ANNEX Q – HAZARDOUS MATERIALS INCIDENT RESPONSE
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PURPOSE

This annex establishes the policies and procedures under which Baylor University will operate in the event that an incident involving a hazardous occurs. The magnitude and specifics of each incident are evaluated and appropriate procedures and protocols described in this annex are carried out. It defines the roles, responsibilities and organizational relationships of the University and all other agencies and private entities in responding to and recovering from a hazardous material related incident.

SITUATION AND ASSUMPTIONS

SITUATION OVERVIEW

1. The University is a multi-employer worksite with much of the day to day tasks accomplished by outside vendors and contractors. Being a multi-employer worksite requires that all entities working within the confines of the campus on a regular basis have designated key employees trained and involved with the hazardous material response plan. Total commitment by all working on campus is essential for appropriate response if a hazardous material incident were to take place.

2. Major construction projects are a regular part of the University’s landscape. These construction projects also fall under the multi-employer worksite venue with collaboration necessary with those contractors to ensure compliance with all hazardous material related standards and regulations. Each large project has a dedicated general contractor who serves as a liaison between the University and the sub-contractors on the job. Total commitment by all working on these significant construction projects is essential for appropriate response if a hazardous material incident were to take place.

3. A hazardous material is any item or agent (biological, chemical, physical) which has the potential to cause harm to humans, animals, or the environment, either by it or through interaction with other factors. The
University has designated locations on campus where materials of this nature are being utilized and/or stored by trained faculty and staff.

4. Regular training and exercising this annex will be performed as needed and involvement of all departments critical to the success of a response to a hazardous materials incident will be included with all University planning and training.

5. An incident that can be identified as dealing with a hazardous material may occur in numerous locations that the University is responsible for or located in a close proximity to. Identification and isolation of a hazardous material incident is an integral part of the initial response process.

6. Although radiological materials are considered hazardous materials in most classification schemes, detailed planning for incidents involving these materials are covered in Annex D, Radiological Protection, to this plan.

7. When the Baylor Police dispatch is notified of a possible hazardous material incident, the agencies and departments below will be contacted for assistance with initial response as determined necessary for response, identification of potential hazard(s), consultation, mitigation, and recovery:

   - Baylor University Police Department
   - City of Waco Fire Department
   - City of Waco Police Department
   - Baylor Environmental Health and Safety Department
   - City of Waco Emergency Medical Response
   - University-hired contractor(s) as identified
   - Hazardous material clean-up vendor

The Baylor University Police Department highest level of command on duty at the time of the incident will instruct Baylor Police dispatch as to whom to contact for immediate response.

8. Emergency worker protection standards provide that personnel may not participate in the response to a Hazmat incident unless they have been properly trained and are equipped with appropriate personal protective equipment. Minimum training requirements for Baylor personnel responding to these types of incidents will be Hazmat awareness training.

**PLANNING ASSUMPTIONS**

1. An incident involving exposure to a release of a hazardous material(s) could pose a threat to the University population, facilities, and/or environment. These types of incidents may be caused by or occur during another emergency such as a major fire or a severe weather event.

2. Hazard assessments will be conducted involving hazardous materials and all possible exposures that can affect the University. These assessments are living documents and will be reviewed annually to update and verify previous information gathered and include newly identified areas meeting set criteria.

3. Information included in the hazard assessments conducted for Annex Q will be utilized to create and design training classes, table-top exercises, and real time scenario response drills.

4. All mutual aid partners will be included in the planning and carrying out of table-top exercise and real time scenario response drills.

5. All training conducted, table top exercises, and real time scenario response drills will have post evaluation meetings with designated and participating entities to evaluate and continue to improve the University planning efforts.
CONCEPT OF OPERATIONS

OVERVIEW

The provisions of this annex, in compliance with the National Incident Management System (NIMS) operating principles and protocols constitute general guidance designated for agencies, departments and individuals engaged in activities to mitigate the effects of and/or prevent the occurrence of a hazardous substance spill.

PREVENTION

Hazardous material incident/exposure prevention activities include:

- A chemical hazard analysis is routinely performed to identify the types and quantities of hazardous materials present at the University or a schedule as determined by local, state, and federal requirements coordinated through the Baylor Emergency Manager’s office.
- University faculty, staff, and contractors will work with the Emergency Manager at designated times to give updates on hazardous chemical inventories, chemical strength mitigation strategies, hazard assessment updates, and all other pertinent information necessary to create a proactive safety culture when dealing with hazardous chemicals/substances.
- The designated University faculty/staff, City of Waco Fire Department, and/or the Environmental Health and Safety Department, and third party University-hired contractors will performs periodic inspections of facilities/locations that produce, use, or store hazardous materials.

