOPMENT PROCESS

A. Pre-Exercise LEPC Activities and Responsibilities:

1. General - When deciding to design and conduct their Annual Exercise, the LEPC must consider that **By Law:**

- The LEPC shall conduct an exercise of its Plan at least annually.
- The LEPC must notify the SERC using the LEPC Exercise Notices. See Tab C, OHM-EEM), for the required Sixty (60) & Thirty (30) day notices. *Failure to submit a completed exercise notice can result in the exercise not being facilitated for credit.*
- The Committee must involve in each exercise, in addition to local emergency response and medical personnel, either a facility that is subject to the Plan or a transporter of a regulated chemical cargo governed by the 'Hazardous Materials Transportation Act'. For facilities, chemicals used in exercises can be any chemical on site as regulated by OSHA. **A Facility subject to the Plan:** *A facility that is regulated by SARA Title III.*
- The SERC has adopted a four year exercise cycle. The exercise year is defined as July 1 to June 30 to coincide with the State Fiscal Year.
- The LEPC must exercise all thirteen objectives identified in the OHM-EEM successfully at least once within the four year exercise cycle.
- Conduct a minimum of one Full-Scale exercise (3750-20-78(B)) and **an** EOC must be fully activated and evaluated within each exercise cycle (3750-20-78(C)).

- During the exercise, a majority of the Points of Review of each selected objective must be adequately demonstrated and thus each objective being exercised is considered **met** in order to receive SERC's concurrence.
- Full Scale exercises require the LEPC schedule, and publicly announce, a public critique following the exercise. (Recommend selecting a date and time, informing the Media, Facilitator and Evaluators and participants prior to the exercise).

2. Types of Exercises - The LEPC will conduct an evaluated exercise using one of the following types of exercises. Each exercise must demonstrate a specific number of OHM-EEM exercise objectives as shown below.

- **Table Top Exercises** - Table Top Exercises are used to exercise selected portions of the Plan *without* using field or functional demonstrations. These exercises permit elected officials, department or agency representatives to gather together to discuss planned response to various simulated emergency situations. The exercise will be designed to elicit constructive discussion by the participants.
- *The Table Top exercise shall demonstrate at least three but not more than five objectives.*
- **Functional** - A Functional Exercise is an activity designed to test or evaluate the ***operational capability*** of an individual or multiple functions, i.e., the actual operation of the EOC, an Incident Command System, public information, etc. The deployment of personnel and equipment is used to demonstrate the function being evaluated. This type of exercise is utilized where a response activity is capable of being evaluated in isolation from other emergency management activities and is designed to fully test those functions. An EOC or Command is activated and used to demonstrate the use of command structure.
- *The functional exercise shall physically demonstrate at least four and not more than seven objectives.*
- **Full-Scale** - A Full Scale Exercise is intended to evaluate the ***operational capability*** of the overall emergency management systems in an interactive manner. The full scale exercise involves testing a majority of the functions of the Plan. This exercise requires actual field play that includes mobilization and actual deployment of emergency personnel and resources that demonstrate coordination and response capabilities. An EOC **or** Command Post shall be activated to coordinate operational field capabilities.
- *The full scale exercise shall physically demonstrate eight or more objectives.*

3. Exercise Considerations - The LEPC must consider several factors when deciding on the type, scope and size of their exercise. LEPC's should consider the following within their planning district:

- What is the nature and extent of risks posed by hazardous materials at fixed facilities, and/or along transportation corridors? How should an exercise be organized to test the response to an emergency situation involving those materials?
- What are the existing capabilities and limitations of the various emergency response agencies, departments and organizations within the LEPC's jurisdiction? For example, emergency response organizations, County EMA and other County Agencies, responder training, availability of hazmat equipment, Decon and Hazmat Teams, American Red Cross, etc.
- What is the availability of these organizations, departments and agencies to participate in an exercise? Has the Committee provided information to them on the LEPC's exercise program?
- What types of exercises has the LEPC and other organizations conducted in the past? What sections of the Plan do the LEPC and emergency response community need to test?
- Location. Which areas of the District have been involved in past exercises? Has the LEPC considered conducting the exercises in different locations to permit other emergency response organizations and departments to participate?
- To what extent can the LEPC test its Plan while minimizing the impact on the county response organizations to deliver normal and routine services?
- Can an exercise include the test of other emergency plans and SOPs, i.e., hospital, airports, emergency response organizations, chemical facilities, schools, adjoining County Plans, etc.?

