

OFF-SITE RESPONSE PLAN

City of Philadelphia

The enclosed Off-Site Response Plan has been developed by the Local Emergency Planning Committee for the Emergency Planning District of City of Philadelphia in accordance with the provisions of the Superfund Amendment and Reauthorization Act of 1986 (SARA) Title III, the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), and of the Hazardous Material Emergency Planning and Response Act, Pennsylvania Act 1990-165. It has been written in conjunction with the emergency planners at the facility and represents the cooperative efforts of both the community and industrial planners in response to a hazardous material emergency at the facility. This plan was last approved by the Philadelphia Local Emergency Planning Committee on

The plan was last reviewed by SERC on

Dave Binder, Chairperson
Local Emergency Planning Committee
City of Philadelphia

This plan includes the following enclosures:

- I. Site Specific Planning Information
- II. Hazardous Materials Vulnerability Analysis
- III. Facility Equipment and Resources
- IV. Emergency Release Notification Requirements
- V. Evacuation and Alternate Traffic Routes
- VI. Vulnerability Zone(s) (to be completed by OEM)
- VII. Critical Infrastructure and Community Resource (to be completed by OEM)
- VIII. Facility Site Plan

OFF-SITE RESPONSE PLAN

Philadelphia HAZARDOUS MATERIAL OFF-SITE RESPONSE PLAN

I. PURPOSE

The purpose of this plan is to describe procedures and establish responsibilities for community planning and response to a hazardous material (HazMat) emergency at the above-named facility. This plan is in accordance with the requirements under Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA), the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), and of the Hazardous Material Emergency Planning and Response Act (Act 1990-165) of the Commonwealth of Pennsylvania.

II. GENERAL INFORMATION

A. Facility Information

manufactures, stores, or uses extremely hazardous substances (EHS) as listed in Enclosure II. Vulnerability radii were calculated using the 2024 Emergency Response Guidebook (ERG).

B. Summary of Hazardous Materials Vulnerability Analysis

See Enclosure II for Hazardous Materials Vulnerability Analysis.

C. Emergency Notification - FACILITY RESPONSIBILITIES

The Facility Coordinator should immediately notify:

911 (also serves as notification to PLEPC)

Pennsylvania Emergency Management Agency (PEMA)
(800) 424-7362 OR (717) 651-2001

National Response Center (if required) **(800) 424-8802**

D. Emergency Notification - COUNTY RESPONSIBILITIES

Notify the following parties as outlined in the Hazardous Materials Response Plan.

City of Philadelphia's Executive Staff

City Department Leadership Staff, as needed

Surrounding county EMA, as needed

PEMA Area Office

State and Federal agencies, as needed

D. Emergency Procedures

Emergency response procedures for the City of Philadelphia are outlined in the City's Hazardous Materials Response Plan.

E. Protective Actions

Evacuation is sometimes, but not always necessary. When considering evacuation versus sheltering, the following criteria should be reviewed.

1. Quantity of release
2. Additional risk facilities
3. Distance from release
4. Effectiveness of precautionary measures
5. Duration of release
6. Potential for outbreak of fire
7. Health hazards
8. Property vulnerability
9. Type of release
10. Wind direction
11. Sheltering factor of facility
12. Sheltering factor of threatened site
13. Availability of special transportation
14. Area of municipality affected
15. Weather

Evacuation and/or shelter-in-place decisions will be made at the discretion of the Incident Commander under the National Incident Management System (NIMS) Incident Command System (ICS).

F. List of Additional institutions/sites at risk

See Enclosure VII for additional institutions/sites at risk.

G. List of Shipping Routes for SARA Substances

See Enclosure I for shipping routes.

H. Description of Facility's Method to Determine Occurrence of a Release

See Enclosure II for method to determine occurrence of a Release.

III. ORGANIZATION AND RESPONSIBILITIES

A. Assignment of Responsibilities

1. The *City of Philadelphia's Office of Emergency Management* is designated as the lead county agency responsible for coordinating the development, execution, and management of programs and functions of the LEPC.
2. *City Leadership* (See City of Philadelphia's Hazardous Materials Response Plan)
3. *Local Emergency Planning Committee* (Act 1990-165)
 - a. During an emergency, LEPC members who are members of emergency response organizations will respond according to their organization's responsibilities (e.g. fire, police, etc.).
 - b. After the emergency (or exercise), the LEPC should discuss the activities conducted during the emergency with a view toward improving response planning.
4. *Facility*
 - a. During an emergency, the facility must **make the required notifications**.
 - b. **Take appropriate actions within their capability to stop or contain the release** of hazardous materials and provide for the protection of their employees.
 1. Meet the first responders and brief them on the situation.
 2. Ensure contact information for facility representative is available at the command post to provide technical assistance and information.
 3. Provide for clean-up of the contaminated area.
 - c. Provide a **listing of facility resources** (Enclosure III)
 - d. After the emergency period is over, and if the release was a reportable quantity that extended beyond the facility boundary, the facility owner/operator will submit a written report within 14 calendar days of the release to PEMA and to the City Office of Emergency Management, in accordance with Section 206(d), Pennsylvania Act 1990 - 165.
5. *Incident Commander* (See City of Philadelphia's Hazardous Materials Response Plan).
6. *Fire Representative* (See City of Philadelphia's Hazardous Materials Response Plan).
7. *Police Representative* (See City of Philadelphia's Hazardous Materials Response Plan).
8. *Emergency Medical Services* (See City of Philadelphia's Hazardous Materials Response Plan).
9. *Public Information Spokesperson* (See City of Philadelphia's Hazardous Materials Response Plan).
10. *All other local, state, and federal agencies* (See City of Philadelphia's Hazardous Materials Response Plan).