PREPAREDNESS

Develop and conduct training programs on chemical hazards and related protective actions.

Designated University faculty, staff and third party contractors will continually prepare for possible scenarios that may occur by:

- Knowing what types of chemicals/compressed gases are being utilized in their area on campus or jobsite;
- Evaluating all chemicals/compressed gases to attempt the utilization of the safest concentration available to achieve the desired results;
- Storing all chemicals/compressed gases per regulatory requirements;
- Ensuring appropriate personal protective equipment is available and utilized per the most recent Safety Data Sheet when any task(s) involving chemicals/compressed gases are being carried out; and
- Making sure everyone involved with or near the location of a potentially hazardous situation, or where one is going to be staged, knows what they would need to do in the event their safety and/or health is at risk.

All stakeholders who have involvement with this annex will meet periodically to discuss, revise and update this information as needed.
Based on the information received by Baylor Police dispatch from the initial and/or subsequent calls prior to a Baylor University Police response unit arriving on scene, additional outside resources and key Baylor designated staff will be notified of the possible situation that has been reported. Additional resources can always be turned around if, after Baylor University Police and designated Baylor staff arrive and begin assessing the scene, it is determined what and if additional resources are needed.

Proactive training pertaining to decision making by all Baylor departments involved in emergency response is a key component to having an effective and timely response to any incident requiring that type of attention.

RESPONSE ACTIVITIES

The initial Baylor designated trained response staff arriving at the location of the reported possible incident will initiate the following:

- Assess the scene quickly without exposing themselves to any possible hazardous/dangerous situation.
- Give Baylor Police dispatch an initial report of observations.
- If a situation of concern exists and/or any question as to what is/has taken place remains, isolate and secure the scene from any contact by those in the area while awaiting additional response personnel and resources to arrive.
- If the initial response units with training and authority believe the incident warrants an Incident Command Post be set-up, make that decision and initiate the process.
- Relay concise information is to Baylor Police dispatch during the entire process to ensure time frames and data being generated on scene are captured.
- Depending on the size and magnitude of the situation, make decisions pertaining to additional necessary actions to be taken (Unified Command, Emergency Operation Center activation, Notifications, etc.).

The Baylor Emergency Management Plan is written to address an ALL-HAZARD format. Per the National Incident Management System the All-Hazard approach ensures consistency in response to any and all type of situations of any size that may take place. Having comprehensive and effective working relationships with all emergency response and University stakeholders is critical to the success that will be consistently achieved through this response protocol process.
RECOVERY

When the initial response to an incident has ended, further effort may be required to control access to areas, which are still contaminated, clean up and dispose of spilled materials, and decontaminate and restore areas, which have been affected. The recovery process may continue for an extended period.

The size and magnitude of the incident will dictate how much of the emergency plan needs to be ongoing. Designated roles of responsibility per the command structure created by Incident Command or the Emergency Operations Center if activated will coordinate these efforts until completed to the satisfaction of the University and any other concerned entity or agency.

ORGANIZATION OF ASSIGNMENT AND RESPONSIBILITIES

GENERAL

Our normal emergency organization’s All Hazard format, described in the Basic Plan, will be employed to respond to and recover from incident(s) involving hazardous materials.

ASSIGNMENT OF RESPONSIBILITIES

Reporting Protocol for Faculty/Staff/Student/Third Party Contractor

- Isolate incident if possible.
- Evacuate the area if necessary.
- Notify the Baylor University Police Department and give specific details of what the incident involves. Depending on the information received the magnitude of the response may be immediately escalated.
- Notify the Baylor Sciences Building director and/or designee for instructions if a situation exist or is created within the Baylor Sciences Building.
- Follow all instructions received.