4. Appointment of a Exercise Design Team:

- The LEPC should appoint an Exercise Design Team to develop the hazardous materials exercise for the district. The Team should be appointed six to eight months prior to the intended date of the exercise.
- The Team can consist of LEPC members and non-LEPC members that represent organizations, departments, agencies, facilities, etc., which will be participating in the exercise. **However, they cannot be players in the exercise itself.**
- The Team must have a Team Leader who will be responsible for organizing and controlling the efforts of the Team and rendering regular progress reports to the Committee.

NOTE: Exercise Design Team members *will not* be players in the exercise as they designed the exercise and understand how it was intended to work. Instead, they can and should work as *Exercise Controllers*.

- The Team has the responsibility to take the LEPC's exercise guidance and then design, conduct and control the exercise. The Team Leader should include the designated OEMA Field Liaison in the initial or subsequent exercise meetings. The Liaison can assist the Team and provide them guidance.

5. Exercise Design Team Responsibilities:

- Following the LEPC's exercise guidance, choose the type and scope of the exercise, i.e., a table-top, functional or full-scale. Choose which of the fourteen OHM-EEM Exercise Objectives are to be exercised.
- Develop a realistic scenario involving a facility subject to the plan or a transportation incident involving the chemical cargo load. Consider what chemical(s) should be used for the exercise, the sequence of events, the exercise timeline and expected actions by the participants for each exercise objective to be evaluated.
- Determine what, if any, parts of the exercise are to be *simulated*. The Team should realize that only those functions not being evaluated or not directly affecting the evaluation may be simulated. Simulations should be held to a minimum in functional and full scale exercises.
- Identify the emergency response and support groups to be exercised. Contact the local/county responders, medical personnel and support groups to obtain their participation and assistance.
- Identify which, if any, communication systems will be utilized. Consider all available normal resources, to include amateur communications personnel and equipment.
- Contact a regulated facility (subject to the Plan) or hazardous materials transporter, and request their participation in the exercise. The Team will need to provide them information on the exercise, to include date, time and location and what their involvement would be in the exercise. Invite their representative to be on the Exercise Design Team.

6. The Incident Scene:

- The scene *should be realistic* to add realism to the exercise. The Team should attempt to secure the resources necessary to make the scene appear as the scenario states. If the incident is a chemical tanker and car accident with chemical release, then the Team should ensure that is what the emergency responders see and find as they make their response.
- The site for the incident must be carefully selected. The Team members need to view the site and consider:
 - ✓ If there is sufficient space to permit realistic deployment of the emergency response organizations expected to participate in the exercise.
 - ✓ If the area can be secured from non-participating personnel, would traffic in the area be a problem, can it be controlled, etc.
 - ✓ Can the Team get approval to utilize the site from whoever owns or is in charge of the site.
 - ✓ The need to keep non-participants off the scene and out of the emergency responders way.
 - Observers, mutual aid departments and others need to *be staged away from the incident site* as not to interfere with the emergency responders approach, assessment, and reaction to the incident scene.

B. Joint Exercise - If this is to be a joint exercise, exercising other emergency plans and/or with other jurisdictions, ensure that a representative of the participating agencies, departments, facilities, hospitals, and organizations are included in the exercise planning.

C. Public Notification -

1. The public should be notified in advance that the LEPC will be conducting their annual hazardous materials exercise, especially if the exercise is functional or full scale and involves field play. On the day of the exercise, the notice should be repeated and additional information be provided such as the location of the exercise, to expect increased traffic, etc.
2. If the LEPC conducts a Full Scale exercise, there *must be a public critique*. This can be scheduled separately from the critique normally held for the participants following the exercise. If the LEPC is claiming an actual incident for full scale exercise credit a public critique must still be scheduled.

D. Other Considerations:

1. The LEPC can, and should, provide the participants *general* information about the exercise such as objectives to be exercised, the date of the exercise, participating organizations, etc. This will allow them to notify personnel, review SOPs, and prepare for the event. However detailed information on the exercise should not be provided as this will take away from the players normal reactions.
2. The LEPC can provide the participating fire department some limited equipment and supply items to assist with the exercise. For example, a green flashing light, or green flag to properly mark the IC Post, a set of identification vests (i.e., IC, Safety, Staging, PIO) and supplies to replace those used during the exercise.
3. The Team should establish exercise ground and safety rules and brief all participants on how the exercise is to be conducted and how it will be terminated in the event of a real emergency. For example, one exercise rule should be that all exercise messages and transmissions will contain the words '**This is an Exercise**' at the start and finish of each message or transmission.
4. When large exercises are planned and organizations involved are unfamiliar with hazardous materials response operations, there is an excellent opportunity for the LEPC to help the participating organizations prepare by arranging briefings, training or table-top exercises prior to the actual exercise.
5. The Design Team must arrange for the administrative and logistical support needed for the exercise, i.e., secretarial support, equipment needed to create the incident scene (such as trucks, tankers), smoke bombs, barricades, radios for the Controllers, etc.

V. THE EXERCISE EVALUATION PROCESS

A. General - The following paragraphs describe the evaluation process and the duties and responsibilities of the LEPC, Evaluators and Facilitators.

B. LEPC Exercise Notice:

1. In accordance with the exercise rules, the LEPC must notify OEMA of the LEPC's intent to conduct an annual exercise. The LEPC Exercise Notice, (Found in Tab C, OHM-EEM), must be completed and mailed to OEMA a minimum of **60 days prior to the exercise date**. *Per direction on Notice Form, Initial Information 60 day, Final Information 30 day.*
2. Evaluators are selected by the LEPC and must be identified on the 30 day notice form. It is preferable to have an evaluator evaluate only one objective, however, no more than two is recommended. In this case it is recommended that the objectives be similar in nature and be demonstrated at one location. An evaluator must be trained, experienced, and capable of evaluating all the objectives assigned.
3. Upon receipt of the "**Notice**" the Field Liaison assigned to that section of the State will review the Notice to ensure it is complete and notify the LEPC that it has been received. The Liaison will be the SERC's point of contact for the exercise and will offer the Team advice and assistance as needed in developing the exercise. This Liaison is normally the SERC Facilitator for the exercise.

4. The Exercise Design Team Leader must keep the OEMA Field Liaison advised of any changes to the announced exercise plans, dates, scenario, or evaluators as they occur.

C. Exercise Evaluators:

1. It is the responsibility of the LEPC to *select its own Evaluators*. It is essential that the Exercise Design Team *select individuals who are knowledgeable* in the area(s) they are being asked to evaluate.
2. SERC Resolution #96-159, dated August 14, 1996, states that **“each Committee is to select evaluators who are knowledgeable in the areas they are to evaluate” and that the evaluators “shall be provided, by the exercising LEPC, the portion(s) of the plan and/or SOPs that relate to the exercise objectives that they are to evaluate.”** For example, someone not trained in decon or Hazmat operations should not evaluate response personnel safety.
3. Evaluators may be selected from adjoining counties, *non-participating* local response and medical agencies, from the private sector or State or other governmental agencies, but not OEMA.
4. Evaluators are not permitted to be players in the actual exercise.
5. Evaluators should not be Committee members of your LEPC, or members of the Exercise Design Team.
6. Individuals who are members of the SERC cannot serve as Evaluators.
7. Evaluators selected must receive Evaluator Training provided by the SERC Facilitator prior to the exercise. The time and place for this training will be coordinated with the designated SERC Facilitator not later than one week prior to the date of the exercise.
8. For the exercise, the LEPC’s shall provide the Evaluators material to help them do their evaluation, such as copies of the sections of the Plan they are going to evaluate, clipboards, radios, pens, etc. Also, the OHM-EEM contains guidance for each point of review per objective. Evaluators are encouraged to review these forms prior to the day of the exercise.
9. The Evaluator’s comments and observations are the basis of the Facilitator’s report. The exercise participants and community leaders need to be apprised of the exercise findings. Evaluators must be objective and constructive in their comments.

D. Exercise Objectives - Description and Use:

(Reference OHM-EEM, 12/08)

1. Exercise Objectives. There are thirteen (13) objectives identified in the OHM-EEM. Tab A of the OHM-EEM provides a description of each Objective and its subsequent Points of Review. Consult Tab A during the initial exercise design phase to help select which Objectives can/should be tested each year.
2. Exercise Evaluation Forms.
 - There is an Exercise Evaluation Form for each of the thirteen objectives. On each form there is *Points of Review* (questions) pertaining to the Objective. These questions are designed to evaluate the response and are collectively used to observe the demonstration of the specific objectives during the exercise. Tab B of the OHM-EEM contains the actual evaluation forms.
 - The Points are Yes/No questions, or can be NA if not pertinent. The forms are designed with a couple blank lines under each question to provide the evaluators space in which to write their observations. The following is an example of a Point of Review:

Were patients adequately decontaminated before being treated? Yes No n/a

- As noted in the example above: For each Point of Review the evaluators have three choices to mark their decision as to whether or not the Point was adequately demonstrated. These are:
 - YES** - means that this Point was adequately demonstrated, i.e., the evaluator actually saw the Point being demonstrated, heard it demonstrated or could tell from viewing records (logs) that it was demonstrated.
 - NO** - means the Point was not adequately demonstrated during the exercise. The evaluator did not observe it being demonstrated and there was nothing to show the Point had been demonstrated.
 - N/A** - Not Applicable, means that due to the design of the exercise scenario that Point of Review could not be evaluated, was not applicable to the exercise being conducted, or was not applicable to the exercise itself.
- Some Points observed may require the evaluator to make inquiries of the responders to ascertain if the Point was completed or not. The evaluator *should not* drop hints or attempt to assist the players. There may be reasons why the Point was not accomplished which can be discovered in the briefing or critique. During the critique, the Evaluator should point out those areas which were well demonstrated and those which may require additional work or training.

E. SERC Appointed Facilitator:

1. By Law, (3750.04(C) the SERC must observe each LEPC exercise. The Facilitator serves as the official representative of the Commission. The SERC has directed OEMA (Rule 3750-20-80) to provide Facilitators for the exercises. The Facilitators are responsible to:

- Receive and review of the LEPC's Exercise Notice.
- Coordinate with the LEPC's Exercise Design Team during the development stage of the exercise to insure they understand the OHM-EEM and the requirements of the ORC and Rules.
- Assist with the review of the exercise scenario and the plans for the conduct of the exercise. The Facilitator can do this by attending exercise planning meetings and offering advice and guidance as needed.
- Train the LEPC's selected evaluators prior to the exercise. The Exercise Team must ensure the evaluators have been provided a copy of the portion(s) of the plan they are to evaluate **prior** to the training session (Resolution # 96-159). The Facilitator will inform evaluators of their duties and responsibilities before, during and after the exercise.
- Observe the conduct of the exercise, coordinate the actions of the evaluators, arrange for the conduct of critiques by the evaluators, and provide Facilitator comments, as appropriate.

2. The Facilitator will write the exercise report utilizing information from the Exercise Evaluation Forms, as completed by the evaluators, and make a recommendation to the SERC for Concurrence or Non-Concurrence.

F. Execution of the Exercise - Duties and Responsibilities:

1. Exercise Day -

- On the day of the exercise the Controllers, Evaluators and the Facilitator need to meet early enough to discuss any last minute exercise changes and to ensure the Evaluators know their locations and have all their materials to evaluate the exercise.
- The Facilitator will pre-position Evaluators as necessary to evaluate the exercise, i.e., in the EOC, at the incident scene, at the media center or at other predetermined locations. Evaluators should position themselves where they can observe the actions of the players without getting in the way and/or disturbing the responder's efforts to react to the requirements of the exercise. The Evaluators must be proactive and be aware of all actions taken so that proper credit can be given.

- Equipment to be used, and personnel participating in the exercise, can be pre-positioned. However, if the scenario calls for initial *notification* and actual response by the response agencies, then the personnel and equipment should not be pre-positioned. In any event, the time of arrival of these agencies at the scene should not be less than the amount of time an actual response would take. Lights and sirens normally are not used going to the exercise site but ought to be turned on once on site to create the proper atmosphere.
- Controllers should brief the Heads of each participating agency on the safety and ground rules, the objectives, and provide instructions regarding any planned simulations which will be used during the exercise, i.e., personnel safety such as heat exhaustion, role of controllers, evaluators, etc.
- If not accomplished in a pre-exercise meeting, the players will be informed of last minute changes, the Objectives being exercised and instructions as to what can and cannot be simulated by the participants during the exercise. Response actions should be as realistic as possible to permit the players to get the best training possible from the exercise.

2. Control of the Exercise - On exercise day, the Exercise Design Team should assume the duties of Controllers. The Controllers should:

- Establish exercise ground rules, safety rules and other matters pertinent to the exercise, announce these to the participants prior to the start of the exercise.
- Present the players with exercise initiating narrative and/or messages to start the exercise at the designated start time.
- Deliver pre-scripted and/or spontaneous messages to players to evoke player reactions and control the flow and pace of the exercise by introducing the remaining events in sequence through the use of control messages or input cards. Keep the exercise on schedule and terminate it on time.

NOTE: Ideally, the exercise should progress naturally and allow response actions to be completed as responders deem appropriate. Some prompting by the Controllers may be necessary if play bogs down or an Objective is not being adequately tested. Inputs should not 'lead the players by the hand'. Any unplanned input should be debriefed at the end of the exercise so that the players understand the reason it was made.

VI. POST EXERCISE RESPONSIBILITIES

The following paragraphs address responsibilities and actions following the exercise.

A. Evaluator's Responsibilities:

1. Complete the OHM-EEM exercise evaluation forms and provide their written comments to the Facilitator before leaving the exercise area.
2. Participate in the exercise critique. The evaluators will be asked to critique the objectives they were evaluating to participants immediately following the exercise. Their critique should not address every point but summarize, unless there is a specific issue which requires comment. They should remark on which *actions were done well and address those areas which, in their opinion, need further attention and/or training*. They should be prepared to answer questions from the participants during their critique.
3. If the exercise was a full scale exercise, and the critique was scheduled for a later time and date, the evaluators should also be present for the public critique,

B. LEPC Members and Elected Officials should:

1. Attend the exercise critique in order to hear the comments of the Evaluators, Facilitator and the Players.
2. Schedule and attend the Public Meeting which is required to be held following a Full Scale Exercise. This meeting could be held at a regularly scheduled LEPC meeting or at a special public meeting in accordance with Section 121.22, ORC.
 - The meeting should cover such items as the reason for the exercise, the scenario, and a critique of all portions of the exercise.
 - The LEPC should host the formal public meeting with the SERC Facilitator, supported by the Evaluators, conducting an open forum critique and discussion with all of the players and public on the exercise.
3. Following the exercise and the critique, work quickly to address needed plan revisions, corrective action(s) and various deficiencies and/or shortcomings noted during the exercise. The best time to accomplish corrective actions is right after an exercise while everyone remembers the problems.
4. Review the comments of the Facilitator, Evaluators, Players, Exercise Design Team and others and discuss what necessary changes to the plan should be made.
5. Start planning for next year's exercise. The LEPC should build on the objectives and experiences of this year's exercise and attempt to improve on the good areas while correcting the poor areas.

NOTE: In the event that an objective was identified as ‘**Not Met**’ the Facilitator would direct the LEPC to complete a *Corrective Action Plan (CAP)*. The LEPC would be given sixty days to review the exercise report, identify how to resolve the concerns, and submit the CAP to the Facilitator. (See paragraph 4, page 2.16 of the OHM-EEM, May 99).

C. Ohio Emergency Management Agency’s Facilitator will:

1. Collect the exercise information and evaluation documents from the Evaluators immediately following the exercise and review the evaluators written observations to ensure the forms are complete and understandable. The Facilitator will use this information to write the official report. The Facilitator will request the evaluators take part in the exercise critique.

2. The Facilitator will take part in the exercise debriefing/critique, normally by stating the purpose for the exercise, covering what objectives were evaluated, introducing the evaluators and requesting that they discuss the objective(s) they were assigned.

3. The Facilitator will prepare the official exercise report for the LEPC and SERC and make a recommendation to either Concur with the exercise or require the LEPC to develop a Corrective Action Plan.

- The report will be based upon the direct observation, comments of the Evaluators reports, Facilitators notes, and Responder’s logs.
- The report shall include but not be limited to the following:

- ✓ Comments regarding the date, time and location of the exercise and a description of the exercise scenario.
- ✓ Identification of Exercise Evaluators and the Facilitator.
- ✓ Report on the findings of each of the exercise objectives’ Points of Review with comments on any Point evaluated as Not Met or Not Applicable.
- ✓ Corrective Action Recommendations for each Point of review listed as Not Met or Not Applicable, per Objective.
- ✓ Provide, in the final section of the report, overall comments and recommendations for the benefit of the SERC and the LEPC.

4. In accordance with the October 1998 rule changes to OAC Rules 3750-20-80(C) and (D) and 3750-20-82(B)(1)&(2) the Facilitator will take the following actions:

- If all objectives were met, the Facilitator will develop the exercise report, with appropriate remarks, and recommend the SERC Concur with the exercise.
- If one or more of the exercise objectives were evaluated as Not Met then the Facilitator would develop the report with appropriate recommendations and send it to the LEPC directing them to complete a Corrective Action Plan (CAP) within sixty days.

- Upon receipt of the LEPC's CAP, the Facilitator would review the LEPC's recommendations and determine if they will adequately resolve the Points of Review considered to be Not Met. If the Facilitator determines the LEPC has taken, or has identified actions which will be taken, to correct the unmet Points of Review the Facilitator will recommend the SERC Concur with the exercise. If not, the Facilitator will forward the CAP, the Executive Summary and the exercise report to SERC recommending non-concurrence.
- A Majority of the points of review for an Objective must be successfully demonstrated for a point to be considered Met. A Not Applicable (N/A) point is still considered a point of review.

D. The State Emergency Response Commission (SERC) will:

1. Review and discuss the exercise report. If the Facilitator's recommendation is for Non-Concurrence the SERC may have the Facilitator explain the reasons.
2. The SERC will then pass a Resolution either to Concur or Refuse to Concur with the conduct of the exercise.
3. An order either Concurring with the Conduct of the Exercise or Refusing to Concur with the Conduct of the Exercise will then be forwarded to the LEPC.

E. Concurrence, Corrective Action Plan and Non-Concurrence:

1. Concurrence -

- Upon receipt of a Concurrence Letter from SERC, the LEPC will have officially completed its annual exercise requirement.
- However, the LEPC should not consider the exercise complete until all of the corrective actions and recommendations, written in the Facilitator's exercise report, have been reviewed and corrective actions are taken.

2. Corrective Action Plan -

- If an Evaluator determines that an exercise has not adequately demonstrated a *majority* of the Points of Review within **any one** of the selected exercise objectives, the Exercise Facilitator will submit the exercise report, with a cover letter, requiring the LEPC prepare a Corrective Action Plan.
- The LEPC shall have sixty days, from the date of the notification letter, to submit a Corrective Action Plan to the Ohio Emergency Management Agency. The Corrective Action Plan shall address actions taken, or to be taken, to correct the 'Not Met' Points of Review within those Exercise Objectives identified in the exercise report as not adequately demonstrated.

- The LEPC shall develop the Corrective Action Plan and forward it to OEMA for review. Upon completion of this review, the Corrective Action Plan, along with an Executive Summary and the exercise report will be submitted to SERC for consideration.
- The SERC shall issue an Order of Concurrence if the LEPC's Corrective Action Plan was submitted within sixty days of the date of the notification letter and sets forth actions taken, or to be taken, to correct unmet Points of Review within those Exercise Objectives identified in the exercise report as not adequately demonstrated.

3. Non Concurrence - The SERC will issue an Order Refusing to Concur with the exercise if the Corrective Action Plan is not submitted within sixty days or it does not set forth action taken, or to be taken, to correct unmet Points of Review within the Exercise Objectives identified in the exercise report as not adequately demonstrated.

NOTE: If a non-concurrence order is given for an exercise, the LEPC will lose one half of its exercise funding for the year and will not be eligible for the LEPC Recognition Award.

VII. OTHER INFORMATION

A. Actual Incidents:

1. If an actual incident is to be used as an annual exercise of the plan, it must adhere to the requirements established for the type exercise selected.

2. In accordance with exercise rules, an actual response to a fixed facility subject to the Plan or a chemical cargo in transport can qualify as an annual exercise. The LEPC must submit to OEMA the LEPC Exercise Notice, along with a written summary of the incident in lieu of an exercise scenario, **within thirty days** following the actual date of the release and indicate what type exercise and which objectives the LEPC wants to claim for exercise credit.

Note: Rule 3750-20-78 (G) states: No more than **two** actual incidents may be used as an exercise during **each four-year** exercise cycle.

3. The LEPC designated OEMA Field Liaison will then arrange to meet and interview the appropriate LEPC, EMA, and Response officials and review the various message logs, newspaper articles and other materials from the incident and discuss the response to the incident to determine what credit can be granted.

4. The OEMA Liaison/SERC Facilitator will write the exercise report, to include the Evaluator's and Facilitator's recommendations, and forward it to SERC for their actions. All the previously mentioned procedures for Concurrence and Refusal to Concur are the same for actual events.

B. Combining the LEPC Exercises With Other Exercises:

1. The County EMA and the LEPC may wish to combine a County EMA Exercise, or Area Plan exercise, with the LEPC's annual hazardous materials exercise. However, all of the SERC's exercise rules and requirements must still be met.
2. If the LEPC and County EMA wish to combine their exercises and have any questions, they should contact their assigned OEMA Field Liaison.

VIII. CONCLUSION

A. An exercise can be a powerful stimulus for building interest in developing a comprehensive local emergency plan. Emergency preparedness is a continual process with three internal functions: planning, training, and exercising. Each function is dependent upon the other and should not be viewed in isolation.

B. Once a plan is developed, there must be periodic tests and checks for its accuracy. The procedures stated in the plan, the activities of the various organizations described in the plan, the actions of the other County agencies and organizations must be correctly portrayed. It is the LEPC's responsibility to insure the plan is tested annually.

C. Upon completion of an exercise, the LEPC needs to assess the results of the exercise to identify plan and resource strengths and weaknesses and assess the adequacy of training programs and the need for additional training. LEPC's should encourage facilities to cooperate in the process as it too can benefit their operations and at the same time boost their image.

D. Exercises should be moved around the District to involve different response organizations and facilities and to build countywide coordinated response capabilities.

E. A successful exercise forces people to take an honest look at the District's capabilities and limitations and leads the involved agencies, departments and organizations to make changes needed to improve emergency response.

F. Forward all questions on this document, or the exercise process, to the following address, or call OEMA (614) 889-7180 or one of the Field Liaisons.

Ohio Emergency Management Agency
ATTN: Field Operations Branch
2855 West Dublin Granville Road
Columbus, Ohio 43235-2206