IV. TRAINING AND EXERCISES

A. Training

Training programs and training schedules for emergency response and medical personnel are maintained at City of Philadelphia Office of Emergency Management.

B. Exercises

Exercise schedules are maintained at the City of Philadelphia Office of Emergency Management.

V. PLAN DEVELOPMENT AND MAINTENANCE

The LEPC will review and update this plan annually. Notice of review/ copies of changes will be provided to PEMA.

ENCLOSURES:

- I. Site Specific Planning Information
- II. Hazardous Materials Vulnerability Analysis
- III. Facility Equipment and Resources
- IV. Emergency Release Notification Requirements
- V. Evacuation and Alternate Traffic Routes
- VI. Vulnerability Zone(s) (to be completed by OEM)
- VII. Critical Infrastructure and Community Resource (to be completed by OEM)
- VIII. Facility Site Plan

DISTRIBUTION:

PEMA Area Office
PA Department of Labor and Industry (PATTS)
PLEPC - lepc@phila.gov

**ENCLOSURE I
SITE SPECIFIC PLANNING
INFORMATION**

Facility Information

Facility Name:
Facility Street Address:
Facility City: Philadelphia
Facility State: Pennsylvania
Facility Zip Code:

Facility Phone Number:
Facility 24-Hour Number:

Facility Latitude:
Facility Longitude:
NAICS Code:
Type of Business:

EHS Ingress/ Egress Routes

Rail
Road
Other

Facility Emergency Coordinator (FEC)

FEC Name:
FEC Office Phone:
FEC 24-Hour Phone:

Alternate Facility Contacts:

Alternate FEC Name:
Alternate FEC Office Phone:
Alternate FEC 24-Hour Phone:

Plant/Facility Manager Name:
Plant/ Facility Manager Office Phone:
Plant/ Facility Manager 24-Hour Phone:

Facility Owner Name:
Facility Owner Office Phone:
Facility Owner 24-Hour Phone:

Employee Information

Staff on-site (Y/N)

First Shift Schedule: to

Number of Employees On-Site (First Shift):

Second Shift Schedule: to

Check if no second shift.

Number of Employees On-Site (Second Shift):

Third Shift Schedule: to

Check if no third shift.

Number of Employees On-Site (Third Shift):

What is your facility's process for determining head count at your site?

Who is responsible for the roster of on-site staff?

Role:

Name:

Office Phone:

Cell Phone:

Does your facility have a designated rally point(s)?

If yes, please describe:

Please describe your policy related to shelter-in-place, evacuation, and other protective actions.

ENCLOSURE II HAZARD VULNERABILITY ANALYSIS

Current Facility Tier II Report

(Insert as separate attachment with your emailed submission to lepc@phila.gov)

Monitoring and Early Warning

Select all the methods that your facility has in place to detect an EHS release has occurred.

Sensor-based detection

Visual observation

Alarm systems

Employee reporting

Other

Describe the methods your facility has in place to detect that an EHS release has occurred.

Protective Actions

Describe the methods used by your facility to determine who will be affected by a release (ie, modeling, site-specific risk assessments, other analyses).

Describe your facility's process for internal alerts and warnings.

Describe any capacity for public alert and warning within your facility and how this capability would be activated in the event of a release.

Licenses/ Plan

All Tier II sites must have one of these plan types. Please select yes to one of the below.

Does your facility have an Emergency Action Plan in conformance with OSHA 29 CFR 1910.38?

Learn more about OSHA 29 CFR 1910.38 here: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.38>

Does your facility have an Emergency Response Plan in conformation with OSHA 29 CFR 1910.120 (q)?

Learn more about OSHA 29 CFR 1910.120 (q) here: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.120>

Does your facility have an integrated Contingency Plan or ICP (a.k.a. "one plan") as outlined by the National Response Team's guidance?