Baylor University Police Department (BUPD)

- Baylor dispatch will get all specifics possible concerning the incident involving a hazardous material from the reporting party.
- Dispatch will send Baylor University Police Department unit(s) to the scene.
- Depending on the information received from the initial call, outside emergency response agencies may be activated to begin moving towards the scene of the incident. Outside department/agency responders can always be notified to cancel, but it is better to have them on the way than to delay further their arrival by waiting to activate those resources.
- Baylor University Police Department will arrive on scene and begin evaluation based upon information given by dispatch, observations of the site and interviews conducted.
- The Baylor University Police Department will get dispatch to notify Environmental Health and Safety personnel for technical assistance.
- Necessary resources will be summoned and necessary Baylor University need-to-know individuals will be notified and/or activated per protocol.
• Appropriate evacuation protocol will be determined and carried out by identified resources.
• The initial Incident Command post for the Baylor University Police Department will be established if deemed appropriate.
• The Baylor University Police Department will work with necessary resources to ensure a timely and effective response establishing a unified command post if the size of the event necessitates that action.
• Dispatch will be the initial scribe for the incident depending on its size and the type of response necessary.

Environmental Health and Safety (EHS)

• Maintain up-to-date emergency contact roster for the director and staff;
• Provide technical assistance as requested and respond to the scene for further evaluation and mitigation strategy planning;
• Identify location(s) which are University property and/or areas in close proximity to campus that have the probability of producing or logistically hosting a hazardous material(s) event;
• Ensure University compliance so that immediate safety data sheets are readily available; and
• Train faculty/staff/students on appropriate emergency procedures if an incident involving a hazardous material were to take place.

Local, State, and Federal Response

• These entities will follow their established standard operating procedure response criteria working with the immediate needs communicated from the designated University representatives.

Third Party Contractors

• Specific needs will be addressed by third party entities contacted by University representatives to mitigate an identified incident through mutual aid and/or contractual agreements.

DIRECTION AND CONTROL

GENERAL

The magnitude, location, and specifics pertaining to any response to a hazardous material incident will dictate the direction and control that all responding agencies tasked with mitigating the situation will take.

SPECIFIC

Each hazardous material response incident is unique. Data that are utilized by the responding departments/agencies/contractors need to be accurate to the best of the ability of the University technical representatives. The practice of ongoing pre-planning, training, and chemical inventory data collection, location, and quantity control are all specific areas that are critical to carrying out a successful program and efficient response if ever necessary.
ADMINISTRATION AND SUPPORT

POST INCIDENT REVIEW

Following any response requiring a review by Baylor University Police Department and/or outside departments and agencies to a hazardous material(s) incident or release, a post event meeting will be held by the Emergency Manager identifying designated staff/faculty/response agencies/third party contractors to review what transpired during the event. The “good,” “fair,” and “in need of attention” items will be identified and discussed. The Emergency Manager in conjunction with Environmental Health and Safety and Baylor Sciences Building staff will access the information received at the meeting and form a mitigation strategy, make the necessary assignments to work on any identified items needing attention and follow-up appropriately to ensure that all necessary progress has been made.

TRAINING

See the Baylor University Emergency Management Plan.

PLAN TESTING AND CORRECTION

Departmental and interdepartmental drills, tabletop exercises, functional exercises, or full-scale exercises dealing with hazardous material(s) incidents shall be scheduled. Appropriate stakeholders will be included in the coordination of the planning and training involving University hazardous material(s) response.

Non-University Stakeholders

- Local and regional fire departments
- Local and state law enforcement
- State and federal agencies
- University-contracted third party contractors
- Any additional agencies and/or contractors as deemed necessary

This annex should be corrected and revised, if required, based on the results of exercise critiques.

ANNEX DEVELOPMENT AND MAINTENANCE

- The Department of Environmental Health and Safety is responsible for developing and maintaining this annex. Recommended changes to this annex will be forwarded to the director of emergency management as needs become apparent.
- This annex will be reviewed and updated in accordance with the schedule outlined in Baylor University Emergency Management Plan.

REFERENCES

- National Response Team, Hazardous Material Emergency Planning Guide (NRT-1)
- US Department of Transportation, Emergency Response Guidebook
FEDERAL

- Public Law 96-510, Comprehensive Environmental Response Compensation and Liability Act of 1980
- Public Law 99-499, Emergency Planning and Community Right to Know Act of 1986
- 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response
- 40 CFR 68, Clean Air Act
- 40 CFR 261, Resource Conservation and Recovery Act

STATE

- Texas Health and Safety Code, Chapter 502, Texas Hazard Communication Act
- Texas Health and Safety Code, Chapter 506, Public Employer Community Right-to-Know Act
- Texas Health and Safety Code, Chapter 507, Non-manufacturing Facilities Community Right-to-Know Act

SUPPORT DOCUMENTS

Support Document A: Protective Actions for Campus Constituents
Support Document B: Items in Excess of Listed Reportable Quantity
SUPPORT DOCUMENT A: PROTECTIVE ACTIONS FOR CAMPUS CONSTITUENTS

Factors to Consider in Selecting Protective Actions

Among the factors to be considered in determining protective actions for the public are the following:

- Characteristics of the hazardous material
- Degree of health hazard
- Amount of material that has been released or is expected to be released
- Time of release
- Rate of spread
- Weather conditions, particularly wind direction and speed for airborne hazards
- Population at risk
  - Location
  - Number
    - Special-needs facilities or populations
- Evacuation routes
- Estimated warning and evacuation times
- Ability to predict behavior of Hazmat release.

Primary Protective Strategies

The two primary protective strategies used during Hazmat incidents are shelter in place and evacuation.

Shelter in place involves having people shelter in a building and take steps to reduce the infiltration of contaminated outside air. Shelter in place can protect people for limited periods by using the shielding provided by a building’s structure to decrease the amount or concentration of Hazmat to which they are exposed. With a continuous release, the indoor concentration of Hazmat for buildings within the Hazmat plume will eventually equal the average outdoor concentration, limiting the effectiveness of this strategy in long-term releases.

Evacuation protects people by relocating them from an area of known danger or potential risk to a safer area or a place where the risk to health and safety is considered acceptable. While evacuation can be very effective in protecting the public, large-scale evacuation can be difficult to manage, time consuming, and resource intensive.

Shelter in place and evacuation are not mutually exclusive protective strategies. Each strategy may be appropriate for different geographic areas at risk in the same incident. For example, residents within a mile downwind of an incident site may be advised to shelter in place because there is insufficient time to evacuate them, while residents of areas further downwind may be advised to evacuate.

Shelter in place may be appropriate when:

- Public education on shelter in place techniques has been conducted.
- Sufficient buildings are available in the potential impact area to shelter the population at risk.
- In the initial stages of an incident, when the area of impact is uncertain.
- A Hazmat release is impacting or will shortly impact the area of concern.
A Hazmat release is short term (instantaneous or puff release) and wind is moving vapor cloud rapidly downwind.

Evacuation routes are unusable due to weather or damage or because they pass through a likely Hazmat impact area.

Specialized equipment and personnel needed to evacuate institutions such as schools, nursing homes, and jails are not available.

Evacuation may be appropriate when:

- A Hazmat release threatens the area of concern but has not yet reached it.
- A Hazmat release is uncontrolled or likely to be long term.
- There is adequate time to warn and instruct the public and to carry out an evacuation.
- Suitable evacuation routes are available and open to traffic.
- Adequate transportation is available or can be provided within the time available.
- Specialized equipment and personnel needed to evacuate institutions are available.
- The Hazmat released is or will be deposited on the ground or structures and remain a persistent hazard.
- The likely impact area includes a large outdoor population, and there are insufficient structures for sheltering that population.

Other Protection Strategies

Protection of Water Systems. A Hazmat incident may contaminate ground water supplies and water treatment and distribution systems. If water supplies are affected, the public must be warned and advised of appropriate protective actions; alternative sources of water will have to be provided.

Protection of Sewer Systems. A hazardous chemical entering the sanitary sewer system can cause damage to a sewage treatment plant. If systems are damaged, the public must be warned and advised what to do. It will likely be necessary to provide portable toilets in affected areas.

Relocation. Some hazardous material incidents may contaminate the soil or water of an area and pose a chronic threat to people living there. People may need to move out of the area for a substantial period of time until the area is decontaminated or until natural weathering or decay reduces the hazard.

Disseminating Warning and Protective Action Recommendations

The normal means of warning the public of emergencies, described in Annex A of this plan, will be used to warn the public of Hazmat incidents.
SUPPORT DOCUMENT B: ITEMS IN EXCESS OF LISTED REPORTABLE QUANTITY

As part of the Environmental Management System, all items in excess of its listed reportable quantities based off the current Tier 2 Report is listed below.

- Diesel fuels - emergency backup generators
- Gasoline
- Hydraulic fluid
- Lead metal
- Liquid nitrogen
- Sulfuric acid
- Transformer oil