Learn more about the National Response Team's ICP here: <https://www.osha.gov/laws-regs/federalregister/1996-06-05-0>

**ENCLOSURE III
FACILITY EQUIPMENT AND RESOURCES**

A. Technical Experts (at least one REQUIRED)

Name: _____ Available on-site (Y/N)

Position Description:

Name:

Position Description:

Name:

Position Description:

B. Resource Availability

Please outline the resources you have available to support response efforts.

Fire Suppression

Outline any fire suppression personnel or equipment (i.e., internal fire brigade, foam, dry powder).

Medical/ First Aid

Outline any medical or first aid personnel or equipment.

Other Response Resources

Please outline any additional resources available, i.e., heavy machinery, etc.

Clean-Up Contractor

Does your facility have an existing clean-up provider under contract?

If yes, please share name and contact information:

C. Communication and Coordination

List the communication and coordination resources your facility would utilize in an emergency.

Does your facility use portable radios?

Are additional radios available for use by first responders?

Does your facility have fixed cameras or other surveillance resources?

If yes, please describe.

Does your facility have a designated incident command post?

If yes, please describe.

**ENCLOSURE IV
EMERGENCY RELEASE NOTIFICATION REQUIREMENTS**

Per EPCRA, section 304, the following information is to be relayed when reporting the release of a reportable quantity (RQ) of an extremely hazardous substance (EHS):

Immediate Notification

1. Chemical Name
2. Indication of EHS
3. Estimated quantity of release
4. Time and duration of release
5. Disposition of release (air, water, and/or land)
6. Known or anticipated health effects (both acute and chronic)
7. Precautions to be taken
8. Contact information for Facility Emergency Coordinator or other facility personnel who can provide additional information

Written Follow-up Notification

1. Updated information provided in initial release notification
2. Actions taken to respond to and mitigate release
3. If appropriate, information on medical attention necessary for those exposed to release

**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY
HAZARDOUS MATERIAL EMERGENCY NOTIFICATION REPORT**

This report has been prepared by or on behalf of the below-named company or individual in order to provide emergency notification information about a hazardous material release that occurred from a facility or vehicle that is either owned or operated by the named company or individual. Submissions of this report is required by Section 304 of the Emergency Planning and Community Right-to-Know Act of 1986 (SARA Title 111) (42 U.S.C. Section 110004 [7c]) and Section 206 (d) of the Hazardous Material Emergency Planning and Response Act (35 P.S. Section 6022.206[d]).

ENCLOSURE V
EVACUATION AND ALTERNATE TRAFFIC ROUTES

Evacuation decisions will be at the discretion of the Incident Commander. Evacuation routes will correspond to those outlined in the evacuation plans maintained by the City of Philadelphia.

Facility Evacuation Plan

Describe your facility's evacuation plan. Please include evacuation procedures including chain of command, evacuation routes, and assembly points, communications plan, and a process for accounting for employees after evacuation.

Outline any alternate traffic routes to access your facility.

REQUIRED: Insert a copy of your evacuation plan and/or an evacuation map with your emailed submission.

ENCLOSURE VI
VULNERABILITY ZONES
(Completed by OEM)

The PLEPC uses the 2024 Emergency Response Guidebook (ERG) to determine primary and secondary vulnerability zones based on your facility's EHS information. The primary and secondary vulnerability zones are defined as the isolation distance in all directions for the largest container of the most hazardous chemical on-site.

Facility Primary Vulnerability Zone (miles):

Facility Secondary Vulnerability Zone (miles):

[OEM TO INSERT VULNERABILITY ZONE MAP]

ENCLOSURE VII
CRITICAL INFRASTRUCTURE AND COMMUNITY RESOURCES
(Completed by OEM)

A. Facilities at Risk for Release

Facilities in each category located within the primary vulnerability zone radius* of the facility.

Schools:

Childcare/Day Care Centers:

Hospitals/Healthcare Facilities:

Nursing Homes/ LTC Facilities:

Dialysis Facilities:

Community/Recreation Centers:

B. Facilities Posing Additional Risk to Facility

Facilities within the primary vulnerability zone radius of the facility's EHS that contribute additional risk to the facility, including other SARA facilities.

Facilities:

Utility Companies:

Note: The facilities within the primary vulnerability zone radius might not be the only facilities affected by a chemical release (the effects could impact facilities outside of the radius). The radius is not meant to be used as the sole guide for potential downwind impact. Impacts might vary significantly from the guide and the guide is not meant to deal with individual situations. It is recommended that persons seek expert advice on any particular situation.

**ENCLOSURE VIII
FACILITY SITE PLAN**

Please submit a site plan for your facility, clearly marking the storage locations of EHS. Include as an attachment by selecting View - Comment - Annotations - Attach file OR include as an attachment with your emailed submission.

PLEASE CERTIFY THE INFORMATION BY SIGNING AND DATING BELOW. THE PLAN WILL BE REVIEWED BY THE LEPC.

Your Name:

Your Title:

Your Signature:

Date: