OHIO HAZARDOUS MATERIALS EXERCISE AND EVALUATION MANUAL
For use beginning FY22

SECTION I - INTRODUCTION

A Purpose

In 1990, Ohio and its Local Emergency Planning Committees (LEPCs) began testing their plans. The State Emergency Response Commission (SERC) recognized the need to develop a manual that explains the program to local officials. In late 1992, the first Ohio Hazardous Materials Exercise and Evaluation Manual (OHM-EEM) was distributed. The OHM-EEM provides LEPCs guidance for the planning, execution and evaluation of the required annual hazardous materials exercises. As per Ohio law, the SERC must re-evaluate its rules every five years. In 2008 2019, the SERC's Operations and Issues Committee completed its five-year review of the exercise and planning rules. This manual has been revised to reflect the changes made to the exercise rules.

This manual is designed to assist the LEPC in understanding the unique requirements under which the Chemical Emergency Response and Preparedness Plan (the Plan) is exercised.

- The Introduction outlines the LEPC exercise requirements as laid out in Ohio law and the rules established by the SERC. It also briefly addresses how to design, conduct, and evaluate a LEPC exercise.
- It will also identify some techniques that the LEPC may use or consider when developing the exercise. The manual then addresses how the LEPC can use an actual incident for credit for an exercise.
- It will then discuss how LEPCs can complete an exercise with another LEPC or the State.
- Tabs A and B will outline and discuss the Objectives each LEPC will exercise throughout the exercise cycle; Tab C defines how to schedule the exercise with SERC.
- For more specific information on how to develop and conduct an exercise, the LEPC should review various sources of exercise training and guidance (Tabs D-H).

These tools should permit the LEPC to develop an exercise, which will adequately test and evaluate the Plan. The exercise should identify and eliminate planning and procedural problems, as well as, highlight successes. The Federal Emergency Management Agency's (FEMA) *Exercise Design* course notes that there are two benefits to an exercise program. The first is training. Personnel get a chance to practice hands-on with equipment and learn to effectively implement their procedures. They can identify where additional training is needed or what additional resources may be required. The second benefit is the improvement to the overall planning process. The exercise lets various agencies interact and learn more about their respective roles in chemical incidents. The exercise will generate input from a variety of personnel to eliminate duplication of effort or how to improve response coordination. The exercise should validate a hazard analysis that was completed for an incident scenario. The two benefits can only be realized if the LEPC designs and conducts an effective exercise, and uses the results to improve the local program.

This manual has been adopted to help meet those goals. Therefore, it is the State's official exercise development and evaluation guide for Ohio's LEPCs.

B Exercise Laws, Rules, and Policies in Review

Ohio law requires local communities to annually exercise their plan. It further requires the SERC to develop exercise rules that identify requirements that LEPCs must address when developing and conducting a chemical exercise. This section summarizes the contents of Ohio law as well as SERC's rules and exercise policies.

1 Ohio Revised Code (ORC). Chapter **3750**, entitled **Emergency Planning**, includes provisions for the annual exercising of the LEPC's plan. The following are excerpts from the ORC. These requirements were established when the original law was passed in 1988.

a ORC 3750.04(A) (12). Section .04(A) outlines what information must be included in each LEPC Plan. Item (A) (12) notes that the Plan shall contain "...the methods and schedules for exercising the plan." This means that the Plan shall summarize *how* the LEPC develops an exercise and *when* it plans to conduct its annual exercise.

LEPCs were issued planning guidance that requires that the Plan *shall* describe the frequency or identify the schedule used to exercise during the four-year exercise cycle. This guidance also notes that the plan *should* provide a summary of the exercise types and describe how actual events may be used. It *should* also outline how the exercise will be critiqued and how those results will be used to improve the emergency management program. Planning requirements are discussed and outlined in the SERC's Ohio *Hazardous Materials Plan Development and Evaluation Guidance Document*. The LEPC should verify they are using the most current document adopted by SERC. (June 1995).

b ORC 3750.04(C). Section .04(C) states that the LEPC shall conduct an exercise of its Plan annually. The section requires the LEPC to provide notification to the SERC before conducting exercise. Notification is required because the SERC must observe each LEPC exercise. Finally, the section notes that the SERC will either issue an Order to Concur or Refuse to Concur with the exercise based on the Evaluators' findings and the report submitted by the Facilitator.

c ORC 3750.02(B) (2) (b). Section .02(B) (2) states that the SERC shall adopt rules to implement and administer the SERC/LEPC program. Item (B) (2) (b) directs the SERC to establish criteria and procedures for exercising. This includes how the SERC will review and provide concurrence for an exercise. It allows the SERC to request the LEPC to modify their plan and exercise program based on observations made during the event. This section of the law requires that each exercise include the participation of local First Response personnel. The exercise shall include either a facility subject to the Plan <u>or</u> a transporter of hazardous materials. SERC's rules are published in the Ohio Administrative Code (OAC).

d ORC 3750.05(A). Section (A) states that upon written request by the LEPC, the SERC may designate an additional facility as being subject to the requirements of this section. This Order is a mechanism to allow pipelines to participate in the exercise process. The facility would not be required to submit chemical inventories or to pay filing fees. Procedures for achieving this designation are outlined in OAC 3750-10-08. The process and application are included in Tab E- Issuance of Orders.

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2 Ohio Administrative Code. The SERC must adopt rules that outline how the LEPCs will complete the annual exercise of the Plan. The SERC's Operations and Issues Committee recommends the adoption of these rules by the SERC. Definitions are found in OAC, Section 3750-1-01. The rules are found in the OAC, Section 3750-20, items -70, and -76 through -84. The SERC must review these rules every five years and either modifies, does not change, or deletes the rules as the situation dictates. These rules were revised in October 1998 and again in July 2003.

a Rule 3750-1-01 – Definitions. A couple of definitions exist that further clarify other parts of this document.

- (Q) "Facility" means all buildings, equipment, structures, and other stationary items that are located on a single site or on contiguous or adjacent sites and that are owned or operated by the same person or by any person who controls, is controlled by, or is under common control with such person. For the purposes of section 3750.06 of the Revised Code (chemical release notification), the term also includes motor vehicles, rolling stock, and aircraft.
- (U) "Hazardous chemical" has the meaning given to that term in 29 C.F.R. 1910.1200 (c). The term also includes chemicals identified or listed in rules adopted under division (c) (5) of section 3750.02 of the Revised Code, but does not include any of the following:

  (1) Any food, food additive, color additive, drug, or cosmetic regulated by the Food and Drug Administration of the United States Department of Health and Human Services.

  (2) Any substance present as a solid in any manufactured item, to the extent that exposure to the substance does not occur under normal conditions of use;

  (3) Any substance to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and use by the general public, including, without limitation, household and consumer products that are stored prior to or displayed for distribution to the consumer when in the same form and concentration, and products that are not intended for distribution to the general public and are in the same form and concentration as products packaged for distribution to and use by the general public, unless the chemical is subject to a reporting requirement for which a variance has been issued under division (B) or (C) of section 3750.11 of the Revised Code.

  (4) Any substance to the extent it is used in a research laboratory or a hospital or other medical facility under the direct supervision of a technically qualified individual.

  (5) Any substance to the extent it is used in routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer.

b Rule 3750-20-70 – Exercise Definitions. This rule provides certain definitions that are used in the exercise program. It includes definitions for actual events, exercise

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Objectives, primary and alternate Emergency Operation Centers (EOC), operational capability, and Points of Review.

- Exercise **Objectives** are the criteria used to evaluate a specific operational function. The Objectives are the key parts of response plans and are fundamental in protecting the public's and First Responder's health and safety. Each Objective contains a specific set of **Points of Review**. These Points are used to evaluate the demonstration of a specific function or operational capability. The Objectives and the Points of Review are defined in Tab A.
- **Emergency Operations Centers** are used during major disasters to coordinate and support response activities. An EOC's essential functions include: to gather and display information, coordinate and centralize decision-making, establish response and recovery priorities, identify and coordinate resource needs, support field operations, and establish and maintain communications with field and support agencies. To qualify as an EOC for this exercise rule, the site must be a **fixed facility and be identified in the LEPC's plan**. The EOC must be capable of accommodating essential government and private agencies that have a specific and pre-planned role in the EOC.
- Plans identify one site as the County's **Primary** EOC. Plans may also identify other **Alternate** sites that can be used as an EOC. These sites are used when the Primary EOC is unavailable or when the use of the alternate location would be more practical to support on-scene operations. An Alternate EOC is also a fixed facility **and** must be able to accomplish the same essential functions as the Primary EOC, **and** must have the communications and support equipment necessary for the staff to complete the required functions.

c Rule 3750-20-76 - Types of Exercises. This rule describes the exercise types that may be conducted. They are; Tabletop, Functional, and Full-Scale. Each exercise type has specific constraints that must be adhered to when developing the exercise. The rule also notes how an actual event may qualify as an exercise. Each type is briefly noted below and is discussed in more detail in Section II.

- A **Tabletop** exercise is a "verbal" walk through or discussion of the response procedures. It is designed to evaluate plans and resolve questions of coordination and roles. It must demonstrate **at least three and not more than five Objectives**. This will allow the exercise to focus on each Objective and should evolve into a detailed discussion of those selected Objectives.
- A **Functional** exercise is a "hands-on" or physical demonstration of specific functions or operational capabilities. The exercise will evaluate **at least four but no more than seven Objectives**. An EOC or Incident Command Post (ICP) is activated for this exercise in order to show how the command structure manages the function or operation.
- A **Full-Scale** exercise is also a "hands-on" test, but it evaluates the overall emergency management program. It will test most or all of the emergency response functions as outlined in the Plan. It requires the mobilization and use of

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personnel and equipment. The exercise will evaluate **eight or more Objectives**. Also, an EOC or ICP is used to coordinate the response functions.

- An **Actual Event** may qualify as an exercise. To do so, the LEPC must submit an Exercise Notice form within thirty days of the response. The Ohio Emergency Management Agency (Ohio EMA) will then arrange a meeting with the principal participants of the response to determine whether or not exercise Objectives were successfully demonstrated. Please refer to page 2.23 for additional information on actual events.

d Rule 3750-20-78 - Execution of Exercises. This Rule outlines the basic requirements for the exercise program. It establishes an exercise cycle, defines what must be accomplished in each cycle, establishes this guide, identifies who's involved, and defines what chemicals can be part of the scenario.

- The SERC defines the "annual" exercise year to be the State Fiscal Year (SFY), which is July 1st through June 30th. The rule identifies that there is a recurring, four-year, exercise cycle. The original cycle began in SFY94. The **exercise cycle that started in SFY06 22 finishes in FY09 25. The next exercise cycle will commence with SFY10 26 and finish in SFY13 29**. During this four-year period the LEPC shall:
  - Complete at least one Full-Scale exercise in the cycle. The LEPC has the option to complete any type of exercise in the remaining three years to include additional Full-Scale exercises based upon local program need.
  - Activate and evaluate an EOC, primary or alternate, virtual or mobile, at least once in the four-year period. The phrase "activate" means the majority of the EOC members are involved and the site's equipment is being used. **NOTE**: This evaluation will be accomplished in either a Functional or Full-Scale exercise. A Tabletop exercise will not fulfill this requirement since Tabletops do not physically use equipment.
  - Demonstrate, at a minimum, all exercise Objectives identified in Tab A.
  - Follow all written procedures identified in this manual. As it is the LEPC's primary exercise reference tool, it should be consulted as necessary when developing an exercise.
  - Consider no more than two (2) actual incidents for exercise credit in the four-year exercise cycle.
  - Include local emergency response and medical personnel in each exercise.
  - Develop an exercise scenario that will involve either a facility that is subject to the plan or a transporter of hazardous materials as defined by regulations adopted under the "Hazardous Materials Transportation Act" 88 Stat. 2156, 49 U.S.C.A. 1801 (1976), as amended. For facility incidents, chemicals used in exercises can be any hazardous chemical on site as defined under the "Occupational Safety and Health Act of 1970" 84 Stat. 1590, 29 U.S.C.A. 651 as amended and the regulations adopted under it. For transportation incidents, chemicals used in exercises must be a regulated chemical cargo load,

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governed by the "Hazardous Materials Transportation Act". A release of fuel from a fuel tank (i.e. saddle tank) will not qualify as an exercise; however, see Section II, Item G 2 for parameters that may allow the consideration of an actual event as an exercise.

e Rule 3750-20-80 – Review of Exercises. This Rule defines how the LEPC exercise will be reviewed and accepted by the SERC. It establishes Ohio EMA as SERC's exercise authority and identifies what is contained in an exercise report. It establishes the criteria to Concur with an exercise, creates a corrective action program, and notes how actual events are utilized for exercise credit.

- The SERC designated Ohio EMA as the State agency who will observe and conduct the reviews of the LEPC annual exercises. Ohio EMA will receive exercise notices, create the exercise reports, and will be the general point of contact for exercising LEPC plans.
- Ohio EMA will create an exercise report following the conduct of each exercise or actual incident utilized for exercise credit. The agency has sixty days from the date of the exercise to complete the exercise report. This rule establishes what is contained in the report. The exercise report will contain a general synopsis of the exercise's results and provide specific comments and recommendations on any Point considered to be Not Met by an Evaluator. The report will make recommendations to SERC to either Concur or Refuse to Concur with the conduct of the exercise. An order to Refuse to Concur requires the LEPC to complete a Corrective Action Plan (CAP).
- A CAP will be required when any Evaluator and the Facilitator determine that an exercise did not adequately demonstrate a majority of Points for a specific Objective. In this case, Ohio EMA will forward the exercise report to the LEPC and direct them to develop a CAP. This CAP must identify what actions have been taken or will be taken to correct those Points considered to be Not Met for a specific Objective. The LEPC has sixty days from the receipt of the report to identify the corrections and to submit their CAP to Ohio EMA. Ohio EMA will review the CAP and determine if it adequately resolves the exercise issues. In turn, Ohio EMA will provide the CAP, exercise report, and Facilitator's recommendation to Concur to the SERC for their consideration.

Finally, this rule notes what steps must be taken for an actual incident to qualify as an exercise. The LEPC must submit an Exercise Notice form to Ohio EMA within thirty days following the response. The Ohio EMA will schedule a meeting with the LEPC to interview personnel who were involved in the response. Ohio EMA will use the Exercise Evaluation forms to determine if the event adequately demonstrated the chosen Objectives. Ohio EMA will treat the event as if it was an exercise and follow the same procedures to report the event's findings to the SERC and the LEPC. An actual event that receives an Order to Refuse to Concur is subject to the same CAP requirements utilized for exercises.

f Rule 3750-20-82 - Issuance of Exercise Orders of the SERC. This rule outlines how SERC will ultimately issue an order to Concur or Refuse to Concur with the exercise.

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- Ohio EMA will submit an exercise report to the SERC that will contain a recommendation on whether or not to Concur with the conduct of the exercise. The SERC will Concur with the exercise when:
  - A majority of Points within each Objective was adequately demonstrated during the exercise, or
  - The LEPC completes and submits a Corrective Action Plan that adequately addresses the problems (Not Met Objectives) identified in the exercise report.
- The SERC will Refuse to Concur with an exercise only after the LEPC was directed to submit a Corrective Action Plan and either:
  - The Ohio EMA determines that the submitted plan does not adequately address the problems identified in the report, or
  - The report was not received within the sixty-day deadline.

g Rule 3750-20-84 - Public Review of Plan Exercises. This rule requires that each Committee shall discuss the conduct and review of each Full-Scale exercise at a meeting open to the public. The public meeting may be held at a regularly scheduled LEPC meeting or at a separately advertised meeting. The meeting will include discussion of issues concerning the exercise and public commentary. The rule also notes that the public meeting must be advertised as per the "Sunshine Law" (ORC 121.22).

3 Federal Law. Many of the State statutes and rules refer to federal law for the definition of terms. For example, the term "hazardous chemical" in rule 3750-20-78(H) is defined in the Occupational Health and Safety Administration Act (OSHA) and the regulations adopted there under, and in Ohio Administration Code 3750-1-01(U).

a The OSHA regulations which define "hazardous chemicals" are set forth in 29 CFR 1910.1200(c).

b 29 CFR 1910.1200(c) defines a "hazardous chemical" as any chemical which is a physical hazard or health hazard. 29 CFR 1910.1200(c) defines "physical hazard" and "health hazard" as the following:

- A *Physical hazard* means a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, or organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.
- A *Health hazard* means a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term "health hazard" includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, ephrotoxins, and neurotoxins, agents which act on the hematopoietic system and agents which damage the lungs, skin, eyes, or mucous membranes.

Thus, if any substance meets any of these conditions, it can be used in an LEPC exercise. It does not have to be an Extremely Hazardous Substance (EHS) or OSHA regulated chemical provided the additional stipulations outlined in the definitions

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provided in OAC 3750-1-01 are met.

4 SERC Policies/Resolutions. The SERC adopts and passes resolutions that impact how LEPCs shall comply with a law or rule under SERC control. For exercises, the SERC's Operations and Issues Committee will address and develop these resolutions. The following resolutions are still in effect and should be reviewed before developing an exercise.

a Resolution 96-159. LEPCs are responsible for selecting the exercise Evaluators. In the past, some LEPCs used Evaluators who were not familiar with local procedures or the LEPC's plan and the Evaluators were not able to objectively evaluate the exercise. Nor could they provide credible or useful feedback to the LEPC. This defeated the purpose of conducting an exercise and the learning experience needed to improve not only the Local Plan but the response Standard Operating Guidelines (SOGs) for the First Response agencies and organizations.

To resolve this issue, SERC passed this resolution to require each LEPC to choose Evaluators who are knowledgeable in the areas they will evaluate. For example, the Evaluator who observes response personnel safety must have training and response experience in Hazmat and incident safety operations.

The resolution also requires the LEPC to give each Evaluator the Plan sections or local procedures that pertain to the Objectives they are to evaluate. The materials must be provided in advance of the exercise so the Evaluators can review and be familiar with the procedures they are to evaluate. If an Evaluator already has a copy of and uses the local procedures, there is no need to copy or re-issue the materials.

To monitor the process, the SERC's Facilitators will note when any Evaluator was not properly prepared or capable to evaluate the assigned Objectives. The Facilitators will include a statement to this affect in their exercise report if an Evaluator was not prepared and how it impacted the exercise evaluation. The SERC will take this into consideration as part of its decision to either Concur or Refuse to Concur with the conduct of the exercise.

This resolution was passed on August 14, 1996.

Please refer to Page 2.15 of this manual for additional information on Evaluator criteria.

b Resolution 99-49. This resolution officially adopted this manual as its current exercise guide. As changes are made to the exercise process, the SERC's Operations and Issues Committee will revise this manual.

This resolution was passed on February 9, 1999.

c Resolution 03-283. Annually, the SERC provides monies to each LEPC that allow them to implement their program. The funding is based in part on the LEPC completion of an annual exercise. This resolution amended how the SERC determines what amount of funding the LEPC should receive as it relates to exercises.

The resolution notes that if the LEPC has completed an exercise which has received an Order to Concur by the SERC, then the LEPC would receive $2,500.00 as part of its annual funding. It further notes that those LEPCs whose exercise received an Order to Refuse to Concur would only receive partial funding at $1,250. However, the LEPC may

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receive the full exercise amount upon completion of a CAP that meets the SERC requirements. Please note, even though it is not specifically stated, the LEPC will not receive any exercise funding as part of their overall grant if they fail to complete the annual exercise.

This resolution was passed on August 13, 2003.

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SECTION II - LEPC EXERCISES

The Local Emergency Planning Committee is responsible to conduct an annual exercise of their plan. The LEPC should use this manual to ensure that all exercise provisions under Ohio law are satisfied. The following section outlines the basic steps that should be followed to develop and conduct the LEPC's annual exercise. This is a brief overview of the exercise process. It is not the only way in which to develop an exercise. It addresses the law's unique exercise requirements and how to accomplish them. To learn more about designing or conducting an exercise, the LEPC should consult specific guidance such as the NRT-2 (National Response Team) exercise guidebook or by taking take an exercise design course. See Tab D for a listing of available exercise guides and/or courses. Advance planning and coordination amongst all partners during the exercise cycle are very important to avoid duplication of effort and to ensure all objectives are met.

A Exercise Considerations

1 Purpose. Exercising is the principal means of testing a program's ability to implement its response procedures and/or guidelines. It allows First Responders, agencies, and organizations to practice procedures and interact with other agencies in a controlled setting. Participants identify and make recommendations to improve the overall emergency management program. The fundamental purpose is to improve how to implement procedures and/or guidelines. In support of that goal, an exercise should be used to:

- Reveal planning weaknesses and strengths in the Plan or local department Standard Operating Procedures/Guidelines (SOP/SOG), or to test and validate recently changed procedures and/or guidelines.
- Improve the coordination between various response organizations, elected officials, and community support organizations.
- Validate the training of the critical elements of emergency response, (i.e. incident command, hazard recognition, evacuation, decontamination, etc.).
- Increase the general awareness and understanding of the hazards present in the community.
- Identify additional resources, equipment or personnel, needed to prepare for and respond to a chemical incident.

There is also a legal requirement to exercise. The LEPC must complete a minimum of one exercise per year. The exercise year is based on the State Fiscal Year (SFY), July 1st through June 30th; for instance SFY08 started July 1, 2007 and concluded on June 30, 2008. It is setup this way due to the State's funding system. The amount of monies received in the annual LEPC grant depends, in part, on whether or not the LEPC has completed an exercise. The law established a recurring, four-year exercise cycle. **The exercise cycle that started in SFY 06, finishes in SFY 09; the next exercise cycle will commence with SFY10 and finish in SFY13.** Within this four-year period, the LEPC must complete a number of tasks. Those tasks were discussed above and will be repeated throughout this manual as a reminder.

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2 Determine Exercise Need. The first step after deciding to conduct an exercise is to determine what needs to be tested. The LEPC should review the following issues in order to establish what the annual exercise will involve.

- What types of exercise were completed in the past, how effective they were, and what type should be used next?
- Which Objectives were evaluated in the past and which ones still need to be evaluated?
- Which exercise Objectives were tested previously? Were they adequately demonstrated? What are remaining Objectives that need to be exercised in the present four-year exercise cycle?
- What exercise requirements (3750-20 (B) and (C), if any, have not yet been evaluated?
- Which departments and personnel were involved in past exercises, who would benefit from this year's test, and who is available to participate this year?
- Should the exercise involve either a Facility or a transporter of hazardous materials?
- What date and time would be best to conduct an exercise and will allow involvement by the maximum number of organizations?
- What will be the expense of conducting the exercise, including employee overtime and equipment costs?
- Combining of various exercises should be considered to reduce annual exercise costs.

This process should be a general review of the program's ability and readiness to conduct an exercise. This step is typically considered a "needs" or "capability" assessment. The assessment is used to determine how the exercise can fulfill needed training instead of just fulfilling a legal requirement. An LEPC can even use this process at the start of the four-year exercise cycle to outline what functions and exercise types will be completed over the entire four-year period. The LEPC should review FEMA's *Exercise Design* course Student Manual for more about the benefits of "Building an Exercise Program".

3 Designate an Exercise Design Team. The entire LEPC should not be used to design and conduct the exercise. Instead, the LEPC should appoint an Exercise Design Team to develop and run the exercise.

The Team's membership can be comprised of LEPC members solely, or include a few members from local organizations who have expertise in the Objectives to be tested. For example, if Shelter Management is to be tested then an American Red Cross lead shelter organization representative should be on the Team. Or, if Response Personnel Safety is to be tested then a Hazmat Team member or someone trained in Hazmat Operations should be on the Team. If a Facility is involved, its representative should be asked to address their needs and procedures.

There is no set size for an Exercise Design Team. The size normally depends on the exercise type, materials involved, and the number of functions to be tested. The bigger and

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more complex the exercise, the larger the exercise team may become. The size should be small enough for the Team to be able to meet when needed, yet large enough to develop a complete exercise.

Once the Exercise Design Team has been selected, the group should ensure they have one person designated as the Exercise Director. This person will have the overall responsibility for developing the exercise and leading the group through the process. It is recommended that an LEPC member should be designated the Exercise Director.

The NRT-2, page 15, elaborates on how to establish an Exercise Design Team. Also see FEMA's *Exercise Design* course Student Manual on "Organizing a Design Team".

B Exercise Development

1 Design Activities. Exercise design is the most critical part of doing an exercise. If the exercise is not properly planned, the exercise will likely fail to achieve the LEPC's desired goals. FEMA has outlined a number of steps that can be followed when developing an exercise. These steps include but are not limited to:

a Conduct Needs Assessment. The LEPC should complete this step before appointing an Exercise Design Team. The assessment is used to give the Team direction on what type of exercise needs to be completed. The Team should review local training needs, review existing plans, and procedures and/or guidelines, and discuss lessons learned from recent events. They should review what hazards exist that may be used in an exercise scenario. They should discuss the need to exercise with local facilities or identify which transportation hazards should be exercised.

b Determine Exercise Scale. From the needs assessment, the Team can identify how large and detailed the exercise will be. The Team should discuss how many agencies want or need to be included. They should determine how great the impact or how complicated the hazardous chemical release will be. The Team should identify what portions of the plan or local procedures and/or guidelines should be evaluated, such as sections not recently evaluated or that are newly updated. The Team should identify if there are other emergency plans within the County that might need to be exercised in conjunction with the Hazmat Plan. The Team can now determine the type of exercise to be completed.

c Select Exercise Type. The Team will use the discussion about the needs assessment and exercise scale to define what type of exercise is best suited to meet those needs. Communities who have not completed a functional or full scale exercise should first consider completing a Tabletop exercise before taking on field exercises. Field exercises should be used to focus response operations and evaluations on specific hands-on activities.

d Select Exercise Objectives. Based on the exercise type, the Team will select which Objectives will be used to adequately test the plan. The selected Objectives should relate to each other in order to make exercise design a simpler task. Tab A outlines each Objective to include tips on what issues should be considered when developing an exercise to test the Objective. Also remember that each exercise type is limited to a certain number of Objectives.

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e Develop Exercise Scenario. The scenario should outline what the incident will include such as the time of the incident, the weather conditions, the location of the incident, and the likely impacts or problems posed by the incident. The Team will also identify if the incident will be Facility or Transportation related, or a combination of the two.

f Outline Major Events and Expected Actions. The Team should develop a timeline of what major events will occur during the exercise as it pertains to the Objectives being tested. For each key event, the Team can identify what expected actions, personnel, and resources will be used to resolve the event. Using the expected actions, the Team will identify what tasks responders will physically complete versus those actions that they will merely need to simulate.

g Identify and Develop Simulations. The Team will determine how to setup the accident scene so that it realistically portrays the incident. This includes the need to simulate injuries, draft exercise messages/inputs, and use of props to create the accident site. The scene setup should allow responders to fully implement their procedures and/or guidelines with a minimum of simulation or exercise control.

Identify and Organize Participants. The Team should identify what agencies and personnel will be asked to participate as Players, Controllers, Victims, and Evaluators. The Team should look at which personnel or departments need experience, have the training, and can provide the resources. The exercise may also need to include adjoining County departments or personnel (i.e. mutual aid, Hazmat teams) for a combined exercise. The Team can also identify what other personnel or groups may wish to attend as Observers.

The following sections take a closer look at these steps and what unique concerns each pose.

2 Selecting an Exercise Type. SERC has approved three (3) types of exercises, or an actual occurrence, that will be used to test local plans and procedures. Each exercise has unique design considerations that the Exercise Design Team needs to understand. A minimum of one (1) Full-Scale exercise must be completed within the four-year exercise cycle. In the remaining three (3) years, <u>any</u> type of exercise may be completed. Also, no more than two (2) actual events may be claimed for exercise credit in the four-year cycle.

a Tabletop exercise. The basic purpose of this exercise is to solve problems in a group discussion. This is normally used to provide elected officials, department officials, and individual personnel the opportunity to evaluate staff coordination, review plan elements, or prepare for a larger exercise. The exercise typically involves only key personnel from a given agency and not the complete staff.

Each Tabletop shall demonstrate at least three (3) but no more than five (5) exercise Objectives. The limitation will allow participants to <u>fully</u> discuss each Objective. The Team should also be aware that some Objectives are not well suited for a Tabletop discussion. An example would be Communications, which requires that it be tested not by discussion but by conducting and testing the actual communication capabilities. Tabletop exercises do not use equipment, they discuss procedures and/or

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guidelines. Tab A reviews each Objective and includes a discussion on exercise design issues.

Tabletop exercises are conducted in one of two ways. The first option uses a Controller to present problems to the participants as a whole. The problems are addressed one at a time until the group is satisfied with their response. If something is overlooked, the group can return to that topic and modify their response. The Controller may query Players as to why or how an action is taken to further the discussion. The second option uses pre-scripted messages to generate problems. These messages are given to individual Players who must then relate and discuss the problem with the group. A Controller is available to clarify a particular message, but does not lead the discussion. Players may receive a number of messages or problems at one time. Therefore, they will have to work together to prioritize and resolve the issues. In either case, participants practice problem solving to resolve questions about responsibilities, procedures and/or guidelines, and coordination with a minimum of stress. The Controller will act as a moderator so that one subject does not become the sole focus of the discussion versus spending little or no time talking through the topic.

In the designing of the Tabletop, the Team should ensure the Controller's discussion or inputted messages address the chosen Objectives' Points of Review. The inputs should not be worded verbatim from the Points. Instead, the inputs should create problems in relation to the Points. The Controller should be prepared to generate inputs in case the discussion is not addressing the selected Objectives. It is important to include everyone in the discussion and to ensure no one agency dominates the exercise. In the design process, the Team and Controller need to ensure there are problems that will involve all participants. During the exercise, the Controller needs to draw personnel into the exercise to acknowledge issues and provide their insights.

The Tabletop exercise should only require the use of one or two Evaluators. A critique is held immediately following the exercise. It will likely be brief as the participants have already discussed and identified procedural needs. It should be used to recap and document which key issues require change.

b Functional exercise. The functional exercise is a "hands-on" activity and is designed to evaluate one or two specific functions (i.e. Incident Command, Decontamination, etc.). The Functional exercise requires the use and deployment of equipment for those functional areas being evaluated. The exercise is meant to test not just the response capabilities of personnel but also to test the coordination used to manage the agencies, personnel, and equipment on-site. Actions take place in real time and the exercise does not stop to re-train personnel or redo a task. An ICP or EOC is activated to physically demonstrate the command and control structure.

Each Functional exercise shall demonstrate at least four (4) but not more than seven (7) exercise Objectives. The Team should choose to evaluate Objectives that closely support each other in order to make the exercise more realistic and less complicated.

This exercise takes more pre-planning and design. The Team should use a Timeline and a list of Major Events with Expected Actions to design the exercise. They will need to setup a realistic incident environment that closely resembles a real emergency. They

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will use props and simulated events to create the realism. The day of the exercise, members of the Exercise Design Team become the Controllers to ensure Players understand the scenario.

The key to a successful Functional exercise is having a realistic scenario and scene, and to ensure there are sufficient Players and resources available to "physically" demonstrate each Objective. Simulation is kept to a minimum. Players need to be given a pre-briefing on the Objectives to be evaluated, the manner in which simulations will be carried out, and a review of ground rules and safety issues. The exact details of the hazards and problems to be resolved are not provided. The exercise can start at any point in the response timeframe and will end when designed activities have completed the demonstration of the Objectives. Equipment and personnel are staged near to the scene to avoid running "lights and sirens" to the scene.

The Functional exercise can require as few as two and up to twelve Evaluators, depending on how many Objectives are being completed and where the field play will occur. For example, if Initial Notification and Communications are being evaluated there should be an Evaluator with each Dispatch office as well as on-scene.

A critique is held immediately following the exercise. The Controllers should lead the discussion and have the participants speak first and actively review their actions. Evaluators should then summarize their findings for the group. Throughout, the Controllers should document which issues require change or further discussion at a later date.

c Full-Scale exercise. The Full-Scale exercise involves "physically" testing a major portion of the emergency plan. This exercise includes the actual movement of emergency personnel and resources to a variety of sites over a number of hours. It involves the coordination of numerous emergency response organizations and resources to demonstrate a coordinated response capability. The emphasis on completing multiple functions will evaluate the community's ability to manage a major emergency or disaster. An ICP and/or EOC is activated to demonstrate the command structure. A minimum of one (1) Full-Scale exercise must be completed within the four-year exercise cycle

The Full-Scale exercise shall demonstrate eight (8) or more Objectives. The number of Objectives chosen may be limited to how many agencies and resources will be available to participate in the exercise.

This exercise requires the commitment of large number of agencies and officials. The Team must ensure that there is enough lead-time given to likely participants in order for them to schedule and participate in the exercise. The LEPC should ensure the respective response groups and elected officials understand and support the need to complete a Full-Scale exercise. The Team will then design and complete the exercise in the same manner as they would for a Functional exercise. During the exercise, there may need to be more Controllers than in a Functional exercise to facilitate exercise flow. Most problems will arise from logistical issues such as arranging adequate resources to participate in the exercise. Scene setup is also critical so that the disaster site is realistic.

The Full-Scale exercise will involve a number of Evaluators, anywhere from eight to twenty. The Team needs to define how many sites will require an Evaluator in order to

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observe the Objectives. It may also require multiple Evaluators to review one Objective. The critique will therefore be more complicated. Due to large number of participants, the critique does not need to include every Player. A brief review of the actions taken can be conducted for the Players immediately following the exercise. However, the Evaluators will need time (up to one hour or more) to meet and organize their findings. This is especially true when multiple Evaluators review the same Objective. They may not be ready to debrief personnel immediately following the exercise. The Team can elect to have key personnel, the Evaluators, and the Facilitator meet at another time to discuss the evaluation.

Full-Scale exercises must be "publicly" debriefed. The LEPC is required to meet and discuss the review of the exercise at a meeting open to the public. This must be advertised, as would any public meeting in keeping with Ohio law. The meeting will include a discussion of exercise issues, make available the exercise report, and allow for public comment. This meeting is separate from the responders' critique since the exercise report, based on the Evaluators' findings, will not be complete at that time. This meeting should therefore be either a separately advertised meeting, or should be held during a regularly scheduled LEPC meeting. The last option is usually the easiest to coordinate and should allow the Facilitator enough time to draft the exercise report.

d Actual Events. The most realistic test of the plan is an actual response to a hazardous chemical release. As such, an actual event can qualify as an exercise. An actual event is defined as an incident that is reported in accordance with ORC 3750.06.

The LEPC can use up to two (2) actual events in lieu of conducting an exercise in any two years within the four-year cycle. Also, the LEPC can only claim credit for either a Functional or Full-Scale exercise. Tabletop exercises do not qualify as they are not "hands-on" events. The intent of the Tabletop is to "discuss" and "question" procedures and/or guidelines, and this is not completed during the response to an actual event. As a side benefit, the actual event can save the LEPC the cost of conducting an exercise.

Item G of Section II discusses in greater detail how to use an actual event in lieu of conducting an exercise.

3 Exercise Objectives. The SERC has established thirteen (13) pre-scripted Objectives that will be tested by each LEPC. LEPCs must evaluate each Objective at least once within a four-year period. If a Point of Review in an Objective is considered to be Not Met, it is highly recommended to re-test and evaluate that point in the Objectives in future exercises to determine if past problems have been resolved. It should be noted that some Objectives, by design or choice, may be evaluated more than once in the four-year period (i.e. Incident Command).

In selecting exercise Objectives, the Team should review the description of the Objectives and the respective Points of Review. These are defined in Tab A. Tab A provides a review of the intent and focus of the Objective. It identifies what each Point of Review is meant to evaluate. There are concerns and tips identified to assist the Team when designing the exercise for the given Objective. Finally, the Tab provides insight on how/where to evaluate the given Objective. The Team should review that section to ensure that the

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Objectives selected can be fully demonstrated by the exercise type chosen. This will then help the Team to develop its exercise scenario, messages, and simulations.

Each LEPC is required to exercise every Objective regardless of the capabilities and limitations within the county. However, it is recognized that some Counties do not have the capability to conduct some procedures without the direct assistance of outside agencies. For example, not every County has a Hospital or Hazmat Team who will be needed to complete some tasks such as victim treatment and/or decontamination. In this example, the County may not be able to test Objectives such as #7 or 13 without outside help. To resolve this possible conflict, the Team needs to solicit and receive the support of those groups to participate in a local exercise. Since the County already relies on their assistance for actual emergencies and should have mutual aid with those groups, the LEPC should have no trouble getting their support once within a four-year period. Without this assistance, the County is relying on procedures and/or guidelines that may or may not work. An exercise is the best way to identify and resolve response conflicts.

If the County cannot arrange the required cooperation, they will need to discuss this issue with their respective Ohio EMA Emergency Management Specialist. If necessary, the SERC's Operations and Issues Committee may be asked to assist in gathering the support to evaluate a given Objective. Again, every County shall test each Objective at least once within a four-year period.

4 Develop an Exercise Scenario. After the Team has determined which Objectives it wants to exercise, the next step is to develop a realistic scenario based on a probable incident. Exercises must involve either a Facility that is subject to the plan or a transporter of hazardous materials.

- The SERC recognizes that a "Facility that is subject to the plan" is often referred to as a site that commonly uses, stores or manufactures hazardous chemicals but the actual definition is located in the ORC and OAC definitions. OSHA's Hazard Communications standard (29 CFR 1910.1200) and the OAC define the requirement for a hazardous chemical. These chemicals do not have to be EHSs, nor do they have to be part of the annual reporting process. This includes sites such as non-EHS Facilities, school laboratories, medical facilities, warehouses, etc.
- The SERC recognizes that a "transporter of hazardous materials" is one who is regulated by the Hazardous Materials Transportation Act, as amended. This includes, but is not limited to rail, road, vessel, or air carriers. If a transporter is used, the scenario must involve a release of the regulated load. This means the LEPC cannot use a fuel release from a saddle/fuel tank on the vehicle. Instead, the fuel release must occur from the tanker, trailer, boxcar, or cargo hold; however, see Item G 2 of this section for parameters that may allow the consideration of an actual event as an exercise.

The scenario will be submitted to Ohio EMA as the second part of the LEPC's Exercise Notice. As indicated on the form, the scenario should be a narrative that describes the incident to include meteorological conditions. This is a general overview of what is to happen, when, where, and how. It also needs to outline the likely sequence of events that will occur. This identifies what should happen first, second, third, or simultaneously, and

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will include any unique problems that will be inputted by the Team at specific times. The scenario should identify what hazardous material(s) will be involved and a description on how it is being released. The scenario needs to identify what geographical areas and populations will be affected by the release, and how. For example, it would discuss how a gaseous cloud would drift into a nearby trailer park and make 100 people physically sick. If the exercise is not going to test an off-site response and will only focus on the on-site tasks, this issue can be omitted.

Scenarios should be both realistic as well as challenging. This will increase the training gained from the exercise and generate support for future exercises. The NRT-2, page 16, provides a discussion on exercise scenario development. Also, FEMA's *Exercise Design* course Student Manual addresses the various tasks and steps needed to fully develop a scenario depending on the exercise type chosen.

5 Outline Major Events and Expected Actions. Overall, the scenario should be developed to focus the exercise play on the selected Objectives. To better visualize, FEMA uses a technique to organize the Team's thoughts. FEMA first recommends that an Exercise Design Team should walk through the scenario and identify the key events. Key events are situations that occur during the emergency. For example, the tank explodes, victims are discovered, and the release is stopped. Each event should cause one or more expected actions from one or more agencies. The Team can now list what actions those personnel will likely take. These actions sometimes happen in unison or follow specific steps, and may involve more than one agency.

This process will outline how the exercise should proceed. It will identify what props and events are needed by the Team to create a realistic emergency. It will then identify what personnel and resources are needed to implement procedures and/or guidelines. It will also identify which actions must be taken to fully demonstrate the selected Objectives and which actions need not be accomplished, as they do not pertain to the evaluation. FEMA's *Exercise Design* course Student Manual pages 9-16 thru 9-24 and FEMA's *Guide to Emergency Management Exercises*, pages 56-66, discuss the importance of this process.

6 Identify and Develop Simulations. As noted previously, a well-scripted scenario will allow the Team to identify what exercise enhancements are needed to setup the scene and run the exercise. The types of simulations will vary for each exercise type.

a For a <u>Tabletop exercise</u>, the Team can use one Controller to lead the discussion and thus would only need a well-scripted scenario and the list of major events/actions. The Controller will be responsible to see that the problems are clearly understood. If the exercise will use messages to create exercise play, the Team will need to use the list of major events and expected actions to develop messages. These messages are worded to create problems and see if personnel respond as expected. If actions get off-track or do not get accomplished, the Team will have to create and input messages during the exercise to get the discussions back on-track.

b For a <u>Functional exercise</u>, this will depend if this is an EOC-only test or a field test. An EOC-only test will only activate an EOC and there may be no field play. In this case, the Team will simulate the emergency and will role-play the functions being completed in the field. They will input the field response needs that will be typically relayed to an

EOC. EOC members will then address the issues and reply back to the "simulators" as needed. This is run much like a Tabletop exercise where messages run the exercise, but EOC members physically use all of the EOC's assets including communications. This type of exercise can be used to satisfy the need to physically activate and evaluate the Primary EOC in the four-year period.

In a field test, the Team will need to "setup" an accident site that simulates a real emergency scene. Props are used to represent the hazards. For example, water is dyed green to simulate a corrosive liquid. Or, a smoke generator is used to create a toxic cloud. The more realistic the scene, the less the Players have to guess as to what is going on. Controllers are then used to clarify the Player's concerns and to input additional problems.

For **a Full-Scale exercise**, the simulation is handled like a Functional exercise. However, there may be more props needed depending on the size and complexity of this exercise. Controllers may be needed in more than one location to ensure expected events or problems are input in a logical order. If an EOC is activated for this exercise, actual field play will initiate EOC activities and should not require simulated messages unless needed to create a problem.

FEMA's *Exercise Design* course Student Manual discusses these issues and offers examples of exercise enhancements that will make an exercise appear as realistic as possible.

7 Identify and Organize Participants. When deciding which agencies, departments, or organizations should be in the exercise as Players, the Team should consider those that would normally be involved, if the planned scenario were a real incident. In order to meet certain Objectives of the exercise, the Team may need to exercise a particular organization or agency, or to conduct the exercise in a certain area of the district, or combine the exercise with exercises of other entities responsible for maintaining and testing emergency plans.

Before committing significant time in developing the exercise, the Team should first identify what agencies are needed. The Team can use the major events and expected actions list to identify who is needed to adequately demonstrate the chosen Objectives. The Team should then ask for and receive a commitment from those groups to participate. The Team should clearly brief the departments or groups on what roles or functions they will be asked to fulfill. The participants should be told which Objectives will be evaluated and provide a general synopsis of what the exercise will encompass.

The Team should not provide a full description of the scenario. This would take away from the training and evaluation aspect of the event. Instead, they only need to explain what actions they are likely to take, how many resources they may need to provide, and when/how long the event will occur. This needs to be done well in advance in order to allow those groups time to arrange schedules and fully participate in the exercise.

It is also recommended that the Team informs and solicits the support of the local elected officials. Otherwise, an official could pull their department's support if they find out later an exercise involves their assets and they were not consulted.

The Team should only invite those departments and personnel that are reasonably needed

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to conduct the exercise. If too many are invited, there may not be enough activity to warrant their use. They will feel as if they have wasted their time and will not likely participate in future exercises. Some agencies want to invite themselves to participate even though there will be no functions for them to complete. The Team should politely discourage this and should not expand the scope of the exercise. A simple exercise can quickly get out of control as people add themselves into the exercise. Instead, invite these groups to participate in or host the next exercise.

Finally, the LEPC is encouraged to include or invite State agencies to participate in a local exercise. Agencies such as the Ohio State Highway Patrol (OSHP) and Ohio Department of Transportation (ODOT) typically have field offices and may want to be included. It provides them additional training and helps them to learn more about the local community's response abilities and needs. The LEPC should also consider including outside response or technical support people from Ohio Environmental Protection Agency (OEPA), State Fire Marshal (SFM), Public Utilities Commission of Ohio (PUCO), or Ohio Department of Natural Resources (ODNR). These personnel often are involved in real emergencies and can be part of local exercises. By including the State agencies, the interaction should improve the county's understanding of what functions those agencies can or cannot provide during a response. The LEPC should not wait for a State-directed exercise to invite or include State agencies in a local exercise.

C Exercise Control Issues

1 Controllers. On the day of the exercise, the Exercise Design Team members assume a new title: Controllers. The Team members are excellent to utilize as the exercise Controllers, as they have designed the exercise and are familiar with how it should be completed.

Controllers are non-exercise Players. A lead Controller is responsible to start and conclude the exercise. For field exercises, Controllers should have communications capability so they can coordinate when to input messages or the need to create an unplanned message. They are responsible to let responders know when they can and cannot simulate a response activity. For example, Players demonstrating decontamination may be permitted to not use soap and water with the concurrence of the Controller. Controllers ensure Players complete those tasks needed to demonstrate an Objective. They should not permit Players to simulate tasks if the work can be realistically accomplished.

The Controller's main purpose is to help keep the exercise on-track as envisioned and planned. They interject either pre-planned or spontaneous control messages to create new problems or to force Players to address an issue. They can clarify Player questions, but they do not resolve the issues for the Players. For example, they note that the green liquid is actually a dark oily substance but will not tell them what the material is. They also let Players know whether or not a response function was successful. For example, Players may insert a plug or patch a leak, but Controllers can remove the fix to further challenge responders.

Controllers must also monitor all the safety aspects of the exercise. For example, a Player not wearing Self-Contained Breathing Apparatus (SCBA) or the appropriate Personal Protective Equipment (PPE) may approach a toxic material. The Controller should give the Player clues they are becoming sick or the chemical smell is increasing. The Controller can

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ultimately inform the Player that they are now a victim and must act as one. The Controller should debrief the Player on their mistake and how to avoid the same mistake next time. More importantly, the Controllers should watch for and immediately stop an action that would create a real emergency. Safety is paramount.

Overall, one Controller is used in a Tabletop exercise to moderate a discussion, while three or four additional Controllers may be needed to interject messages. Field exercises require using enough Controllers to monitor exercise play in each location. Controllers should be discouraged from changing the planned scenario as it may lead to unexpected actions by the participants. Changes should be added only after serious consideration to insure it does not modify the planned event.

2 Simulation. Two issues are addressed here. First, the ability to create a realistic incident scene requires some simulation and make-believe. This is created by the Exercise Design Team and carried out by the Simulators. Second, it is recognized that an exercise will test only those functions or tasks, which are to be evaluated. However, those actions may require responders to complete a function that is not being evaluated. To expedite exercise play, responders can be permitted to simulate those tasks and thus allow them to focus efforts on the evaluated functions. Below is a brief review of these considerations.

a Simulators. Like Controllers, Simulators are non-exercise Players. They are used to portray or input pre-scripted or spontaneous scenario problems. These inputs are designed to provide the realism needed to have the Players respond as planned. Inputs include the release of smoke around the scene, the use of victims, the role-playing by grieving families, phone alerts to 9-1-1 operators, or the arrival of the media. As the Exercise Design Team outlines its major events and expected actions, they will identify what events are needed to be generated to simulate the emergency and make the scene as realistic as possible. They can then identify what tools or techniques will be used to create this environment.

During the exercise, Controllers will ensure Simulators understand their roles and oversee when/how the events are to be initiated. Controllers may act as Simulators. They can generate problems to force personnel to respond to a situation that is being overlooked or misunderstood.

Simulators are not authorized to make any changes to the exercise scenario during the event.

b Simulated Exercise Play. Simulation applies to the Functional and Full-Scale exercises where Players are to physically demonstrate the functions. As responders react to the scenario and implement local procedures and/or guidelines, there are times at which those actions can be simulated. The Players' activities should only be simulated in three situations.

First, when actions are not going to be evaluated and would not negatively impact other actions, the Controller can acknowledge that the action would have been completed. For example, the Incident Assessment Objective requires the IC to determine what population protective action must be initiated. If the Population Protective Actions Objective is not being evaluated, the IC only needs to announce what measure would be completed but the action is not physically accomplished. This will save time in

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completing the exercise and will allow Players to focus their attention on those actions that are being evaluated. In this case, responders must carry out their actions to the fullest extent possible. If they are going to evaluate Population Protective Actions, then Players must physically complete the evacuation or in-place sheltering. Players cannot simply explain how they would manage the task; they must physically complete the task.

The second situation occurs when response actions require the use of a limited or costly resource. Responders may need specialized equipment (i.e. Class A suit) to control a release, but cannot afford the use of that resource in an exercise. For example, responders can simulate the use of a Class A suit by wearing a Tyvex suit. This allows personnel to still demonstrate the function (donning suits and making entry) without utilizing an expensive piece of equipment. In this case, the Exercise Design Team should pre-identify what resources are too costly to use and then identify how they will have responders simulate the use of that equipment. This simulation should be pre-briefed to the Facilitator and Evaluators.

The third situation is reserved for those actions that would create a safety hazard. There may be times when the exercise play may result in an unwanted injury. Personnel operating in Class A and B protective equipment are susceptible to heat exhaustion. To prevent this, personnel first demonstrate the proper steps to use the equipment and initiate response operations. After they have adequately shown they can carry out the task, personnel may be permitted to doff the equipment and simulate its use. This should prevent unwanted injury and will help expedite exercise play. The Controller in coordination with the Facilitator and Evaluators will approve the simulation. However, personnel must first adequately demonstrate the procedures before they are allowed to simulate a task.

CAUTION: Before permitting the simulation of response activities, the Exercise Design Team/Controllers must ensure response personnel have successfully demonstrated the various Points of Review. If the majority of Points are only simulated and not physically demonstrated, the Objective is not realistically tested. The Evaluators will likely not be able to say the Points were Met. The Objective in this case will likely be identified as Not Met and the exercise will have failed to achieve its purpose.

The Facilitator may intervene in this situation and remove the Objective from the list of those Objectives being evaluated. If this is done, the LEPC will have to test that Objective in a future exercise and must do so during the current exercise cycle. The Facilitator will coordinate with the LEPC before taking this action.

The goal of the Exercise Design Team is to ensure the exercise will permit the Players to implement local procedures and/or guidelines. There should be enough Players committed to participating so that the Objective is adequately tested. For example if the LEPC is to test Traffic and Access Control, the scenario must create the need to re-route traffic, deny access, and close roads. There must also be sufficient numbers of law, fire, and/or highway personnel participating so that the actions to be taken are demonstrated. Simulated exercise play must be kept to a minimum.

3 Safety Issues. The Exercise Design Team, the participants, and the Evaluators throughout the exercise process must consider safety. Personnel must be alert for unsafe acts

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during the exercise and be prepared to take immediate action to stop and correct the situation. The following two concerns should be specifically part of the exercise design process.

a Call-Off Procedures. The Exercise Design Team should have a procedure in-place that will be used to stop the exercise if a need arises. There may be a need to stop the exercise should an actual incident require personnel to leave the exercise. Or, there may be an emergency or unsafe situation that develops on-scene (i.e. a responder collapses from heat exhaustion). A Controller, Evaluator, or Player can then use the "call-off" procedure to suspend play. Play should be resumed when the situation permits. An evaluator or player can request the controller suspend play. In the event that a call-off procedure is used to suspend play, play should resume when the situation permits.

In some instances, the Controllers, in coordination with the Facilitator, may need to declare that the exercise is completely over. This is created when a real emergency requires the commitment of the majority of assets involved in the exercise. However, the exercise should not be stopped for a "routine" emergency runs (i.e. a minor traffic accident) where only one or two assets are needed. Instead, the Exercise Design Team should ensure that the participating agencies have pre-arranged mutual aid from non-participating departments who can take those calls. Since most emergencies do not occur in isolation from other events, the exercise should be prepared to continue even though minor events may be occurring elsewhere. The exercise should only be stopped when Players must leave because there is no other mutual aid available.

When an exercise is prematurely declared over, the Controllers and Facilitator will need to decide whether to re-do the exercise at a later date or determine that enough activity occurred so that the Objectives could be evaluated and the exercise can be called complete. In the case where the required numbers of Objectives were not fully demonstrated, the LEPC must complete the exercise at a later date. The Exercise Design Team should have a back-up date pre-selected so that they may complete the exercise. The Team should not schedule an exercise in the last week of the exercise year. If the exercise is inadvertently stopped and is not complete, there may be no time left in the year to complete the exercise. In this case, the LEPC will not have met the requirements under the law and this will negatively affect the LEPC's annual award and fiscal grant.

b Communications. All simulated message and communication traffic must begin with the following statement "THIS IS AN EXERCISE". The person initiating the communication should preface their call with this statement. The person receiving the call should also repeat this statement to ensure they understand this was an exercise-related communication. This statement is used to ensure all persons listening understand this is part of the exercise and not a real event or emergency in the community.

The Exercise Design Team may use alternate radio channels or communications during the exercise. This is done to alleviate the load placed on normal channels and again lessens the chance that an exercise message is misinterpreted as a real emergency call. Players will need to be briefed when normal channels or communications techniques are not to be used. This technique should not be done when specifically testing the Communications Objective. It is meant to test the existing communications network. Instead, the above technique to announce, "This is an Exercise" must be stressed and used.

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4 Observers. Some LEPCs invite spectators to view the exercise. This is often used to educate those groups about the LEPC process and the abilities of local responders. The observers might be elected officials, persons from non-playing agencies or organizations, persons from other districts, State agencies, or the media. Some response or support groups may wish to simply observe the exercise before they participate in an exercise.

The Exercise Design Team will need to decide if Observers will be permitted to attend the exercise. Some exercise locations are not large enough to accommodate Observers. Their presence can also have a negative impact on the Players' ability to carry out their functions. The Team should also consider whether or not to provide meals to Observers who are invited to attend. If Observers are permitted to attend, procedures should be in place to keep the Observers in a designated area. If permitted to roam among the scene and Players, they may interfere with exercise play and disrupt the training being provided.

D Exercise Evaluation

1 Evaluators. Evaluators are persons assigned to observe and evaluate selected Objectives during the exercise. Their primary role is to observe actions taken by the Players and to document how/if those actions conformed to planned procedures and/or guidelines.

The LEPC is responsible for selecting individuals to serve as Evaluators for their exercise. The Evaluators can be emergency response, medical, industry representatives, emergency management, or community service personnel. The personnel can be from organizations within the district or from another district. The only requirement is that the individuals selected must be knowledgeable in the area(s) they are asked to evaluate. For example, the Evaluator who observes response personnel safety must have training and response experience in Hazmat safety operations.

SERC Resolution 96-159 requires the LEPC to ensure each Evaluator has a copy of those procedures that pertain to the Objective they will evaluate. The procedures and/or guidelines may be outlined in the LEPC's Plan or they may be part of a local SOG. These materials must be provided in advance of the exercise so the Evaluators have time to review and understand the procedures they are to evaluate. This should ensure the Evaluators provide objective feedback on those procedures and/or guidelines. Please note that if an Evaluator already has a copy of and uses the procedures to be evaluated, there is no need to copy or re-issue the materials. The SERC's Facilitator will note in their exercise report when and if any Evaluator was not properly prepared. The Facilitator will note why an Evaluator was not prepared and how it impacted the exercise evaluation. The SERC will take this into consideration as part of its decision to either Concur or Refuse to Concur with the conduct of the exercise.

By having the procedures in advance, the Evaluators are now partially prepared to evaluate the exercise. The LEPC should also ensure those persons are provided the respective Evaluation Forms they will use to conduct their evaluation. They should also be given copies of the scenario, exercise timeline, major events, and/or expected actions. The LEPC should also brief the Evaluators on how the scenario will be presented, what simulations will be used, and what actions the responders will not be required to conduct. This will ensure the Evaluators understand the scope and purpose of the exercise. This

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should be completed one or two weeks prior to the exercise. While this is best it may be difficult to accomplish as Evaluators may have travel restrictions or be coming from a distance. Trying to complete this the day of the exercise may not give Evaluators enough time to prepare for the exercise. The LEPC should include the SERC Facilitator in any such pre-briefing. The Facilitator can help explain the evaluation process, the use of the forms, the post-exercise critiques, and how the Evaluator comments will be used to write the exercise report.

When selecting the Evaluators, the LEPC should also ensure they have the appropriate number of Evaluators available. The Objectives chosen, the extent of play and the exercise type will dictate how many Evaluators are needed. One Evaluator should typically be used to observe each Objective, but they should not review more than two Objectives. More than this will cause the Evaluator to miss various events and will not be able to effectively observe each function. This defeats the purpose of the Evaluation. Tab A identifies which Objectives are best suited to evaluate together.

The extent of play may require there to be more than one Evaluator to evaluate an Objective. This is usually caused because the exercise play occurs over a large area or in multiple areas and one Evaluator cannot observe all activities. For example, the Communication Objective may begin with the 9-1-1 center, but will be supported by the Fire Dept. dispatcher, since all communications are generated on-scene, and may require Amateur Radio groups to support the shelter and EOC. To effectively monitor this amount of activity the LEPC needs more than one Evaluator in each area to observe communications. Some Evaluators may evaluate Communications along with another Objective (i.e. Incident Command) or will only evaluate the one Objective (at the 9-1-1 center).

The Exercise Design Team should ensure they have enough Evaluators to watch each Objective in each area where exercise play will occur. This generally means a Tabletop exercise would have two Evaluators, a Functional exercise may have three to six Evaluators, and a Full-Scale exercise may need eight or more Evaluators. This will depend on the extent of play. FEMA's *Exercise Design* course discusses how many Evaluators are appropriate for each exercise type.

2 Facilitators. Facilitators are the SERC's representatives to observe and report on the conduct of the exercise. The SERC has appointed the Ohio EMA as SERC point of contact for exercises and will supply a Facilitator for each LEPC exercise. Typically, the Facilitator will be the Ohio EMA Emergency Management Specialist who is assigned to a given LEPC.

The Facilitator will receive and review the LEPC's Exercise Notice. This notice allows the Facilitator to ensure the planned exercise meets SERC's exercise criteria. The Facilitator will identify how the exercise is not meeting SERC's requirements, and will provide options on how the exercise can be modified to adhere to the exercise rules. The LEPC should invite the Facilitator to participate in the design process or attend one/two exercise meetings. This should ensure the exercise meets the SERC's requirements. The Facilitator can also provide insight as to what has and has not worked in other exercises. It should also prevent the Facilitator from requiring last minute changes or not attending an exercise if the initial exercise notice shows the exercise is not being conducted to meet the exercise requirements. The Facilitator cannot accept an exercise if it does not meet SERC's requirements.

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The Facilitator is also responsible to contact each Evaluator prior to the exercise. The Facilitator will ensure each Evaluator understands the exercise scenario and the Objectives they will evaluate. They will clarify how the exercise process will occur and how the forms are to be used to document exercise observations. On the day of the exercise, the Facilitator will oversee the exercise evaluation. They will ensure Evaluators have addressed each Point of Review and have made comments on how well the procedures and/or guidelines did or did not work. The Facilitator will need some time following the exercise to meet with each Evaluator and ensure they complete their review. The Facilitator can be asked to share his/her observations and recommendations with Players during the critique.

The Facilitator might not always be able to immediately identify if the exercise successfully demonstrated each Objective. They may need additional time to review each Evaluator's comments to make this determination. These comments will be used to write the formal report of the exercise, with appropriate recommendations to the LEPC. This report will be submitted to the LEPC not later than sixty days following the exercise The Facilitator will attend the public meeting following a full-scale exercise to review and discuss the exercise report. This meeting should be scheduled so that it allows the Facilitator time to complete the report. The Facilitator will then submit the report to the SERC requesting an Order to Concur or to direct the LEPC to complete a Corrective Action Plan.

E Exercise Preparations

1 Exercise Preparations. After the Exercise Design Team has developed the exercise scenario, there may be a need to brief the elected officials, the various agencies, departments and organizations that will participate. This pre-briefing should review what Objectives are to be evaluated and what type of exercise will be completed. The Team should identify what expected resources should be brought or made available. The Team may decide to review the scenario, but specific details such as the chemicals involved and the expected actions should not be discussed. The release of too much information will result in an exercise that is choreographed and will not generate an objective evaluation. Completely rehearsed or choreographed exercises should be avoided.

Instead, participating agencies and personnel should be encouraged to prepare and train for the exercise. Personnel should use the Objectives to review the Plan and their own SOPs prior to the exercise. Individual departments may decide to conduct refresher training on specific procedures (i.e. decontamination, EOC activation, etc.). These tasks are used to develop individual and team skills, test procedures, and train on equipment. Training should be conducted for exercise Controllers and Simulators. The team may hold a pre-exercise session to review roles, provide information on last minute changes, identifying times to report, and how to input exercise messages. The Team may wish to review and explain procedures and/or guidelines with Evaluators who are not familiar with the local program. During this training Controllers and Simulators need to be advised to not change the exercise scenario or messages without approval from the lead Controller or Facilitator.

Another technique to prepare is to conduct an informal Tabletop exercise. This is an excellent training tool to prepare for the larger Functional or Full-Scale exercises. This discussion should not review the exact scenario or timeline of events. Instead, it should simply discuss the procedures and/or guidelines that will likely be evaluated for each of the

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selected Objectives. This is not considered a rehearsal since personnel will not be given or know the exact scenario. The Tabletop will allow personnel to review response activities and ensure they understand how to handle the simulated emergency.

2 Public Announcements. Although not a requirement, there are benefits and reasons why the LEPC should inform the public about the annual exercise. The first is safety. When conducting a field exercise, the general public may mistake the exercise as a real emergency. This reaction could result in 9-1-1 lines being tied up with concerned calls. The LEPC should inform those living near to the proposed exercise site that an exercise will be conducted on a given day and time. This is especially important if roads will be closed or access to an area will be denied. The public should be asked to remain clear of the area and to excuse the unnecessary delays. Remind them that this is necessary and valuable training, and provide a clear timeframe that identifies how long the delays will last.

The second use of public announcements is to generate public support. The LEPC may want to test evacuation procedures. The LEPC could ask a local subdivision to participate in the exercise and act as the evacuees. This will let the public know uniformed response personnel will be in their area and conducting an evacuation. In all cases, Players will preface their conversations with "This is an Exercise" to ensure there are no misunderstandings. The LEPC may also use public announcements just as a means to promote its efforts and to generate support for local responders.

Announcements should be made in advance of the exercise through radio interviews, newspaper articles, and/or door-to-door flyers. The use of announcements should also be coordinated with local officials to ensure they support the process. Announcements should also occur the morning of and after the exercise. The morning notice will remind those who have forgotten or missed the original broadcasts. The day after notice should thank the public for any inconvenience and to note the successes learned during the exercise.

Finally, public involvement is required following a Full-Scale exercise. The LEPC must hold a public meeting to discuss the results of the Full-Scale exercise. The meeting will allow the public to comment on or question what occurred and what was learned.

3 Final Arrangements. As the exercise date nears, the Exercise Design Team may want to conduct a final coordination briefing or pre-exercise meeting with the Players, Evaluators, or Simulators. A final meeting provides the opportunity to provide last minute changes, remind personnel of report times and locations, or other last minute adjustments.

A critical time for each exercise is the hour or so just prior to the start of the exercise. The Exercise Design Team should consider what could go wrong. For example, what if a response department is called out to a real emergency or no one is available to unlock the proposed shelter site. The team should discuss these "what if" situations and have a game plan on what to do just in case. There are a number of circumstances that may arise and cancel an exercise. The goal is to minimize those chances.

Getting the exercise started will then require coordination and pre-planning. The team should have plenty of time allotted to complete the last minute tasks. Time is needed to moulage victims, and setup props on-scene (wrecked vehicles, displaced drums). The Facilitator will meet with the Evaluators and Controllers to review their tasks and to pre-

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position themselves for the exercise. If exercise participants are being pre-staged, a Controller should meet them and provide an initial exercise-briefing if required. Players should also be reminded of where and when the Player critique will be conducted.

4 Start the Exercise. There are many techniques used to start an exercise. Tabletop exercises are usually started with a brief reminder of the Objectives and how the exercise will be conducted. The Players should be reminded that this is an open discussion and requires their active input. The Controller then simply introduces the scenario and inputs the first of many problems. Field exercises will use some form of exercise-initiating narrative or action. It may start with an exercise message into the normal emergency communication channels (i.e. 9-1-1, fire dept.) and lets the exercise develop much like an actual emergency. If the initial dispatch process is not being tested, Players will be pre-staged and briefed on what call was just received. A Controller will then let the Players move to the incident scene and begin the exercise. The Exercise Design Team must take responsibility for the exercise and ensure it starts off and continues according to the exercise scenario and timeline. See Exercise Conduct, page 19, NRT-2 for further information. The Student Manual for FEMA's *Exercise Design* course also addresses these techniques in general and for each exercise type.

F Post Exercise Activities

The exercise process does not end after the exercise play is complete. Following the exercise, a number of important activities remain to be completed. There will be a critique of the exercise play. Based on that critique, the Facilitator will complete and submit an exercise report. The report will highlight the strengths of the local program as well as make recommendations to improve local operations. The SERC will either Concur with the conduct of the exercise or direct the LEPC to make modifications to the local program. The LEPC will need to modify local operations or make changes to their plan based on the findings of the exercise. These steps are addressed briefly below.

1 Exercise Critiques. Three techniques are used to review the exercise and discuss its strengths and weaknesses. This includes an Evaluator Meeting, Player Critique, and Public Debriefing.

a Evaluator Meeting. Immediately following the exercise, the Facilitator will hold a brief meeting with all of the Evaluators. This meeting allows Evaluators to gather their thoughts and compile their observations concerning the exercise. This meeting should last no longer than 30-45 minutes. It will usually be completed as responders return equipment to service prior to the Player critique. The Facilitator uses this time to ensure each Evaluator has completed all entries on their respective evaluation forms. The Evaluators will discuss their observations and clarify what were the strengths and weaknesses of the exercise. The Evaluators will use this time to prepare a brief overview of their evaluation for the Player critique. The Evaluators will provide their evaluation forms to the Facilitator before leaving the exercise. These comments will be used to develop the official exercise report and to make recommendations for the LEPC.

b Player Critique. The Player critique gives the participants an open forum to identify what lessons were learned as a result of the exercise. This critique should be

conducted shortly following the conclusion of exercise play. Time should be given to Players so they can recover equipment and gather at a central meeting place.

The Exercise Design Team Leader or Lead Controller will conduct the critique. This person should "walk-through" the scenario with the Players and have them discuss what actions were taken and why. The critique should generate information regarding the effectiveness of the exercise to test planned procedures and the overall emergency response system. Participants should provide suggestions for improvements to plans, and procedures and/or guidelines, and for future exercises. Once the Players have had a chance to share their findings, the Evaluators should briefly recap their observations and share their recommendations with the group. The Players should feel free to respond to those observations.

Throughout the critique, the Controller or Exercise Design Team should document the comments. This will be used to determine what changes are needed for local procedures and/or guidelines, training, resources, personnel, and/or future exercises. The Controller will also need to ensure the focus of the critique is on identifying ways to improve operations. The critique should not be used to point fingers, make demeaning comments, or verbally attack any person or group. The Controller should begin the critique with a reminder that the critique's purpose is to gather constructive recommendations.

The type of exercise completed will determine the length of the critique. Tabletop exercises may take 30-60 minutes while Functional and Full-Scale exercises may take 60-90 minutes. The Controller will need to ensure discussions stay focused to identify lessons learned. The discussion should not try to completely resolve every issue. Lengthy discussions will distract personnel and detract from the intent of the critique. These issues should be noted and then used to meet at another time to resolve those concerns.

c Public Debriefing. The LEPC is required to hold a public meeting to discuss the conduct and review of a Full-Scale exercise. The purpose of the meeting is to review the findings generated by the Evaluators and Facilitator. This meeting should be used by the LEPC to outline what follow-up actions may be needed to address the recommendations made and to decide how modifications to plans or procedures will be accomplished. The meeting is also designed to allow the general public to provide general commentary to the LEPC about the exercise.

The meeting and discussion can occur at either a regularly scheduled LEPC meeting or at a specifically scheduled meeting. The LEPC must advertise this public meeting in accordance with the State's public meeting requirements (ORC 121.22). The date/time selected should not be more than thirty days following the exercise. The Facilitator will attend this meeting in order to address the exercise's recommendations and findings and the Facilitator should be able to determine which Objectives were not adequately demonstrated. The LEPC will need to coordinate the date/time and location with the Facilitator in advance so there is time to organize these comments. Evaluators are not required to attend, but they may be asked to come and answer questions about their observations.

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2 Exercise Report. The exercise report is written based on the evaluations of each Objective. The Facilitator completes this report. The Evaluators' comments and the Facilitator's observations are used to determine which Points were considered Met and to provide recommendations as needed.

The report will first review the exercise scenario and identify the Evaluators. The report then goes Objective by Objective and identifies the strengths and weaknesses observed. Each Point of Review will be identified as being Met (successfully demonstrated), Not Met (not adequately demonstrated), or Not Applicable (not pertinent to the test). For each Point identified as Met, the report will collectively highlight the strengths found in that Objective. For each Point identified as Not Met, the report will identify why it was Not Met and then provide recommendations on how to correct the situation.

Recommendations typically include the need to modify local procedures and/or guidelines or conduct additional training. The evaluation may even indicate that the exercise design/control caused the Point to be Not Met by responders. For the Not Applicable or for the exercise as a whole, additional comments may be made for those Points considered as Not Applicable. The Facilitator will identify whether the exercise successfully demonstrated each Objective based upon the Evaluator's observations and comments.

This report will be submitted to the LEPC Information Coordinator and the SERC, not later than sixty days from the date of the exercise. The report will recommend that the SERC either Concur or Refuse to Concur with the conduct of the exercise. The SERC will then take action based on this report.

3 Exercise Concurrence. The SERC, by law, will either Concur or Refuse to Concur with the conduct of the exercise. An Order to Concur means that the SERC believes the LEPC has satisfactorily addressed the exercise requirements under the law. A Refusal means that some portion of the exercise did not adhere to the law or the SERC's exercise rules.

For Concurrence, the majority of Points within each Objective must be identified as Met.

For a Refusal to Concur, the SERC will issue such an order in one of two situations. The first condition occurs when the LEPC is directed to complete a Corrective Action Plan and they do not complete and submit such a plan. The second condition occurs when the LEPC is directed to complete a Corrective Action Plan and the plan does not adequately address the issues presented in the report. In either case, the SERC will issue an Order to Refuse to Concur. The corrective action program is designed to give LEPCs an opportunity to address and correct the Points found to be Not Met.

NOTE: The concurrence process has a direct impact on the monies received annually by the LEPC from the SERC. As long as the exercise receives an Order to Concur, the LEPC's funding will not be impacted. If the LEPC should receive an Order to Refuse to Concur, the LEPC will lose a portion of its funding in its next grant.

4 Corrective Action Program. As noted above, if the Facilitator has determined that any one Objective was not successfully demonstrated, the Facilitator will direct the LEPC to complete a Corrective Action Plan. The purpose of this plan is to recognize that certain Points were not adequately demonstrated. It then gives the LEPC a chance to identify how they can/should correct the situation.

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After receiving a notice that the LEPC is directed to complete a CAP, the Exercise Design Team and/or LEPC should review the exercise report to determine what Objectives were not successfully demonstrated. They should identify which Points were considered Not Met and review why this occurred. They should also review what recommendations the Evaluators and Facilitator made. The LEPC is encouraged to involve the Facilitator in this review so they fully understand what possible corrective actions are needed.

Points are typically identified as Not Met when a procedure is overlooked or improperly implemented. It may identify that planned procedures and/or guidelines do not reflect actual operations. It may recognize that existing equipment was not adequate to support operations or that personnel are not properly trained to use the equipment. The Point considered Not Met may simply reflect a need to emphasize training on planned procedures and/or guidelines or with equipment. The evaluation may even show that the exercise was not properly designed to adequately test a given Objective, or that too many functions were simulated instead of actually being completed. In many cases, there may be a combination of factors that caused a problem. The LEPC should clearly understand what was not accomplished and outline how they can resolve the issues.

Once the LEPC identifies and understands the shortcomings, they should take steps to correct the situation. If training is required, the LEPC should identify what courses will be offered, at what times, and who should attend. If the procedures and/or guidelines need updated, the LEPC should identify who will revise which procedures/guidelines, and when a future exercise will re-test those procedures/guidelines. If equipment is required, the LEPC should identify what resources are needed and how responders plan to obtain them. If the exercise design was at fault, the LEPC will outline how similar situations can be avoided. The LEPC may also indicate that one correction can/will actually resolve a number of issues. The LEPC must outline how these corrections are being achieved in a letter to the SERC. It must clearly identify how the issues will be resolved over the next year. At a minimum, the LEPC must address those Points considered Not Met for those Objectives that were not adequately demonstrated.

The LEPC is given sixty days to review the exercise report and submit its CAP. This will be submitted to the Facilitator who generated the original exercise report. The Facilitator will then review the recommendations made and determine if they will adequately resolve the Points considered to be Not Met. If the Facilitator believes the LEPC has identified ways to improve the local program and will implement those recommendations, the Facilitator will recommend that the SERC Concur with the exercise. If the Facilitator believes the LEPC has not taken the proper steps to address the issues or that the LEPC simply did not respond within sixty days, the Facilitator would recommend a Refusal to Concur.

The goal of this process is to identify and initiate ways to improve emergency operations. By doing so, it shows that the exercise has achieved its primary function, which is to improve the local emergency response system.

G Actual Events

1 Purpose. Actual events are a better test of local plans and procedures and provide significant cost savings. LEPCs are permitted to use an actual event to meet the annual exercise requirement. LEPCs are only permitted to use two (2) actual events within the four-

year exercise cycle. The LEPC must then complete an exercise in each of the other two years.

Credit for an actual event is given as either a Functional or Full-Scale exercise. These are hands-on events requiring response and will be evaluated in that manner. Tabletops are a discussion of events as opposed to an actual response to an event and exercise credit will not be considered.

2 Qualifications and Application. The LEPC has thirty (30) days after the conclusion of response activities to decide to request the use of the event as an exercise. After the emergency threat is contained and cleanup/recovery operations have begun, the LEPC has thirty (30) days to review the event and submit the LEPC Exercise Notice Form (Tab C).

The LEPC should consider the following when making the decision to request exercise credit for an actual event;

- Does the event satisfy the requirements for a planned exercise, either Functional or Full-Scale credit?
- Has the spilled material met the criteria of the Revised Code, section 3750.02 (B) (2) (b);

  "Establish criteria and procedures for reviewing the chemical emergency response and preparedness plans of Local Emergency Planning committees required by section 3750.04 of the Revised Code and the annual exercise of those plans and for providing concurrence or requesting modifications in the plans and the exercise of those plans. The criteria shall include without limitation, the requirement that each exercise of a Committee's plan involve, in addition to local emergency response and medical personnel, either a facility that is subject to the plan or a transporter of materials that are identified or listed as hazardous materials by regulations adopted under the "Hazardous Materials Transportation Act" 88 Stat. (1975), 49 U.S.C.A 1801, as amended."
- Did the event create an immediate impact to local drinking water, or
- Necessitate the shutdown of public facilities, or
- Require the evacuation and/or sheltering of the public, or
- Require extensive clean-up operations, or
- Involve multiple response agencies beyond the local jurisdiction

Note: Spills from "fuel tanks" should <u>not be considered</u> as they occur on a routine basis. However, fuel spills may be considered in cases when more than 100 gallons of fuel are released and the incident can adequately demonstrate the required number of Objectives for either a Functional or Full-Scale exercise.

The LEPC should next discuss which exercise Objectives were thoroughly tested by the response and choose which Objectives are to be evaluated. Before they choose, the LEPC should review the Points of Review for each likely Objective and identify that response functions *did* physically demonstrate each of the Points. If the response only briefly addressed an Objective or spent little time/effort in completing its Points, the LEPC should

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not choose to evaluate that Objective. The LEPC should only choose to evaluate those Objectives that meet the majority of Points of Review.

This LEPC should outline the major events and what resources were involved. It should describe the extent of the hazards posed to the public and the environment. To support this, the LEPC should make available for review response logs that identified response actions taken, relevant news articles and notes from any after-action critique. The goal is to provide the Facilitator enough information to understand what occurred, who responded, what actions were taken, and how the event was resolved. The second page should first check-off what agencies were involved. The Evaluator section should identify the principal Players that coordinated the response actions. For example, this should identify the Incident Commander, Safety Officer, lead law enforcement representative, etc. Suggested supporting documentation could include:

- Fire report(s)
- EPA report
- OSP report
- Newspaper articles
- Map(s) of impacted areas

The LEPC will coordinate a meeting for the Facilitator to interview these personnel in order to complete the evaluation of the event.

3 Evaluation and Concurrence. The Facilitator will complete the evaluation. To accomplish this, the Facilitator will meet with and/or interview the key response personnel. During this review, the Facilitator will question personnel how the event tested the respective Objectives. The Facilitator may choose to use phone interviews to complete this process, or may decide to meet face-to-face with personnel. If a meeting is conducted, the Facilitator may meet individually with personnel or conduct a group meeting. The Facilitator will work with the exercise coordinator identified on the exercise notice to coordinate these meetings. The meetings will be informal and are meant to see if the Objectives were Met in order to qualify for exercise credit.

Following the interviews, the Facilitator will complete an exercise report based on the observations gathered during the interviews. The report will be completed and submitted to SERC and the LEPC as would be done for any exercise. SERC will then Concur or Refuse to Concur as it would for any exercise.

H Joint LEPC Exercises

1 Purpose. Joint or regional exercises test the coordinated response to an incident by personnel from two or more LEPC districts. Some of the following scenarios identify why LEPCs may need to complete a joint exercise. A Facility may lie on or near the border of two districts, and a release would require both counties to respond to the emergency. Similarly, a transportation corridor (i.e. railroad, highway) may pose a threat that would involve multiple counties. A fire department or Hazmat Team from one district may be the principle responder in the neighboring district, and thus a response would use the resources

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from both jurisdictions. The joint exercise is then used to show how each LEPC plans to coordinate such a response and to ensure the various response procedures are compatible.

2 Pre-Exercise Considerations. To complete a joint exercise, the Exercise Design Team will need to include members from each district involved in the exercise. The design process is then the same as for any other exercise. The joint team will develop the scenario, outline the major events/expected actions, arrange the participants, and develop the simulation. There are a few situations that the joint team must understand and the following discusses those issues. The joint team should consult with the Ohio EMA Emergency Management Specialist(s) if they have any question about how to address these concerns.

The first concern will be the selection of the exercise type. The joint team should first review what exercise requirements each district needs to complete. The scenario should be developed to support those needs. This joint "needs assessment" should identify what type of exercise will adequately test those needs. The joint exercise will either be a Tabletop event or a field event. The LEPCs should not use this process when one LEPC wishes to complete a Tabletop exercise when the others will complete a Functional or Full-Scale exercise. Identification of which Objectives will be evaluated by each involved LEPC. Each LEPC can only choose to evaluate an Objective where their personnel have an active role in completing the tasks for that Objective. For example when choosing the Response Personnel Safety Objective, the LEPC's response personnel must be physically participating in the decontamination process, making entry, and/or managing the safety operations. When both LEPCs have response personnel actively involved in the Objective, both LEPCs may use that Objective for exercise credit. When the task is completed using only personnel from one LEPC, then only that LEPC may claim that Objective for credit.

Next, the joint team will need to determine how many Evaluators will be needed to evaluate the various Objectives. For those LEPCs evaluating the same Objective in the same response area, the joint team may elect to use one Evaluator to observe that Objective. That Evaluator's comments and observations will apply to both LEPCs and will be reflected in the exercise reports made to each LEPC. If the functions are completed in various areas, the team will obviously need an adequate number of Evaluators to observe those actions. In the cases when only one LEPC chooses to evaluate a particular Objective, one Evaluator is used and their findings will only apply to that LEPC. Their comments will only be reflected in that LEPC's exercise report. The joint team must clearly identify which LEPC is actively involved in completing which task and seeks to evaluate which Objective. This will determine how many Evaluators are needed.

Another concern the joint team must address is the requirement to ensure the Evaluators understand or have copies of the procedures/plans for each LEPC. If a given Evaluator observes the actions of multiple LEPCs, the Evaluator must be provided copies of the procedures and plans for each district. If the Evaluator is only observing one district, then the Evaluator only requires that district's procedures.

Finally, the joint team must complete and submit a separate Exercise Notice (Tab C) for each LEPC. The purpose of this is to identify which Objectives each LEPC will actively complete and should not identify those Objectives being completed by another LEPC. The form will also show which Evaluators are observing Objectives for multiple LEPCs versus only watching an activity for one LEPC.

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3 Exercise Conduct and Evaluation. The conduct of the exercise and its evaluation proceeds as it would for any other exercise. The joint team will act as the exercise Controllers and will carry out the exercise as planned. The Evaluators will complete their tasks as they would in any other exercise.

4 Post-Exercise Considerations. The joint team will conduct a joint critique of the exercise. The critique is conducted, as it would be for any other exercise. All Players are involved in the process. The Evaluators will share their respective insights with the entire group. The Facilitator will use those comments to complete an exercise report for each LEPC.

The LEPC's respective reports will highlight those accomplishments and recommendations as they apply to their chosen Objectives. The report will reflect which actions were completed as joint effort or were accomplished solely by that LEPC's personnel. For example when one county chooses Objectives #4-8 and another chooses #5-10, the first report will only reflect #4-8 and the second will reflect #5-10. However, both reports will note that Objectives #5-8 were completed as a joint effort.

The SERC will issue a separate Order to Concur or Refuse to Concur for each LEPC. If an Objective was jointly evaluated for each LEPC and it was determined that the Objective was not adequately demonstrated, each LEPC will be directed to develop a Corrective Action Plan because of that Objective. The LEPCs should work together to address how and why the Objective was not properly addressed and to determine how to resolve the issues. Ultimately, each LEPC will submit their Corrective Action Plan. The Facilitator will consider those plans independently and make a recommendation to SERC on whether or not the LEPC's corrective actions will adequately address the issues raised. Each LEPC will receive an individual Order to Concur or Refuse to Concur.

If the exercise was a Full-Scale exercise then there must still be a public critique. If only one LEPC requests Full-Scale exercise credit, then only that LEPC needs to complete the public meeting. If multiple LEPCs request Full-Scale credit, then they can complete a joint public meeting or conduct their own respective public debriefing. Each LEPC must ensure the Facilitator attends their public debriefing if separate meetings are conducted.

The key to joint exercises is to ensure the exercise is developed, completed, and evaluated together. Also, the joint team should ensure the established exercise requirements are adhered to. If there are any questions during the process, the joint team should bring this to the Facilitator's attention as soon as practical.

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SECTION III – STATE EXERCISES

A General Overview

At least annually, the SERC and the State agencies that are represented on it shall jointly exercise its Hazardous Materials Plan in conjunction with a LEPC exercise. They will abide by the same rules established for LEPCs to develop and conduct an exercise. After the exercise, the SERC will review and revise the State Plan as needed.

LEPCs are encouraged to participate in this joint exercise. It will allow the local community to identify how and when they will utilize State agencies to manage a local chemical emergency. Local and State personnel can practice how they interface during a response. They will learn each other's abilities and limitations to control and resolve a release. This will lead to improved plans and support during actual incidents.

B Exercise Design

The SERC's Operations and Issues Committee will take the lead for SERC to organize the annual exercise. They will solicit and identify one or more LEPCs to participate in a joint exercise. Together, the SERC and each participating LEPC will organize a joint Exercise Design Team. The joint Team will then design and develop the joint exercise.

The joint Team will follow the same procedures as addressed in Section II's discussion on Joint Exercises. The team will work to identify what Objectives the State and LEPCs wish to evaluate. Together they will identify the type of exercise to complete and the level of involvement by each group. The scenario will then be developed that most realistically tests those needs. As the joint Team develops the exercise they will need to closely coordinate who is to participating. The Team will need to control the size and scope of the event so that it does not become too large and unrealistic.

The Team will also need to focus on how they present the scenario to the Players. They need to clearly identify where exercise play will commence and determine how many exercise Controllers are needed. When it comes to choosing Evaluators, the joint Team must ensure the Evaluators understand the procedures for the LEPC they will evaluate. The same is required for those who will evaluate the State functions. They will need copies of the State Plan for the State agencies involved and the unique SOPs for the participating State agencies.

C Exercise Conduct

The conduct of the exercise should proceed as it would for any other exercise. The joint Team will act as the exercise Controllers and will see that the exercise is carried out as planned.

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D Exercise Evaluation, Critique, and Report

Each participating LEPC will need to submit a completed Exercise Notice to Ohio EMA. The Facilitator will observe the activities for the respective LEPC and submit an exercise report as they would for any other LEPC exercise. The Team will also need to identify who will act as the Facilitator to review the conduct of the State agencies.

Following the exercise, the LEPCs and the participating State agencies will complete a joint Player critique. The Controllers will need to ensure both State and Local personnel are involved. Together, they can review what steps are needed to improve coordination during a response. Evaluators for the State and LEPC should share their observations at the end of the critique.

The respective Facilitators will then gather the Objective forms needed to develop an exercise report. The State's Facilitator will complete an exercise report for the State agencies. This will be submitted to the SERC for their concurrence. The LEPC's Facilitator will complete and submit that exercise report as they would for any exercise. If an Evaluator is observing both State and LEPC play, copies of those Objective forms must be provided to the respective State and LEPC Facilitators.

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TAB A – EXERCISE OBJECTIVES IN REVIEW

1 Overview of the Exercise Objectives

The SERC's Operations and Issues Exercise Committee has developed thirteen (13) Exercise Objectives. Each LEPC will use these standard Objectives to evaluate their annual exercise. The LEPC must evaluate each Objective at least once within the four-year exercise cycle.

The Objectives were developed based on the planning criteria that the LEPC plans must address. They are designed to evaluate the knowledge and ability of those with defined responsibilities to operate within the framework of the LEPC plan and their agency's SOPs. The thirteen (13) Exercise Objectives are:

#1 Notification of Response/Support Agencies

#2 Incident Assessment

#3 Incident Command

#4 Emergency Operation Centers

#5 Resource Management

#6 Communications

#7 Response Personnel Safety

#8 Population Protective Actions

#9 Emergency Public Information

#10 Traffic and Access Control

#11 Shelter Management

#12 Emergency Medical Services

#13 Medical Facility Services

2 Review of the Individual Exercise Objectives

To better understand each Objective, this Tab provides a review of each Objective's exercise intent and focus. The discussion is broken down into four parts: **Basic Intent**, **Discussing the Points of Review**, **Exercise Design and Control Issues**, and **Evaluation Needs and Issues**.

The **Basic Intent** section states the established definition for the given Objective. The section further clarifies the purpose and scope of the Objective and thus may even identify the unique laws, standards, training, or procedures that apply to the Objective.

The **Discussing the Points of Review** section lists each Point of Review for the given Objective and then provides insight as to what response activities should be accomplished for a given Point. The section should identify:

- What is the basic intent or focus of a given Point?
- What response procedures and/or guidelines should be accomplished to meet each Point.?

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It is important to note that the comments provided <u>are not</u> the only techniques in which a Point can be demonstrated. There can and may be other ways in which to accomplish a given Point. These are only suggestions to give the Exercise Design Team, Players, and Evaluators insight on how the Points can be Met!

The **Exercise Design and Control** section addresses the various concerns an Exercise Design Team should consider when developing the exercise. The section will address:

- What Exercise Types should <u>or</u> should not be used to test the given Objective
- How to control discussions when testing in a Tabletop exercise
- How to setup for Functional or Full-Scale exercises
- What techniques should be used to keep the exercise Objective on track
- How to avoid too much simulation of response activities for the Objective

Finally, the **Evaluator Needs and Issues** section provides guidance on how to evaluate the given Objective. This will include guidance on:

- What agency/person is best suited to be an Evaluator for a given Objective
- Whether or not more than one Evaluator is needed to evaluate an Objective
- Where to locate Evaluators so they can fully observe the exercise
- Which Objectives are best suited to be evaluated along with a given Objective

As a reminder, no Evaluator should be observing more than two Objectives during an exercise.

3 <u>Conclusion</u>

In developing an exercise, the Exercise Design Team must review the following pages to ensure they produce an exercise that fully tests each Objective. Without understanding what is to be tested and how it should be tested, the exercise may fail to accomplish its intended Objectives. Exercise participants should not be penalized for having to take part in a poorly designed drill. The Exercise Design Team should also work with their SERC Facilitator to review and understand how to draft a scenario so that it fully tests the chosen Objectives.

Meanwhile, exercise participants are encouraged to review this section *before an exercise*. They should understand the criteria that is being used to evaluate how they implement their local procedures and/or guidelines. Participants may even find tips in this guidance that they can use to revise their existing SOPs or they may recognize a need to conduct additional training before the exercise.

Finally, Evaluators should review these pages *in advance* so they have a better perspective on what to look for while evaluating the Objective. This is especially important for Evaluators who have never been involved in a LEPC exercise. The Exercise Design Team should provide copies of these pages to the Evaluators prior to the exercise. The SERC Facilitator will also meet with the Evaluators prior to the exercise and clarify any questions they may have about the Objectives or the individual Points.

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Objective #1	**Notification of Response/Support Agencies**	Demonstrate, or discuss in a tabletop exercise, the ability to notify response and support agencies, and to mobilize emergency personnel.

A Basic Intent

This Objective addresses the ability of dispatch and/or response personnel to receive notice of an incident and promptly mobilize response and support personnel.

B Discussing the *Points of Review*

1. *Were local procedures and/or guidelines followed to document the incident call and to determine if hazardous materials were involved?*

Facility and/or transporters are required to notify the local fire department and the LEPC's Emergency Coordinator (within 30 minutes) when they have an incident. This notification provides specific information about the release and the associated hazards. Personnel receiving the call must be ready to gather and forward this information to First Responders and key support agencies. If someone calls in the accident other than the spiller, personnel need to be cognizant of signs that a hazardous material may be involved. This information should be documented and passed along to the initial responders. Awareness level training also teaches First Responders to recognize when hazardous materials are released and to notify the appropriate agencies as per the local plan. As information is obtained, it should be documented and relayed in accordance with those procedures and/or guidelines. Along these lines, some plans or SOPs will utilize a special form to gather and record information about a chemical incident. NOTE: Local procedures may include, but are not limited to, County Haz Mat Plan, County Emergency Operations Plan, Agency Standard Operating Guidelines.

2. *Were appropriate local personnel (i.e. HM Team, Fire, Police, Medical Facility, and EMA) dispatched and/or notified of the hazardous materials emergency?*

At a minimum, the local Fire Department and Law Enforcement agencies need to be notified. Dispatch offices should have current emergency contact lists or plans that identify who to call during a chemical spill. Communities may have pre-determined what assets will be dispatched to a chemical incident. Some plans actually outline a tiered notification system (levels I, II, and III) in which agencies can be quickly dispatched based on the size and scope of the incident. This system alerts responders as well as support agencies such as the American Red Cross (ARC) and/or local medical facilities. Local mutual aid agreements may require a specific agency (i.e. Chemtrec, Hazmat Team, and toxicologist) be notified anytime chemicals are involved in an incident. As a minimum, the local Fire Department and Law Enforcement agencies need to be notified. Also, the local plan may dictate that other agencies such as the local emergency medical facility, EMA, ARC, etc. will be notified at the onset of a chemical release. Dispatch offices should have current emergency contact lists or plans that identify who to call during a chemical spill.

3. *Were appropriate state and federal agencies (i.e. OEPA, SFM, ODH, PUCO, NRC, Chemtrec, and USCG) notified and requested to provide support for the hazardous materials emergency?*

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As a minimum, the OEPA's Emergency Spill Response Office and the National Response Center (NRC) will need to be notified by the spiller. The IC should ensure those calls were made. However, local communities may also need to contact those agencies for response support or technical assistance. The local community should have pre-planned what assistance they will call upon from various state and federal agencies. For example, OEPA provides an On-Scene Coordinator (OSC) to coordinate activities for hazardous substance releases that impact the environment. Meanwhile, the SFM's Arson Bureau may provide response guidance when explosive materials have been released and Ohio Department of Health (ODH) can provide support when radioactive materials are released. The PUCO's Transportation Dept. can provide field liaisons for technical and investigative assistance during transportation incidents. Federally, Chemtrec can be used to gain information about transporters who have a hazardous materials release.

Note that most of these agencies can provide support during exercises *if requested in advance*. Consult the local plan, the State EOP and/or the National Response Framework for more information on state/federal response roles.

4. *Were the notifications made in a timely manner?*

The question of whether or not notifications are made in a timely manner may be somewhat subjective. If a call was delayed, the Evaluator will need to distinguish if other activities took precedence over the call or if the notification was simply overlooked. Also, the notification does not stop after the first units are dispatched. As the initial size-up of the scene is completed, the IC will need to advise dispatchers on the incident status and who to alert next.

5. *Was adequate information about the scene's assessment provided to the response and support agencies when notified?*

As personnel begin to complete an initial scene assessment, relevant portions of that information should be relayed to dispatchers, to those being sent to the scene, and to the off-site agencies supporting the response. This will give them some lead time to research the hazards by consulting DOT guidebooks or obtaining technology-based computer-based information. It will also give certain support agencies (i.e. medical facilities, ARC shelter officials operators, EOC staff) enough *lead time and information* to properly set up their support operations. The IC working with dispatcher should ensure that when agencies are first alerted they are given preliminary information about the incident.

6. *Were the actions taken based on existing plans and/or operating procedures?*

Procedures to document the initial call and make subsequent notifications are required to be part of the LEPC plan. These procedures may also be spelled out in agency SOPs such as at the 9-1-1 center or separate dispatch locations. Separate procedures and/or guidelines should be coordinated so they do not have multiple agencies making the same notification.

C Exercise Design and Control Issues

Since this Objective is fairly straightforward, there are only a few issues to address when it comes to the exercise design and control. The design simply requires a scenario. In fact, the scenario can be as detailed or vague as the Exercise Design Team wishes. The initial call will generate a response sufficient to evaluate activities.

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For Tabletop exercises, the Exercise Design Team will simply need to have a dispatcher participate and address how procedures are implemented. If more than one site dispatches, the Exercise Design Team should invite personnel from each location to participate. And in this case, the exercise may be able to identify and clarify differences in dispatch procedures.

For Functional and Full-Scale exercises, there will need to be sufficient dispatch personnel available to manage the exercise and still handle the normal/real emergency calls. Also, the Controllers and dispatchers should be briefed as to how/when to call-off the exercise or put it on hold should a real emergency require the dispatchers' full attention. Next, dispatchers and responders will need to be briefed on what assets can/will be called versus which agencies will only require a simulated notification. This is equally important for agencies that are called for technical information such as OEPA or Chemtrec. If this type of asset is not playing and responders require the technical information, Controllers will need to be ready to answer and provide the requested information.

D Evaluation Needs and Issues

To evaluate this Objective, the Evaluator needs to be someone who understands the local dispatching process. The person can be either a local responder or someone from within the dispatching service.

This Objective is typically evaluated at the central dispatch facility. This is the easiest location from which to observe the various Points of Review. If more than one dispatch facility is likely to be used, there should be an Evaluator in each dispatch location. If the Exercise Design Team chooses to evaluate this Objective from the scene, the team will need to provide the Evaluator(s) with a means to monitor the notifications. This can be complicated if resources are alerted on multiple channels or via methods other than radio. In either case, the Evaluator(s) will need to be briefed on which assets will be participating, in what order they are likely to be alerted, and by what method they are notified. This will allow the Evaluator(s) to objectively evaluate if planned procedures and/or guidelines were followed or not.

This Objective is well suited to be evaluated along with Objective #6, Communications.

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Objective #2	**Incident Assessment** Demonstrate, or discuss in a tabletop exercise, the ability to identify the hazardous material(s) involved in the incident and to assess the associated health and physical hazards.

A Basic Intent

The ability to recognize that chemicals are present and then determine how they will harm personnel is the focus of this Objective. Responders should have received Awareness Level Hazardous Materials training which teaches them how to recognize the presence of chemicals. Personnel with Operations Level training will determine what physical and health hazards are associated with the released materials. Responders will show how they use this information to develop an action plan and safely implement protective actions.

B Discussing the *Points of Review*

1. *Did response personnel safely approach the incident scene?*

When initially notified of a chemical release, personnel must make their approach safely and avoid pulling up next to the incident. Typically, approach is uphill and upwind, or as identified in local procedures and/or guidelines. If the initial call does not include the mention of hazardous materials, personnel need to recognize the hazards *and* move to a safe location.

2. *Were proper steps taken to safely obtain information about the material(s) involved before committing resources and beginning response operations?*

Once on-scene, First Responders need to identify the scope and nature of the hazards involved. This should include identifying/gathering the following information:

- Type of container or package involved
- Extent of damage to the container
- Use placards or labels to identify materials
- Physical state of materials (gas, liquid, solid/powder)
- Quantity of materials being released or likely to be released
- Materials involved or exposed to other hazards (fire, other chemicals)
- Shipping Papers, Manifests, Bills of Lading, Waybills, SDS, etc.

3. *Did personnel consult proper technical guidance/resources to obtain relevant information about the hazards involved?*

Response personnel are initially trained in and need to show their ability to use USDOT's North American Emergency Response Guidebook (NAERG). However, the NAERG provides only initial guidance and should be supplemented by more technical guidance. This technical assistance can come from any number of sources such as computer technology-based programs (i.e. Cameo), shipping papers, MSDS, pre-planned hazard analyses, chemical handbooks (i.e. NIOSH pocket guide, or chemical specialists (i.e. Chemtrec)). Assistance can also come directly from the spiller or company that uses the material, or from the local medical facility and/or health department.

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4. *Did personnel identify the potential movement and impact posed by the released materials on-site and to adjacent areas?*

Movement of the material and its physical/health hazards will dictate what impact is posed. If the material is a gas or gives off a gas as it evaporates, the gas may be toxic or may displace oxygen. It might be flammable or explosive. Responders should note how far a gas may move downwind and determine what locations may be at risk. Solids or liquids may not travel far but can pose an absorption and ingestion hazard if they come in direct contact with personnel. Responders should also consider the impact to the environment such as how it may contaminate nearby water sources or threaten animal and vegetation life.

5. *Did personnel use the assessment to identify proper response actions to be taken?*

Before committing any resource or taking a response action, responders must determine what actions they can safely implement. The assessment should identify the most prudent means of managing the release *based upon training and equipment*. Responders must identify what resources (such as PPE, absorbents, and neutralizing materials) are necessary to implement the necessary response actions. This may include such decisions as determining what can/will be done until the identified resources arrive on scene. Will the response actions be offensive or defensive in nature? Offensive actions might require that a remote valve be accessed and turned off. Conversely, it might be determined that the safest course of action is to let the material dissipate or burn off. Defensive actions might require the use of Operations-Level Responders who are trained to control the spread of the material (dikes, vapor suppression, etc.). Technician Level Responders are trained to implement defensive actions aimed at stopping the release of the material (plugs, patches, repairing valves, over-packing a drum, etc.). Review NFPA's 471, 472, and 473 for more guidance on response actions and associated training competencies.

6. *Did personnel use the assessment to properly develop protective actions for the public and the environment? Was consideration given to the development of protective actions for the public and the environment based on incident assessment?*

The likely protective actions include evacuation, or sheltering-in-place, or a combination of the two. Responders need to consider the benefits and limitations of each method in order to identify which technique will best minimize the hazard's effect. A toxic cloud may disperse before an evacuation can be organized, or it may linger and thus expose each person as they evacuate. Sheltering-in-place may have people trapped in their homes with no heat or air conditioning thus creating other medical emergencies.

7. *Was the incident assessment transmitted in a timely manner to other response personnel and support groups?*

Personnel on-site and off-site need to know what hazards are present. On-site, the IC or Safety Officer must brief personnel on the signs of exposure, the wearing of protective equipment, and the short and long-term health effects. Off-site, medical facilities will need this information so they can protect their personnel and equipment. Shelter Managers will also need this information to screen evacuees for signs of exposure and to prevent contamination of the shelter.

8. *Were proper strategies/tactics used to continuously assess and monitor the hazards?*

The hazards posed will change as the incident progresses. As such, the IC or Safety Officer

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must show how they will identify when/if significant changes occur in the hazards posed. Personnel with Operations-level training should be able to demonstrate the effectiveness of the defensive actions in-place and whether or not it is more prudent to withdraw further from the scene. HM Technicians, if available, should demonstrate the ability to estimate the likely size of the endangered area using computer modeling or monitoring equipment. They should also be able to predict the likely behavior of the materials when they mix. If local assets cannot fully monitor the situation, they should be able to consult with technical experts such as those provided by the spiller, via OEPA's OSC, or other specialists. This assistance should be pre-planned for the hazards in the community. Meters can be utilized to continually assess the incident.

9. *Were changes in the incident assessment transmitted in a timely manner to other response personnel and support groups?*

As changes are identified, groups on and off-site supporting the response must be briefed. The changes may be either an escalation or de-escalation of the hazard, or may be a change in the protective actions. Most often, off-site entities (medical facilities, traffic and access control points, shelters) are not kept informed of the changes.

10. Were the actions taken based on existing plans and/or operating procedures?

By law, LEPC plans shall contain the methods and procedures to implement this process. Also, some response agencies may have outlined this process in their own SOPs.

C Exercise Design and Control Issues

To effectively test this Objective, the scenario must be clearly presented to the Players. The scene must resemble an actual incident as closely as possible, otherwise they may respond to the incident differently than intended. There should be sufficient "clues" present to determine what hazardous materials are involved and to fully analyze the situation. Typically, these clues should be presented or accessible based on the responder's training and equipment capabilities. Do not hide or make clues difficult to discover unless the ultimate goal is to challenge the local responders or to have them incorporate specialists into the response mechanism.

For Tabletop exercises, the exercise Controller will need to "verbally" setup the scene as it would typically be seen when the first person arrives. The Controller will then input or share "clues" about the scenario as Players make their inquiries. Players should not have to make assumptions about the scene setup. Players should be told in advance to bring any reference materials that they normally would consult during a response. This would include but not be limited to the NAERG. If computers or chemical reference books are used, they should be brought and used during this exercise. If the Players would call upon an outside specialist/agency, that specialist should also be invited as a Player in the exercise. If they cannot participate, the Controller will have to be ready to input the information that the specialist would have provided. The key here is that the Controller should not "give away" the scenario until sufficient time and effort is expended by the Players in analyzing the situation. The Controller must also avoid walking Players through the assessment.

For Functional and Full-Scale exercises, the scene will need life-like props that fully simulate the release (i.e. smoke, flowing liquids, shipping papers, placards, etc.). The scene should look as real as possible. Controllers should be in-place and prepared to clarify what the incident scene is

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in case responders are confused by its setup. For example, the green dye in the pond is actually an oily sheen, or the fire truck with a placard is really a 30,000 gallon tanker, or there is a smell of almonds in the air. Controllers will also need to provide feedback on equipment readings or the effectiveness of response actions. For example, a Lower Explosive Limit (LEL) meter shows .2 parts-per-million (ppm) at 100 yards and 20 ppm at 50 yards, or a "damaged" valve will not close even though it does.

Ultimately, there should be enough Controllers to monitor the exercise and input clues where needed. Thus, this Objective may need a Controller to follow entry personnel into the hot zone while another sits with the research team, and the Lead Controller stays within the Incident Command Post. The Controllers will need to be ready to act as simulated agencies (non-participating but would likely participate in response to an actual incident) by providing input messages.

D Evaluation Needs and Issues

Evaluators for this Objective need to have a good Hazmat response background. They should be trained to at least the Operations level and preferably to the Technician level. These Evaluators should typically come from the Fire service or a Hazmat Team.

During the response, the Evaluator should observe the on-scene arrival of First Responders. The Evaluator should join those responders and listen-in to their evaluation of the scene. To assist an Evaluator, the Exercise Design Team may wish to furnish the Evaluator a radio that can monitor the information coordination process between the ICS organizational elements (sections, branches, groups, divisions, etc.). Throughout, the Evaluator should float between the Command Post, the hot zone with the entry team, and the hazmat operations area to effectively see how the assessment is made and coordinated. If the scene is complicated, it would be beneficial to use two Evaluators for this Objective (i.e. one in the hot/warm zones and the other in operations or the Command Post).

Also, this Objective should not be evaluated from within an EOC. An EOC may support the assessment process, but this Objective must be accomplished by those on scene.

This Objective is well suited to be evaluated along with Objectives #3, 7, or 8.

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Objective #3	**Incident Command** Demonstrate, or discuss in a tabletop exercise, the ability to implement an Incident Command System and effectively direct, coordinate, and manage emergency response activities.

A Basic Intent

OSHA's Hazwoper standard (1910.120(q)(3)(I)) notes that the "senior official" on-scene will control the emergency with a site-specific Incident Command System (ICS). Ohio law (ORC 3737.80) notes the chief of the fire department or their designee is responsible for primary coordination of the on-scene activities. Therefore, this Objective will look at how responders implement a command system. It will also note how well other agencies work within and understand that command system. Please note that the phrase "incident command system" may also be referred to as an "incident management system" or "unified command system".

B Discussing the *Points of Review*

1. *Was an Incident Command System (ICS) clearly identified?*

Incident command begins as the first piece of equipment arrives on-scene and it expands to meet the needs of the incident response. ICS positions should be assigned as the situation requires (i.e. Operations, Decon, Staging, Logistics, Medical, and PIO). It should be noted that OSHA requires a Safety officer be designated for every Hazmat incident. Liaisons from outside agencies (i.e. law enforcement, EMA) should also be included in the command system as required.

2. *Was the Incident Commander (IC) clearly identified and effectively in charge?*

The senior fire official who is first on-scene will become the IC. The IC will need to clearly establish the response priorities and then delegate the functional responsibilities to responders. Once the functions are delegated, the IC's job is to coordinate activities and not get involved with the individual "hands-on" assignments. The IC should remain within the Command Post and be easily accessible to the command positions. This point also evaluates the effective coordination required when a unified command system includes multiple "lead" agencies at the Command Post.

3. *Was a Command Post (CP) established and clearly identified?*

The size and actual location of the Command Post will depend on the incident. Small incidents may be controlled from the front seat of a vehicle while larger incidents may utilize a formal command vehicle. Its location should also allow easy access for key personnel working in the cold zone but remain isolated from outside distractions (media, the public). Some departments use techniques such as posting green lights/flags to identify the CP. The CP must be able to communicate with agencies that are both on-site and off-site. Liaisons coordinating off-site activities should also be located within the CP environment.

4. *Was the Command Post staffed and equipped to support emergency operations?*

Staffing the Command Post depends on the incident size and complexity. For most incidents, the IC will need a liaison from the external or support agencies that are coordinating actions off-site. These liaisons typically include law enforcement for traffic control, public information

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officers for media/public relations, and possibly an EMA official for logistical support. The CP staff may include the spiller so they can provide input on how to control or cleanup the release. In larger incidents, the IC should have administrative support to document actions taken, manage communications, and account for resources on-site.

5. Was decision-making and information sharing coordinated with on-site personnel?

The IC needs to ensure personnel are in the information loop. The IC should be in regular contact with command positions who in turn keep individual personnel informed. The command positions will provide feedback back to the IC as to what actions are completed and what additional actions or resources are needed. Significant changes (i.e. the spill worsens, all victims are rescued) should be immediately shared with the IC. This will allow the IC to set new response priorities or modify protective actions off-site.

6. Was decision-making and information sharing coordinated with off-site agencies?

Off-site agencies (i.e. medical facilities, shelters, EOC, etc.) need to receive information about what actions are taking place on-scene and how they are supposed to support operations. These groups may need to re-prioritize their actions (open a new shelter, establish new traffic detours) and thus need information at the onset of the emergency as well as throughout the event. At the same time, these agencies need to keep the IC informed of the actions completed off-site. The ultimate goal is to ensure response actions are not overlooked, duplicated, or thought to be still in progress. The IC may accomplish this coordination for small incidents or they can delegate that task to specific liaisons or command positions.

7. Did the command staff identify consider the need to activate an Emergency Operations Center?

The goal of the ICS is to manage the on-site activities. If the IC believes the *off-site* events are distracting from his/her ability to effectively manage the *on-site* events, the IC should request the activation of an EOC. Typically, county plans rely on the local EMA Director to coordinate with the IC and decide where/when to activate an EOC. EMA offices may activate an EOC prior to receiving a formal request to do so. In this case, the EOC should ensure the IC knows this has occurred. An EOC should then coordinate off-site activities and to support the IC's logistical needs. Typically, county plans rely on the local EMA Director to coordinate with the IC and decide where/when to activate an EOC. It should be noted that some EMA offices are proactive and may open an EOC before the IC formally requests one. In this case, the EOC must ensure the IC knows this has occurred and then take its direction from the IC. The IC needs to demonstrate how it was decided whether or not to activate an EOC. If an EOC is not required, the IC should be able to clearly explain the reasoning as to why the EOC was not needed.

8. Was a system implemented to track personnel and resources on-site?

The IC shall limit the number of personnel at the site, especially in those areas of potential or actual chemical exposure. In order to accomplish this, the IC should have a system in-place that identifies who has been assigned to work in which areas. Also, the IC should use this system to identify when to obtain additional or replacement personnel (EMS squads, traffic controllers) and equipment (absorbents, SCBA). The system should also show when a given asset was released from service on-site.

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9. Were records kept to document the response actions taken?

A running record of *key* actions taken and decisions made should be maintained. This task may be accomplished in the Command Post or by each functional commander (Safety, Operations, etc.). These notes can be used to see that tasks are completed and not overlooked, or to re-define response needs. They can be used to see that required calls were made or that needed assets were mobilized. As the incident comes to a close, the command personnel can use the notes to address issues such as cost recovery, equipment accountability or replacement, and accident investigation.

10. Were the actions taken based on existing plans and/or operating procedures?

The LEPC plan is required to address these concerns. Further, NFPA's 471, 472, and 473, 1500 and 1600 standards discuss the merits of an incident command system and how it should be applied locally. Meanwhile, local departments should have already completed incident command training as per OSHA. Also, individual departments should have addressed these Points in their own SOPs or in a common system used by all departments in the county.

C Exercise Design and Control Issues

This Objective typically does not require any special design considerations. The only limiting factor here is manpower. There must be adequate personnel available to do the hands-on tasks or fill out the command structure so one person is not trying to accomplish every task. To properly setup a scenario and identify manpower needs, the Exercise Design Team should include a responder who is trained in incident command.

It is noted that OSHA requires anyone likely to take charge of a Hazmat response to have had IC training. Therefore, the senior fire officials should have had this training and should be able to adequately manage the exercise. In fact, many exercises like to use the junior officers to manage the exercise and give them a chance to implement an ICS.

For Tabletop exercises, Controller input is usually needed only to make sure one person does not dominate the conversation. The lead agency should have ample Players attend so they can fulfill the likely command positions and discuss the tasks their personnel would implement. The Controller may have to prompt discussions between positions until a natural flow progresses.

For Functional and Full-Scale exercises, an exercise Controller should be assigned to the Command Post to oversee the flow of events. Additional Ccontrollers may also be needed for individual commanders to assist general staff (section chief(s)) as the scene grows in scope and complexity. They will need to clarify what the incident scenario is, what hazards are being simulated, and what tasks personnel must accomplish. For example, they will clarify that the green smoke is not a fire, and the closer you get to the incident the more suffocating the odor becomes. The Controllers will also need to let the IC, or the other officers, know when a response action does not work. The Controllers must avoid becoming too involved in the exercise otherwise they begin managing personnel and the exercise.

As a side note, LEPCs should refrain from using the same fire department in each exercise to test this Objective. Other departments need a chance to evaluate how their personnel manage a response. The Exercise Design Team needs to ensure each local fire department has a chance to be evaluated under this Objective. They can design exercises that allow EMS and Law

Enforcement officials to arrive on-scene first. They will have to implement a command system, eventually transfer control to fire personnel, and possibly setup a unified command system.

D Evaluation Needs and Issues

The Evaluator for this Objective needs to be trained in Hazmat operations and Incident Command. It is recommended that this evaluator be trained in ICS 300 & 400 and Haz Mat Operations. One technique is to use a senior fire official from a neighboring department as an Evaluator. Such a person will be familiar with the local fire procedures and should give an objective evaluation. Another option is to use a fire official from a nearby county as their feedback will likely be unbiased toward local opinions and may provide responders insights on techniques not used or considered locally.

For field exercises, the Evaluator will initially need to be located in a position to observe as the first pieces of equipment arrive and establish command. The Evaluator can observe how junior or non-fire personnel first manage the scene, and then observe how they transfer command to senior fire officials. The Evaluator will shadow the IC throughout most of the exercise, but also needs to observe those who were assigned various command positions.

As this activity may be accomplished away from the IC and CP, the Evaluator will need to stay alert as to who is doing what and ensure they can observe each Point. The Exercise Design Team should consider providing the Evaluator with communications equipment so they can listen in the coordination going on between the various command positions. The Exercise Design Team may also decide to use multiple Evaluators to watch the interaction among the various ICS organizational elements (sections, branches, groups, divisions) that have been assigned to deal with law, fire, medical, or health tasks.

This Objective is well suited to be evaluated along with Objectives #2, 4, 5, 6, 7, 8 and 9.

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Objective #4	**Emergency Operations Center** Demonstrate the ability to utilize an Emergency Operations Center (EOC) to coordinate and support emergency response activities.

A Basic Intent

In accordance with ORC 3750.20.78, an EOC, as identified in the LEPC plan or the County EOP, must be tested once every 4 years. An EOC is mobile, virtual, or a fixed facility where agencies gather to support the response needs of one or more incident sites and to help coordinate the actions of various off-site organizations. An EOC is commonly activated during a large-scale emergency or a widespread disaster. Each county typically has one location that is designated as the main or primary EOC, and they may have designated a number of sites as possible alternates. These sites are identified in the LEPC plan or the County EOP. This Objective looks at the activation and functional use of such a site and its ability to support field operations.

B Discussing the *Points of Review*

1. *Were planned procedures and/or guidelines followed for activating the EOC?*

The decision to activate an EOC is made in coordination with between the EMA Director, or designee, and the IC(s). Each county's LEPC Plan or Emergency Operations local Plan (EOP) should identify who activates and who staffs the EOC, what equipment is available and setup, and how the site EOC is to be operated. Some plans require the full-activation of an EOC regardless of the incident. Some plans establish varying levels of activation and staffing based on the type and size of the incident. In any case, the EOC should be staffed with those agencies that can coordinate actions for the IC(s) and off-site agencies. This includes but is not limited to response agencies, human service groups, utility services, voluntary organizations, and elected officials.

2. *Was the activated EOC either the Primary or Alternate EOC as identified in the plan?*

EOC locations need to be pre-planned. Typically, counties have one primary EOC and may have one or more alternate sites. Again, this function may be a mobile or virtual concept.

3. *Was an individual clearly identified and effectively in charge of the EOC?*

Once activated, the county EMA office is *typically* responsible to operate and coordinate the actions within the EOC. However, partners from other disciplines, or jurisdictions, may act as the EOC Manager as is operationally necessary. Per local plans, Tthis is usually done in conjunction with the EOC's "executive group" or the chief elected officials for the affected area.

4. *Were communications established between the EOC and the incident site(s)?*

This is one of the EOC's essential functions. In order to coordinate decision-making, the EOC must establish and maintain communications with the field and support agencies. For example, EOC members *must* have direct communications with their respective agencies in the field. The primary EOC must have dedicated telephones and radios in place. Alternate EOC should have some equipment in-place, but responders may have to bring portable

communications gear to the site in order to make it operational. This may include positioning a communications van at the alternate site or arrange with private vendors to supply temporary equipment. An EOC may also rely on dispatch centers or amateur radio groups to serve as the communications link between the scene and the EOC.

5. *Was decision-making and information sharing effectively coordinated between the key staff within the EOC?*

Comment [AMS1]: KEEP!!

These are essential functions of an EOC. The EOC's representatives may individually track actions and needs for their particular service, but they must also work together to coordinate the overall issues and resource needs of the field. Therefore, EOC representatives should be situated so they can readily gather and share information, set response and recovery priorities, and coordinate actions.

6. *Was decision-making and information sharing effectively coordinated between the EOC and the incident commander(s)?*

This is an essential function of the EOC. The incident commander(s) will establish the response priorities and notify the EOC for support as needed. EOC members should address and organize that support in a prompt manner. If no input is received from the field, EOC members may need to query the IC or one of the field liaisons to identify what support is needed. EOC members should also try to anticipate what resource needs or response problems may arise. In turn, they should discuss those concerns with the CP to see if those issues have been or should be considered.

7. *Were the necessary authorities (not represented in the EOC) readily available and effectively coordinated with in order to implement emergency actions?*

The EOC should be staffed so that it insures all response and support needs are being addressed. The EOC should also be large enough to accommodate the pre-planned staffing needs. But when key personnel are not at the EOC, the EOC staff must show they can compensate for those missing personnel or physically coordinate with those personnel at their alternate location. For example, if the Health Dept. cannot send a representative, then either another EOC member must show they can effectively resolve Health Dept. concerns or the EOC can coordinate issues directly with/to the Health Dept. office. The County plan will identify who staffs an activated EOC.

8. *Were copies of local plans, SOPs, and/or technical guidance readily available at this location and reviewed (when needed) in support of EOC operations?*

These are essential tools of an EOC. The EOC should have copies of local plans and procedures readily available, or the individual agencies may bring their own. Some plans contain forms used only in a disaster such as emergency proclamations, sample emergency alert messages, or damage assessment forms. Also, EOC members may use these plans to review procedures and thus anticipate response needs. The EOC should also have access to various technical guides. These guides may include computerized programs, chemical handbooks (NAERG, SDS), facility reports/plans, resource databases, county/city/utility service maps, etc. These tools help determine how to best implement or resolve a response issue.

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9. Did the facility EOC, its equipment and displays, support EOC operations?

To support operations, the EOC must be equipped to carry out its essential functions. The EOC must have sufficient tables, chairs, and workspace available so as to establish an organized work environment. It must have administrative tools such as paper tablets, pens and pencils, staplers, etc. Dry-erase, chalk, or cork boards need to be available along the walls to allow personnel to display critical information. EOC staff should have pre-scripted forms to document and track essential information. Ideally, the EOC can be equipped with a computer network/connectivity that allows members to electronically document, print, send, and receive, post and monitor incident related information. The technology in the EOC should support these functions. A must is to have copiers and fax machines readily available. Televisions and am/fm radios need to be available to monitor local media reports in order to identify and dispel rumors/misinformation. Alternate power and lighting should also be available at the EOC site. These are essential tools for an EOC.

10. Were records kept to document the actions taken within the EOC?

Each EOC member should maintain a log of actions taken, communications made, and issues resolved. This working ledger will help ensure response issues are being addressed or will act as a reminder as to what actions still must be accomplished. Also, the EOC Controller should have a way to show what key events have occurred. This can be shown on one main status board or by sharing the individual event logs. After the incident, this documentation can be used to critique EOC operations and in turn improve its operational procedures.

11. Were the actions taken based on existing plans and/or operating procedures?

The LEPC's plan is required to address the procedures and/or guidelines to open, staff, equip and operate an EOC. If the LEPCs plan is a stand-alone plan, it should refer to the section within the County EOP that covers these procedures. These procedures and/or guidelines may be located in the County EOP. The LEPC plan shall clarify how and when an EOC is utilized for chemical incident. It is recognized that the majority of chemical incidents will not require an EOC's activation. But when the event is widespread or occurs along with another emergency (flood, tornado, terrorist act), an EOC will be useful.

C Exercise Design and Control Issues

The LEPC must activate and evaluate an EOC during a hazardous materials exercise once in the four-year cycle per OAC 3750-20-78. **A Tabletop exercise will not fulfill the requirement of OAC 3750-20-78 since Tabletops do not physically use equipment.**

The EOC may be either the Primary or Alternate EOC as *defined in the plan*. This will allow local counties to test those alternate sites that have not yet been tested under simulated or real-life circumstances. The goal remains to "physically" test the principal functions of an EOC facility, its equipment, and its personnel. Note that a Tabletop exercise will only review procedures but will not test the "functional" capabilities of the EOC. Therefore, Tabletop exercises cannot be used to meet the EOC activation requirement.

To adequately test this Objective, the scenario must be severe enough to warrant the activation of an EOC. As a stand-alone Hazmat incident, the scenario must be one that makes managing the event solely from the scene nearly impossible. Such a scenario could be a release that forces the evacuation of an entire city and large numbers of victims that are contaminated or

injured. The other option is to have more than one emergency in progress to include a chemical release. Such a scenario could involve a natural or man-made emergency that impacts numerous townships in the county to include one or more chemical releases that were caused by the initial disaster.

Another key concern that the Exercise Design Team must address is that the activated EOC should be fully staffed and equipped. The exercise should not rely solely on the two-three people that may work in the EOC on a daily basis. The EOC must be staffed with the appropriate personnel (i.e. Fire, Police, Health, Medical, etc.) who will coordinate the response efforts including elected officials as designated in the plan. When testing this Objective along with Initial Notification, the staff should not be staged in the EOC. They need to be contacted as per the notification process in the EOP or EOC SOP. As for equipment, all EOC equipment needs to be operational in Functional and Full Scale exercises. This includes but is not limited to activating dormant phone lines, and coordinating the use of existing radio networks. If outside equipment is brought in to supplement day-to-day supplies, arrangements must be made and used to mobilize those assets. The Exercise Design Team should not simulate the staffing or equipment; otherwise, the Objective is not being fully tested.

A Tabletop exercise of an EOC's operation will be a bit more complicated than a similar exercise for other Objectives. For the others, a Controller simply defines an emergency and lets the Players unravel the scenario and how it is to be managed. For an EOC discussion, the Controller will not only have to explain the emergency but also will have to input numerous field response needs for the EOC to react to and resolve. Thus, the Exercise Design Team must fully script out the scenario, the expected actions for each agency, the problems they will encounter, and the resources that will be activated. The Controller will then play the multiple roles of those who responded to the emergency and will input their response needs to the EOC. Thus, the scenario needs to be more elaborate than a normal Tabletop exercise and the Controller must be knowledgeable of multiple agency response capabilities to facilitate the discussion. **NOTE: A Tabletop exercise will not fulfill the requirement of OAC 3750-20-78 since Tabletops do not physically use equipment.**

In a Functional exercise, the Exercise Design Team can test an EOC in one of two ways;

- An EOC-only exercise using only messages to simulate field play (similar to a Tabletop exercise), or
- In conjunction with actual field play with limited simulated messages (similar to a Full-Scale exercise).

Using the first type of Functional exercise, all field and external agency information is simulated as done for a Tabletop. In this case, the Exercise Design Team will use multiple Controllers to act as the IC, medical facility, shelter, and any other key agency that is on-scene or actively involved outside of the EOC. These individuals should be situated in a separate room so they can input messages through real phone and radio communications. This exercise will allow EOC Players to fully utilize the equipment in the facility and coordinate decision-making with the field (via the Controllers) in a real-time setting. The Exercise Design Team will need to lay out the scenario and the relevant expected actions (messages) so the individual Controllers input the problems in a realistic setting.

The second Functional type allows the EOC to be activated and used in concert with actual field play. In this case, the EOC takes all of its direction from the field and would be run just like a Full-Scale (see below).

In a Full-Scale exercise, actual field play should drive the use and function of the EOC. This allows the county to identify if responders understand how to use an EOC and to determine whether or not the scenario justifies an EOC. It will also test how well EOC personnel understand their roles and how they support field operations. The exercise may require some simulated message input in order to fully test the process and interaction among agencies. For example, the scenario may require the EOC to coordinate the activation of two or more shelters. But if shelters are not actually being opened, the Controllers must act as the shelter operators and interact with the EOC as needed.

Here is one last note on exercise design. If Objective #1 is to be evaluated along with the EOC, then EOC members and equipment cannot be pre-staged or pre-setup. The goal is to evaluate how much time and effort is spent physically establishing an EOC.

D Evaluation Needs and Issues

The Evaluator for this Objective should be knowledgeable in how and why an EOC is used to support emergency operations. Typically, this is an EMA official from a neighboring county or a senior response official familiar with an EOC. The Evaluator should also be knowledgeable in the ICS in order to fully understand the relation between the EOC and the incident site(s).

The Evaluator should be looking to see that EOC members are actively pursuing information and anticipating response needs. If there is a lack of activity it typically indicates EOC members are either not receiving/obtaining information from the field, that the scenario does not warrant the use of the EOC, or that EOC members are familiar with the intent of an EOC. The Evaluator will also note how/if the facility is adequately equipped to support EOC operations.

This Objective can be evaluated along with Objectives #1, 5, 6, 8 and 9.

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Objective #5 Resource Management Demonstrate, or discuss in a tabletop exercise, the ability to identify, mobilize, and manage resources required for emergency operations.

A Basic Intent

Each incident involves a unique hazard, therefore, responders must carefully identify what resources are needed to contain and control a release. Responders will need to show they can arrange for and obtain the resources specifically required to manage the given scenario.

B Discussing the *Points of Review*

1. *Was the ICS/EOC staff knowledgeable of available resources and existing mutual aid agreements?*

Communities should have pre-identified what specific types of resources are likely to be needed during a chemical release and should have identified whether these resources are available locally or must be brought from outside sources. Those in charge should be familiar with what assistance is in-place locally and can be quickly mobilized.

2. *Were resource lists readily available and did ICSP/EOC staff obtain accurate information on resource availability?*

As personnel complete the initial scene assessment and develop an action plan, they will identify what assets will be needed at the onset of the emergency. On-scene responders may not remember where every asset is or how to obtain unique resources. The IC's staff, local EMA, or an activated EOC should consult the department, city, or county resource lists to identify and obtain needed assets (i.e. containment or absorbant supplies, speciality teams, specialized equipment). If these lists are not on-scene, they should be readily available to response personnel (i.e. via dispatchers, in the EOC, at an agency office). If they are uncertain of what assets are needed, personnel should consult with the spiller. Personnel may also contact state agencies (i.e. OEPA, PUCO), federal agencies (i.e. NRC), or private contacts (i.e. CHEMTREC) to obtain critical assets. Many EMA offices will maintain a listing of such resources.

3. *Were procedures actions taken to identify and obtain additional/replacement resources?*

This is *not* the function taken at the end of an emergency to replace used assets/cost recovery. This is the function that occurs during an emergency as key resources are quickly used and must be replaced. Such resources would include, but are not limited to, special tools like absorbents, gloves, diking materials, and may also include generic resources such as backboards, medical supplies, and SCBAs. This may even include the need to replace personnel. Command personnel should identify the need to replace an asset before the resource is exhausted and should demonstrate how to obtain the additional assets. This may even include the need to coordinate for the payment of the additional assets.

4. *Were appropriate resources identified and alerted to cleanup and dispose of materials and remediate the impacted area? Were cleanup/disposal actions coordinated with spiller?*

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If the spiller is known, the IC should prompt the spiller to initiate the recovery of the area and arrange for specialists to remediate the impacted areas. The IC should also consult with state officials such as OEPA, PUCO, ODNR, or ODH to identify if they have a need to implement unique cleanup measures and thus necessitate activation of specialized cleanup resources. The IC should not release the scene until certain that the cleanup resources on-scene can/will complete the remediation process. In the cases where a spiller is not known, the IC will need to coordinate for the cleanup and remediation with applicable State assets and identify what resources will be needed to recover the scene.

5. *Did the ICS P/EOC staff effectively track resources in use?*

Once a resource is on-scene, the various command personnel should have a system in-place that identifies where each asset is assigned to work. This system should be used to indicate at what point local assets will be exhausted and thus create the need to secure additional resources. The same system should also show when a given resource was released from service or the scene. The system may also identify when a resource is damaged or destroyed on the scene and must be replaced following the emergency. Overall, this system should track personnel as well as key/major pieces of equipment (i.e. equipment trailers, fire apparatus, etc.).

6. *Were records kept to document resources utilized for posterity and in support of the cost recovery effort?*

The cost of response will typically be the responsibility of the spiller, but it can also be the community's own responsibility. This documentation should track personnel and equipment costs, as well as contracted/rental costs for outside resources. Therefore, command personnel must ensure they have accurate records to show what resources were utilized. The documentation should show which assets were expended on-scene and must be replaced. Documentation after-the-fact may overlook certain costs, and it may be impossible to recover costs if records were not maintained.

7. *Were the actions taken based on existing plans and/or operating procedures?*

The LEPC plan is required to contain a composite statement of specialized equipment that is available within the County for chemical incidents. The plan should explain how assets are mobilized and how to secure resources that are not present in the county. Meanwhile, other agencies and departments may maintain their own resource lists and may have a SOP to activate those resources. Also, each County EOP typically has a chapter dedicated to Resource Management as well as Tabs that identify available resources. Those plans should be consulted for more information on resource management.

C Exercise Design and Control Issues

First, the exercise should challenge responders to acquire a variety of resources and not just those used for routine emergency calls. The scenario should also vary from year-to-year. This will prevent personnel from becoming complacent in only having to deal with one type of hazard.

Whenever possible, designing the scenario to incorporate the use of resources not normally requested by responders will help to challenge the participants. Performing the same resource requests repetitively offers little training and promotes complacency.

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Second, the Exercise Design Team should determine what resources would likely be needed to manage the exercise scenario. This will identify what assets must be available during the exercise and thus who should be invited to participate. Responders with limited supplies may not wish to participate if they have to use a costly or hard to replace asset (i.e. class A suits, patch kits). In this case, the Exercise Design Team should consider another scenario, solicit for donated resources, or ensure "training only" resources are available.

It is helpful to determine the resources likely to be requested during the design phase of the exercise. Understanding the resource requirements highlights those agencies and organizations who should be invited to participate. The exercise design team should take into consideration that resources in limited supplies or with a high replacement value may discourage participation; work with the providing agency or organization for alternatives before opting to change the scenario.

Also, the scenario may require responders to utilize assets from outside the community (i.e. Hazmat Teams, OEPA OSC, and Contractors). The Exercise Design Team should know if and how those assets are able to participate. For example, a Hazmat Team may wish to use the exercise as training but they may not be able to provide a full team on the day of the exercise. Or, the OEPA's hotline will support calls to their 1-800 number and provide technical assistance, but they may not be able to dispatch an OSC for the exercise. The exercise design team should also consider resources may not be under the total control of the host county. Specialty teams operating on a regional agreement may or may not be available to participate due to scheduling. In some cases when those resources are not available, the design team could employ a simcell to simulate the use of those assets but still require all the requesting, tracking and documentation from the exercise participants. If adequate local or outside assets are not available, the Exercise Design Team will need to choose another time to conduct the exercise or change the scenario to accommodate available assets.

This Objective is well suited for the Tabletop setting as it allows personnel to fully discuss what resources are needed and how to obtain them. The Players should be told in advance to bring their resource lists for this type of exercise. They will need to consult those guides and define how they contact the requested assets. The Controller will occasionally determine that a requested asset is not available and thus force Players to find alternate resources. The Players should also be initially reminded to document/track the resources they have activated as they would during a real response. The Controller will then closely track which resources are where and then occasionally direct personnel to announce what assets are on-scene to see if/how resources were truly being tracked.

For Functional and Full-Scale exercises, this Objective is greatly influenced by what assets are and are not available the day of the exercise. If specific resources will not be participating, Players must still demonstrate how to contact those needed resources or alternate resources. The Controllers will need to brief Players, especially dispatchers, as to what assets will or will not be available for the exercise. The Players should attempt to contact all needed resources unless told otherwise by the Controllers. The Controllers will acknowledge when the resource was requested through the proper channels and then allow Players to respond as if they had the resource (i.e. additional booms, absorbents). This simulation should be kept to a minimum, otherwise there is a loss of training and the Objective will be not be completely evaluated. In cases where only information is requested (i.e. a call to Chemtrec or OEPA for information), Controllers must be ready to provide the technical assistance when the external agency has

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indicated that they will not participate in the exercise.

D Evaluation Needs and Issues

Someone who understands the local resources and their availability should evaluate this Objective. Evaluating this objective requires a knowledge of local resources and local plans and procedures. The most qualified candidate for an evaluator would be someone intimately familiar with the Resource Management process in the exercising county. This can include EMA personnel, Hazmat Team members, or senior First Response personnel. The Evaluator must be able to recognize and anticipate what resource requests will be needed for the given scenario.

The Exercise Design Team should brief the Evaluator on those assets that will not be available but will be simulated by the Controllers. This will ensure the Evaluator can note that the action was accomplished. The Evaluator should then observe this Objective by watching the various command positions and how they determine their resource needs. This review should note how personnel work together and coordinate resource needs through the CP, dispatch, and/or the EOC. The Evaluator should also review and observe how personnel use their pre-planned "resource lists" to identify and activate assets. The key is to see that resource requests are not being duplicated and that assets are being properly integrated into the response system.

The Objective can be evaluated along with most any Objective, but it is well suited to be tested along with Objectives #3 and 4.

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Objective #6 Communications	Demonstrate, or discuss in a tabletop exercise, the ability to effectively establish and maintain communications among all appropriate response locations, organizations, and personnel.

A Basic Intent

The ability to communicate during an emergency is commonly noted as the single most challenging aspect of the response. The challenge is not necessarily with the equipment; instead the challenge is in how the people use that equipment. Thus, the ability to effectively communicate with each other depends on how the people use the available equipment. Pre-planning, training, and actual incidents should have identified what radio frequencies, phone lines, and non-verbal signals will be used to manage operations. This applies to on-site personnel as well as off-site personnel.

B Discussing the *Points of Review*

1. *Were response and support organizations able to effectively communicate with each other?*

This should determine if each group was properly included into the response system via communications. It should identify if the on-scene communications allowed each group (fire, EMS, law, mutual aid) to communicate with each other or not. This should include outside groups such as state agencies, private contractors, and/or the spiller. It should note that off-site agencies (medical facilities, traffic controllers, shelters) were alerted and that a line of communications was promptly established or not. This should determine if the IC and the EOC could communicate with each other in an effective manner.

2. *Were communications effectively utilized to gather and disseminate information about the incident?*

This should identify if personnel properly used the equipment they had to share information. Initially, this looks at how dispatch centers facilitate the communications process and provide first response information. On-scene, the IC is the focal point and thus must establish a communications protocol. This means that individuals know who to contact and that side or long conversations are avoided. Personnel understand who is responsible to coordinate with off-site groups so those two groups are not making the same call. Also, off-site groups should know whom to call on-site for questions, and should not be questioning every action. This should identify if messages are relayed verbatim or were they modified or interpreted by the receiver. Finally, updates of the incident should be made in a timely manner and should go to all involved groups.

3. *Were the existing communication links able to handle all necessary traffic?*

This should identify if the existing equipment supported or hindered operations. The CP must determine what frequencies should be used, whether it is a tactical frequency, a common channel, or a combination of channels. An EOC should have an adequate number of phone lines and ensure response groups bring their own radio support. Personnel should identify what technique (phone, radio, or relay through dispatch) will be used to contact and inform off-site agencies. This should note how personnel overcame communications problems. Personnel

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should be able to identify where an equipment incompatibility exists (i.e. high band vs. low-band). They should have a plan to provide or share compatible equipment. They may have to mobilize alternate or back-up communications (i.e. amateur radio, mutual aid with a cellular phone provider). Sometimes face-to-face communications or hand signals can overcome an equipment/personnel incompatibility. Other problems include poor radio/phone coverage due to location, failing phone batteries, or overloaded dispatch centers. Whoever discovers the problem (i.e. dispatch, off-site, CP, EOC) should work to create a solution to the problem.

4. *Did personnel identify shortfalls in the communications being used and take appropriate steps to alleviate the communications problems?*

This should note how personnel overcame communications problems. Personnel should be able to identify where an equipment incompatibility exists (i.e. high band vs. low-band). They should have a plan to provide or share compatible equipment. They may have to mobilize alternate or back-up communications (i.e. amateur radio, mutual aid with a cellular phone provider). Sometimes face-to-face communications or hand signals can overcome an equipment/personnel incompatibility. Other problems include poor radio/phone coverage due to location, failing phone batteries, or overloaded dispatch centers. Whoever discovers the problem (i.e. dispatch, off-site, CP, EOC) should work to create a solution to the problem.

5. *Were records kept to document the key communication activities?*

To assist in managing communications, the command staff should be monitoring transmissions and documenting these conversations. Not every radio or phone conversation needs to be recorded; staff should only note key events. This documentation will show when certain calls were made (i.e. to the spiller, OEPA, media). It should be noted that some groups rely on local dispatch centers to track messages. But, these sites may not be able to record every message and they cannot be easily replayed or reviewed by on-scene personnel.

6. *Were the actions taken based on existing plans and/or operating procedures?*

The LEPC's plan must contain procedures and/or guidelines for a reliable and effective communications system between emergency response groups and to the public. Also, many response agencies have their own communications protocols. These procedures and the lessons learned from past incidents should ensure groups effectively communicate among one another.

C Exercise Design and Control Issues

This Objective is best tested under field conditions. It can be tested in a Tabletop setting, but it will require a comprehensive discussion of procedures and/or guidelines. The Controller will need to ensure personnel adequately explain how they employ communications, discuss their limitations and resolve common problems. The Tabletop exercise may help responders identify common misuses of equipment and redefine procedures and/or guidelines to overcome those problems.

When evaluating this Objective in a Functional or Full-Scale setting, the Exercise Design Team will need to discuss a few concerns in its pre-exercise meetings. It is possible to congest radio frequencies with exercise activities and thus interfere with normal operations. The Exercise Design Team may consider running the exercise on one frequency and leave the rest available for real emergencies. This will consolidate radio traffic but it will may not completely evaluate the communications system. Some will say that no emergency ever happens alone and thus use

all of the local communications. This can lead to confusion when a real incident occurs at the same time as the exercise. The Exercise Design Team must determine which communication systems will be utilized and what limitations apply if any. They will then need to brief Players on these limits. Also, Players should be briefed to initiate each radio/phone call with "**This is an Exercise**" in order to avoid any confusion between exercise and real calls.

Finally if this Objective is to be evaluated solely at an EOC, the Exercise Design Team will need to ensure all of the site's communications capabilities are for use. This includes the activation and use of dormant phone lines, which may need to be specifically activated. Also if there is no field play and this is an EOC Functional exercise, the Exercise Design Team will also need to setup communications to simulate the emergency. For example, Controllers with radios will act as the IC, Hazmat Team, Law Enforcement, or other groups who are working in the field. Meanwhile, other Controllers with phones act as the Medical facility, Shelter, Media, or other applicable agencies. These Controllers then act as Players to simulate the emergency.

D Evaluation Needs and Issues

The Evaluator for this Objective should be familiar with the local response system and know how communications are typically managed for emergencies. Typically, this person should have a fire, law enforcement, dispatch, or EMS background.

If using a single Evaluator, the Exercise Design Team needs to provide them access to radio equipment that can monitor the local frequencies during the exercise. The Evaluator should also move about the various command positions to observe how they manage communications on-site and off-site. The Evaluator may also need to query Players as to whom they are routinely talking with if they are using communications other than radios.

Also, the Exercise Design Team may use more than one Evaluator to observe this Objective. Evaluators can be assigned on-scene as well as in the various off-site locations (dispatch centers, EOC). Multiple Evaluators can watch their location more closely and this should generate a more complete review of the communications process.

This Objective can be evaluated along with Objectives #1 and 9. Or, the team may elect to have this Objective evaluated as a second Objective by each Evaluator.

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Objective #7	**Response Personnel Safety** Demonstrate, or discuss in a tabletop exercise, the ability to protect emergency personnel health and safety.

A Basic Intent

The intent is to ensure response personnel are not placed in a hazardous situation without proper equipment, training, and procedures to safely work on-scene. To implement this, the command structure will need to ensure access to the immediate hazard is controlled. They need to identify the hazards and provide the proper protective clothing for personnel to control the released materials. Finally, they need to ensure a decontamination process is in-place to protect those who were exposed to the hazards. The importance of this Objective is reflected in OSHA's emergency response standard (29 CFR 1910.120), as adopted by Public Employee Risk Reduction Program (PERRP), Ohio Hazmat TAC and the NFPA's recommended practices for hazardous materials events (NFPA 471, 472, 473, and 1600).

B Discussing the *Points of Review*

1. *Were proper procedures and/or guidelines followed so the arrival at the scene did not expose or contaminate personnel to the on-scene hazards?*

As the first piece of equipment arrives on-scene, responders should recognize that chemicals are involved. If the initial notification includes information about the hazards, dispatchers should provide this information as they mobilize responders. Vehicles should cautiously approach a known Hazmat scene and stop at a safe distance. No response actions should be taken until the hazards are assessed.

2. *Was a Safety Officer clearly identified and effectively in control of site safety?*

OSHA requires a Safety Officer be designated for each Hazmat incident. OSHA notes that the Safety Officer is responsible to recognize when personnel are in imminent danger and must take action to alter, suspend, or terminate those activities. The IC may elect to act as the Safety Officer for small incidents, but should delegate this function for large or complex scenarios. The IC needs to ensure personnel on-scene know who the Safety Officer is. This person will need to work closely with the Operations Officer and those who will work within the hazard area.

3. *Were hazard zones clearly defined and effectively controlled to ensure no one entered a restricted zone without the proper personal protective equipment (PPE)?*

OSHA notes that the ICS, shall limit the number of responders working at the site, particularly in those areas of potential or actual exposure to the hazards, should be limited. To facilitate this process, the use of control zones is recommended to limit access. This typically involves three zones and they go by a number of names. They are the Hot or Contamination Exclusion, the Warm or Contamination Reduction, and the Cold or Clean Support zones. To be effective, responders must establish and define these zones at the beginning of the response. Responders may use flags, cones, or barrier tape to define each zone. A formal process must be in-place to ensure personnel do not move between the zones without the appropriate personal protective equipment (PPE). The Safety, Decon, Operations, or Hazmat Team officers control access. Personnel should be directed to proceed through clearly defined checkpoints. This will ensure personnel do not enter the zones inadvertently and they are decontaminated as they re-enter the cold zone.

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4. *Was an appropriate level of PPE chosen and issued to personnel who were properly trained to use the equipment?*

OSHA requires that personnel have the appropriate PPE, which includes SCBA if an inhalation hazard is present. The personnel responsible for ICS Ssafety and Ooperations positions officers need to consult with the spiller, the shipping papers, MSDS, or a technical expert guidance or local plans/procedures to determine what PPE is appropriate. PPE is divided into four categories (A, B, C, D), and the appropriate level depends on the hazard and the work location. The NFPA 471 standard addresses what type of PPE should be used. The IC should know his responders' level of training and ability to work in the hazard zones. If not, personnel should be queried so that someone is not assigned a function if they are not properly trained. The NFPA 472 standard notes that personnel with Operations Level training are qualified to don PPE, work in a defensive function, and doff PPE. Technician Level training permits the use of specialized PPE and to perform more technical offensive actions. The IC should know his responders' level of training and ability to work in the hazard zones. If not, personnel should be queried so that someone is not assigned a function if they are not properly trained.

5. *Were personnel, to include arriving mutual aid resources, adequately briefed on the hazards, PPE requirements, and expected response actions?*

Personnel must be briefed on the physical and health hazards before beginning a response action. They should understand their expected work function (rescue, containment, decontamination, etc.). The briefing should stress to make minimal contact with the materials and to use the "buddy-system" while in the hazard zones. This briefing may occur when the resource arrives at the staging location, or by the Safety Officer in conjunction with the Operations Officer Chief or Hazmat Team. In either case, command personnel must ensure personnel are fully briefed on their tasks and with whom they coordinate their activities. Arriving personnel should inform the IC as to what tasks they are *not* equipped or trained to accomplish.

6. *Were proper methods followed to safely control and stabilize the released materials (i.e. use a team approach, use spark-free tools, minimize contact, etc.)?*

Once the product is identified, appropriate techniques should be employed safely to secure the scene. Response techniques such as laying booms, building dikes, or applying neutralizing agents should be accomplished with a little or no contact with the spilled liquids and solids. Also, equipment and tools should be "spark-free" if the released materials present a flammable hazard. When over-packing or up-righting a drum, the "buddy-system" should be used to minimize injury and exposures. Confined space may be a problem if entering boxcars or tractor-trailers, and steps must be in-place to recover personnel if they become entrapped. Also since personnel will be covered in PPE, they will need to monitor how long they are in protective suits or using SCBA. They must watch each other for signs of exhaustion, heat stress, or low air supplies, and then evacuate the scene before rescue is needed.

7. *Was adequate medical monitoring provided for hot and warm zone personnel to include providing rehabilitation and debriefing on the hazards?*

Typically, an EMS unit will be assigned to support entry and operations personnel. EMS personnel will initially complete baseline checks on entry members and then check them as they leave each zone. EMS needs to provide entry and decon members a suitable rest and rehab

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system. NFPA's 471 notes that this should include medical evaluation and treatment, food and fluid replacement, and relief from climatic conditions. Fatigue or heat exhaustion will likely be the greatest hazard. They should also check responders for signs of exposure and any reaction to the materials after they leave the hazard zones. Before concluding operations, EMS personnel should brief Responders regarding long-term signs of exposure. For additional information, review NFPA's 473 standard as it outlines what training EMS personnel should have for working at a Hazmat scene.

8. Were back-up teams identified and readily available to support entry personnel?

The IC must ensure personnel are available and properly suited as "back-ups" for those working in the hazard zones. These personnel should not be accomplishing other duties, and should be in a position to immediately dress and enter the hazard area. They may be needed to rescue a responder in a hazard zone or be used to replace workers. Also, the IC, Ops or Safety Officer should have a schedule developed to replace decontamination personnel.

9. Were procedures followed to safely account for and track all response personnel on-scene?

This system should have the ability to identify what personnel are engaged in which response functions. It should note what members are in the hazard zones and how long they have been in those areas. The system should also have the ability to immediately notify and evacuate personnel from where an imminent hazard exists, and then account for those persons once they are clear of the scene.

10. Was an effective means of communications available utilized between the IC, Safety Officer, decontamination personnel, and entry personnel to safely conduct operations?

There should be a clearly established means of communications between those in the hazard zones and back to the cold zone. This can be accomplished through specialized communication sets or the use of department radios on a dedicated/tactical channel. As a backup, personnel should have an understood set of visual and verbal signals. An emergency evacuation signal should also be briefed or understood.

11. Was an effective established process used to decontaminate personnel and their equipment?

A decontamination system must be in-place before responders enter the hazard area. The IC must identify the most effective means to remove and contain the contaminant. The process can be the physical removal of the chemical (washing, vacuuming, or absorption). It can also be the chemical reduction of the hazard (degrade, neutralize, disinfect, solidify). Also, an emergency or gross decontamination can be used to support an immediate rescue or removal from a hazard zone. Personnel should also have a defined method to see that remove contaminants have been removed. Personnel should also understand how or if a secondary contamination hazard exists. NFPA's 471 standard discusses this topic in detail.

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12. Were contaminated wastes controlled and properly held for later disposal?

Personnel must identify what items could not be decontaminated. In this case, equipment must be disposed of and subsequently replaced. Ensure personnel give mechanical or electrical equipment a thorough inspection to determine its ability to return to service. Those materials that cannot be decontaminated must be collected and contained for proper disposal. Over-pack drums may be used to contain the materials. If in doubt, responders should consult the spiller, a cleanup contractor, or OEPA on how to properly handle these materials.

13. Were records kept to document the key response operations?

Command staff should have a running record that outlines the key response operations that were implemented to include any safety related items. Operations personnel should note what PPE was issued, what decontamination was done, and what safety issues arose. Documentation is used to ensure actions have been implemented or to identify what additional actions may still be needed. After the event, the documentation will be used to improve procedures or to resolve a liability issue.

14. Were the actions taken based on existing plans and/or operating procedures?

NFPA's 471 standard notes that an emergency plan should outline these safety procedures in accordance with OSHA's requirements. OSHA allows departments to use the LEPC's plan if it addresses these issues. The LEPC plan must contain this information or it will rely on the individual departments' procedures and/or guidelines.

C Exercise Design and Control Issues

The Exercise Design Team needs to ensure that the hazard scenario and scene present a realistic incident. There should be sufficient clues and /or visual aids present to allow responders to identify the hazards. It should allow personnel to fully implement their response and safety procedures, and demonstrate their ability to protect responders from the hazards posed by the scenario.

For Tabletop exercises, the Exercise Design Team and Controller should have a fully-scripted scenario. The Controller will outline the spill in increments so responders can address their response functions. The Controller can also use an overhead projector or computer presentation to illustrate the scene and spill. Players should also be briefed to bring any research guides and reference materials that they would normally have on-scene.

For Functional and Full-Scale exercises, the scene should be setup to closely resemble a real spill. This includes leaking drums, dispersed powders, burnt containers, etc. Aids may also include items such as a smoke generator to simulate a toxic gas cloud or use of a colored-water to simulate a corrosive liquid. Exercise Controllers should also be available to provide verbal descriptions of the scene to responders so they clearly understand what the scenario is and react properly to the scenario.

Next, the Exercise Design Team needs to discuss what actions will be taken should a Player disregard a safety issue or their action results in an unsafe situation. First if the action would cause an ***actual*** injury (two people carrying a backboard when four are required), the Controllers must obviously stop and correct the event. Evaluators should also be briefed to watch for and prevent unsafe actions. The issue should be quickly corrected, debriefed, and the exercise should

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be continued. Second if the action poses a ***simulated*** hazard (a Player approaches a simulated airborne hazard without SCBA or puts finger into simulated corrosive liquid), the Controllers may wish to make that Player a new victim. The Player would be debriefed on why the action was unsafe and then would be made be a victim needing rescue/treatment. Or, the Controllers can simply make a mental note of the event and then debrief the action after the exercise.

Finally, Controllers may choose to suspend some portion of the exercise play in the interest of time or safety. For example, limited class B training suits may be available for the exercise. In this case, Controllers may allow a few Players to initially suit up and demonstrate they know how to properly don and work in the PPE. Controllers can then allow Players to remove the gear and continue the exercise with simulated PPE.

Overall, allowing too much simulation often hampers this Objective. Simulation does not demonstrate that personnel can safely implement these procedures. Nor does it allow personnel to receive valuable hands-on training. The Exercise Design Team should ensure there is ample time, equipment, and personnel to fully demonstrate this Objective.

D Evaluation Needs and Issues

The Evaluator for this Objective needs to have a working knowledge in response safety. The person may be a Hazmat Team member, a Facility safety supervisor, or a trained First Responder. The person should be trained at least to the Operations level and preferably to the Technician level. They should also understand OSHA's and NFPA's requirements in regards to site safety.

In conducting the evaluation, the Evaluator should shadow the Safety and Operations officers. The Evaluator should also observe how a Hazmat Team interacts with the local response system. Also, the Evaluator should follow entry and decontamination personnel as they move in and out of the hazard zones. The goal is to see that personnel are thinking about the hazards before committing themselves to a response action. The best action may just be to do nothing. The Evaluator may need to query various Players to see if they have received information about the health hazards, what are the contamination hazards, what PPE is required, and what actions should be taken to prevent unwanted exposures to the materials.

This Objective can be evaluated along with Objectives #2 or 14.

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Objective #8 Population Protective Actions Demonstrate, or discuss in a tabletop exercise, the ability to identify and implement appropriate protective actions based upon projected risks posed to the public.

A Basic Intent

To develop protective actions, responders must promptly assess the severity of the hazard and the impact it poses the general public. The Objective focuses on the decision-making process, the implementation of the actions, and the support needed by special populations.

B Discussing the *Points of Review*

1. *Did personnel determine how and which geographical areas could be at risk?*

Responders need to clearly identify how the released materials will impact the surrounding area. They should identify the risks posed to both the public and the environment. They should consider how the release impacts a congested urban or residential area as well as the impact to a park or farmer's field. Personnel should know determine if it may poison crops, kill wildlife, or contaminate well water. They should determine how the topography (rolling hills, open fields) affects the movement or impact of the released materials. They should identify if the material will collect in low-lying areas (heavy gases such as propane). Also, responders should determine how long this impact would last. It may last for days, it may disperse quickly, or it may exist until it has been physically removed.

2. *Was an appropriate protective action decision made in a timely manner, based on the risks posed and the area to be impacted?*

Based on hazards and the surrounding area, responders must then decide what actions will best protect the public and environment. Responders can evacuate the area, or have people shelter in-place, or use a combination of these actions. Responders should also consider the impact that the time of day and season has on the protective action. There may not be enough time to evacuate. To shelter in-place during the cold of winter or heat of summer may create a greater hazard. They should also determine if this is going to be a short-term incident or if it requires a long-term isolation and subsequent restoration of the area.

3. *Were protective actions implemented in a timely manner and effectively coordinated among organizations?*

Once the protective action is chosen, its effectiveness will be influenced by how fast responders can safely implement and coordinate the action. If evacuating, responders may be exposed to a hazard and thus may need to don PPE and this will delay the response. Also, there may not be enough trained personnel to accomplish the task and additional agencies will need to be mobilized to help implement the action. Local law enforcement personnel may be enough to go door-to-door, but may need support from ODOT other agencies to establish roadblocks. Also, the ARC shelter lead will require advance notification so they have time to mobilize personnel if a shelter is needed. In the meantime, local responders will need to care for the evacuated public or advise them where to go for assistance. The IC may even delegate the oversight of these actions to an activated EOC and thus allow the IC to stay focused on containing the release.

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4. *Were media alert/notifications implemented in a timely manner? and the content of instructions appropriate to the protective action made?*

Part of any protective action is the need to promptly alert the public via the media. Responders may initially rely on door-to-door notifications but the process will also likely include using local media assets to broadcast warnings.

5. *Was the content of instructions appropriate to the protective action made?*

Media techniques include the use of cable television alerts, live radio/TV broadcasts, or the activation of the EAS, social media outlets and mass notification systems (ie: IPAWS). Regardless of the tool used, responders will need to insure the message provided is clear, concise, and understandable to the common person. Some typical points that should be made include, but are not limited to, what routes are and are not to be used. Or, it may include instructions on caring for pets, assisting elderly or handicapped, disabled, or having proper medications on-hand. Responders also need to remember that the general public may not understand why or how to implement the action. Therefore, the information must clearly instruct the public on how to implement the protective action.

5.6. *Did response personnel take appropriate steps to identify address access and functional needs groups and take care of and special needs populations?*

Responders must identify what procedures and resources they will need to have in order to alert and protect special needs groups populations. A special needs group population is one that needs special assistance to receive and implement the protective action. It may include people with disadvantages such as elderly or disabled handicapped. This may include populated areas such as schools, shopping centers, prisons, or medical facilities. It may include people with disadvantages such as elderly, or handicapped. This may include populated areas such as schools, shopping centers, prisons, or medical facilities. It may also include vacation areas such as campgrounds, or special events such as county fairs and high school football games. Finally, this may include those with cultural differences such as migrant workers who speak a foreign language or groups difficult to contact like the Amish/Mennonites.

6. 7. *Were proper methods followed to assess/monitor hazards to the general public and environment, and were the protective actions updated as required by changes?*

As the incident progresses, responders must continuously assess how the public and environment are impacted by changes in the incident status. Responders should relax or expand the protective actions as required. Changes in wind direction will move an airborne toxic. Rains may spread a contaminant or create a new danger if the material is water-reactive. As the materials are absorbed or the leak is plugged, the actual threat is diminished. Responders need a method to determine these changes and then implement a process to alert the public and support agencies implementing the protective actions.

7. 8. *Was the process to return evacuees to their homes effectively coordinated, between traffic controllers, shelter managers, and the command system?*

Responders ultimately need to show how they determine the surrounding area is safe and can be returned to its normal use. This may be through the use of air monitors to show an airborne toxic or flammable gas has dispersed, or that the liquid has been diked and/or absorbed. Responders then need to show what procedures, personnel, and resources are used to return

people home in an organized manner. This includes developing public information messages, going back door-to-door, closing shelters, briefing the media, etc.

8.9. Were records kept of protective action decisions made, instructions issued, and actions implemented?

Command staff should have noted what protective action was implemented and how it was concluded. They should note any unique concerns or actions that occurred in regards to the protective action. For example, noting that some people along a given street did not want to evacuate. Documentation is used to ensure actions have been implemented or to identify what additional actions may still be needed. After the event, the documentation will be used to improve procedures and/or guidelines, or to resolve a liability issue.

9. 10. Were the actions taken based on existing plans and/or operating procedures?

The LEPC plan must contain evacuation procedures to include measures taken to establish alternate traffic routes. The plan must also include procedures to communicate with the public in a timely and effective manner. Plus, the hazard analysis section should identify what geographic areas will likely be impacted by a release (i.e. at/around EHS Facilities, along transportation corridors, etc.).

C Exercise Design and Control Issues

The most common problem encountered when testing this Objective is that the scenario often does not have a significant impact to the general public or environment. For example, a transportation incident may only stop traffic flow, or a facility spill only impacts the on-site employees. The Exercise Design Team needs to create a scenario that impacts the off-site population and the environment. Scenarios need to allow responders to alert and protect more than just a couple homes or dike the ditch along the roadside. It should also include an impact to some special population or event such as the county fair, a high school sporting event, a migrant farm, or a nursing home.

For Tabletop exercises, defining the scenario and generating a full discussion of the local impact can be particularly challenging. The scenario should input various public concerns and impacts so that responders discuss a full-range of problems. Worst-case scenarios are well-suited for such discussions. The Controller will need to ensure personnel fully discuss the coordination needed among agencies and the time constraints imposed when implementing the public protective actions.

For Functional and Full-Scale exercises, the common problem associated with this Objective is that the Players do not "physically" complete the tasks. The Points are often only simulated. This simulation does not demonstrate how the procedures are implemented or if they are effective. Field exercises must physically demonstrate the actions. Therefore, the Exercise Design Team needs to ensure the scenario and the exercise setup allow personnel to physically complete each task. To help test this Objective, the Team should also make arrangements to have the general public participate in the exercise. The public can be informed that an exercise will test a given protective action and their support is needed. They can be asked to actually evacuate and report to an opened shelter. If the public is not going to participate, they should be advised that responders will be conducting an exercise in their area and please excuse any inconvenience.

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As a safety issue, responders must be briefed as to how much of the procedure they will actually be required to carryout. For example, they should write-out each press release and not just say they have notified the public. Or, they should go door-to-door and not just say the area is evacuated. The same is true for establishing roadblocks, moving people, or opening shelters. In any case, the Exercise Design Team will need to establish how far each Point must be demonstrated. Exercise Controllers will then acknowledge when the Point has been adequately demonstrated.

D Evaluation Needs and Issues

The Evaluator for this Objective should be knowledgeable in response procedures as it applies to implementing protective actions. Typically, this will be someone with a fire or law enforcement background.

This Objective may need to have more than one Evaluator should the Functional or Full-Scale exercise include activities away from the immediate incident site. For example, Evaluators can shadow responders as they go door-to-door, setup roadblocks, and interact with the general public. Meanwhile, one Evaluator would stay at the command structure to observe the decision-making process and how actions are coordinated among the response agencies. Evaluators may have to query Players to see if they know how or why the particular protective action was chosen or to understand how they overcame problems while implementing the action.

This Objective can be evaluated along with Objectives #2, 3, 4, 8, and 10.

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Objective #9	**Emergency Public Information**	Demonstrate, discuss in a tabletop, the ability to coordinate and disseminate accurate information about the incident to the public and the media in a timely manner.

A Basic Intent

Chemical incidents have the potential to cause significant harm to the surrounding area. As such, these incidents draw a great deal of media attention. Therefore, response personnel must be prepared to respond to media inquiries and convey that the public is being protected. This Objective looks at the abilities of responders to gather and disseminate accurate information to the public. Responders will need to identify and activate warning systems that can inform the public in a timely manner. And, they must demonstrate their ability to coordinate information with the various media outlets.

B Discussing the *Points of Review*

1. *Was an individual clearly identified as the lead Public Information Officer (PIO) for this incident and thus was authorized to draft and release of information to the public and media based on subject matter expertise provided?*

One spokesperson should A coordinated release of information should be made to the public otherwise conflicting and misleading information could be created. The IC may act as the PIO in small incidents and accomplish the task from on-scene. In larger incidents, the IC should delegate this function. In the larger events, a Joint Information Center (JIC) may be established with a lead PIO selected. the PIO may be a First Responder, a chief elected official or other recognized government agent. The Hazmat Plan, EOP, or even local SOPs should identify who will fulfill the PIO role. The average responder should not answer media questions. Instead, they need to refer all media and public questions to the PIO or IC. The PIO is authorized to draft and release information, but should coordinate these actions with the IC. They may even need to gain approval with senior elected officials when releasing sensitive information. Keep in mind, a PIO may not be the event spokesperson, and therefore not be expected to speak publically.

2. 5. *Once created, Wwere media notifications made in a timely manner?*

The IC should have one person or group clearly designated to interact with the media and release information to the public. Often initial notifications are made through a local agency's online platform or social media. On-scene, law enforcement personnel should establish a location near to the scene that permits interviews and film coverage The IC and PIO should work with responders to establish a media staging area. This is to answer questions and ensure the media do not hamper response efforts or endanger personnel. The PIO should make contacts with designated media outlets. The EOC may work to see that media outlets outside of the area can obtain information about the incident. Meanwhile, on-site interviews may also be used to alert and brief the media. Local law enforcement IC or the PIO should designate an area for media groups to ask questions and receive information about the release. The location should provide photo opportunities and permit routine access to key response personnel. In larger incidents, the County may establish a Joint Information Center where information can be provided continuously and would not hamper response efforts.

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3. *Were pre-planned alert and notification methods effective?*

Responders need to identify what method can best be used to alert the public. Techniques include the use of sirens, public address systems on vehicles, phone calls to special groups/locations, or door-to-door notifications. Responders may rely on the social/electronic media, television, cable, or radio broadcasts (i.e. EAS), or other technology to inform the public. Some communities use pre-scripted messages to speed the release of media alerts. Live broadcasts are used as well, but this process is used more to provide updated information instead of the initial alert. All of these options should be pre-planned and thus allow responders to quickly alert the public.

4. *Was the public notification process effectively coordinated among involved organizations?*

The public information process must be conducted in a controlled manner. This requires each response agency to relay media inquiries to the IC or PIO. Responders should not speculate on the progress of response actions or the scene's hazards. The PIO will needs to consult with the IC or EOC as appropriate before it releases press information. The PIO may also need to consult with the local Chief Elected Official to ensure the information reflects their concerns as well. Also, response and support groups off-site should provide the CP/PIO information on actions they are taking that affect the public. Those groups should also provide feedback to the CP/PIO on what concerns they hear from the public. The goal is to ensure the process is coordinated and the public receives accurate information on the protective actions.

5. 2. *Was the content of press releases public and media notifications appropriate to the emergency, response actions taken, and protective actions implemented?*

The public and media generally do not understand what problems arise during a chemical incident or how the problems are managed. The messages should avoid the use of technical jargon or response lingo. It should reassure the public that the situation while hazardous is being managed by response forces. The information should not speculate on future events or make accusations about the cause of an incident.

6. *Did the PIO remain aware of the emergency situation's status and develop appropriate follow-up messages based on incident changes?*

As the situation changes, the IC and command staff and/or Executive Group in coordination with the PIO should evaluate the need to update the information provided to the media and general public. The process requires the PIO to be actively involved within the command structure and/or Executive Group to exchange and confirm information about the release. Procedures should be in-place to assess the released information and work with media to correct misinformation. The PIO should occasionally establish a method to watch/listen to the media releases to catch and correct misinformation. The PIO may need to have an off-site group (who has access to TVs and radios) monitor the local media stations. This may be assigned to an EOC, a dispatch office, a response agency's main office or the JIC (if activated). These updates should reassure the public that the situation is being managed, dispel rumors, and provide additional information. This may include information about shelter status, health concerns, or protective actions. The process requires the PIO to be actively involved within the command structure to exchange and confirm information about the release. The PIO or IC spokesperson should also meet routinely with media personnel on-scene and update them on the current status of the scene.

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7. Were procedures and/or guidelines in-place to monitor and respond to rumors raised during the emergency?

Traditional media and social media monitoring, as well as rumor control, are important aspects of emergency public information. It is media's business to cover the story, but the information they release may not be wholly entirely accurate or may speculate on actions taken. Messages may be misinterpreted or altered and thus change the intent of the information. Generally, it should be demonstrated how media platforms will be monitored and what the response would be if messaging is inaccurate or rumors present. The PIO should address mis-information appropriately. of If the IC, PIO, JIC, or EOC are not monitoring media, the public may react in a manner that disrupts protective actions. For example, a larger portion may evacuate than necessary or designated road detours may be bypassed. Procedures should be in-place to assess the released information and work with media to correct misinformation. The PIO should occasionally watch/listen to the media releases to catch and correct misinformation. The PIO may need to have an off-site group (who has access to TVs and radios) monitor the local media stations. This may be assigned to an EOC, a dispatch office, a response agency's main office or the JIC (if activated).

8. Were records kept to document messages issued, briefings made, and actions taken?

Throughout the incident, the command system should document the actions taken to initially alert the public, generate follow-up information, and to work with those media assets on-site and off-site. The designated PIO should record when and how information was released to the public. For larger incidents, procedures could be in-place for an off-site location to videotape or record news alerts. This process will assist in rumor control, supports the critique, and identifies future preparedness needs. This process will assist in rumor control, supports the critique, and preserves documentation for posterity.

9. Were the actions taken based on existing plans and/or operating procedures?

As noted before, the emergency public information process should be pre-planned. The LEPC plan must contain procedures for the timely and effective use of communications to the general public. The all-hazard EOP typically has an Annex dedicated to this topic. Plus, most ICS training teaches responders how to appoint and use a PIO as part of the command structure. Therefore, this process should be defined in local SOPs.

C Exercise Design and Control Issues

This Objective can be evaluated as part of the Command Post function or in an EOC-only exercise, or both at the Command Post (CP), Joint Information Center (JIC) and Emergency Operations Center (EOC). The Exercise Design Team will need to anticipate how this function will be managed for the chosen scenario. This will determine what inputs or simulations should be provided to fully test the Objective. When designing an exercise with this as an objective, consideration should be given to the role media and social media would play in a real-would incident, such as rumor control and social media monitoring.

The exercise should also include the participation of local media assets. The Exercise Design Team should ask for television, radio, and print media groups to participate in the exercise. They can be used in one of two ways. Media can be asked to respond as if this was a real incident. This free-play technique will permit Players and media groups to interact naturally and should

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generate a more complete evaluation. To make this work, media assets must commit to playing as would any response agency otherwise the Objective will not be fully demonstrated. Media can also be used as part of the Exercise Design Team and script out messages. The Exercise Design Team will establish what questions should be asked or what challenges media groups should pose to responders. Here, media is an exercise simulator rather than a Player.

If media will not participate at all, the Exercise Design Team could use volunteers for Functional and Full-Scale exercises to act as media personnel. Again, the Team will establish what questions should be asked or what challenges the volunteers should pose to responders. The Exercise Design Team must use personnel that understand the media process otherwise the exercise of this Objective will be ineffective.

For Tabletop exercises, responders will be challenged to thoroughly discuss each Point of Review. The exercise Controller will need to have inputs ready to prompt or direct the course of discussion. The Exercise Design Team will likely need to script out various problems that will be raised by the public and the media for the given scenario. The Controller needs to ensure Players thoroughly discuss the activation of automated alert systems such as sirens and telephonic notification software. The Players should also be asked to draft and verbally give press briefings to the Controller (who is acting as the media). Players should not be allowed to just say that they would give a briefing, make them demonstrate it.

For Functional and Full-Scale exercises, Players will need to physically complete each Point of Review to its fullest extent in field exercises. They need to actually write press releases and develop follow-up messages as the incident progresses. They should actually contact media outlets for briefings and give on-scene media interviews. If responders decide they should go door-to-door with sample messages, they should physically dispatch personnel and complete that process. It is too easy to "simulate" these actions or just to say it's done.

There is a caution to this, the media and general public may misunderstand "exercise messages". The Exercise Design Team should pre-define which media outlets will "play along" and thus take the press release but not actually release information. If Players are going door-to-door, a pre-defined "impact community" should be pre-briefed to expect responders and what they will be doing. If needed, the community can be asked to either implement the protective action or just simply acknowledge the message. As a caution, remember that media and the public may not always hear that this is an exercise. Players must be instructed to state "This is an Exercise" when giving *any* information to the media or general public. Pre-exercise design is critical for Functional and Full-Scale exercises and clearly defined "rules of engagement" must be briefed to the Players *in advance*.

D Evaluation Needs and Issues

This Objective will focus on how the public is informed and thus rests with the person(s) implementing the PIO function(s). The Evaluator needs to understand not only response techniques but also media procedures. Local media members or county personnel who have fulfilled the PIO role make good Evaluators for this Objective.

The Exercise Design Team will need to designate where this Objective will be evaluated. On-scene, the Evaluator can observe the Command Post and it's interaction with local media assets but will likely shadow the PIO and observe media briefings. Off-scene, there may need to be an Evaluator to watch how this function is managed at an activated JIC or EOC. Evaluators should

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be reminded that they may need to query media Players and determine what information has been released to them to understand what response personnel have/have not said. Finally, the Evaluators should note when too much simulation was used to demonstrate the Objective and bring that to the Facilitator's attention. If too much simulation is accomplished, the Facilitator may choose to withdraw the Objective from the exercise and direct the LEPC to re-test it at a later exercise.

This Objective is well-suited to be evaluated along with Objective #8.

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Objective #10	**Traffic and Access Control** Demonstrate, or discuss in a tabletop exercise, the ability to implement site security, designate evacuation routes, control traffic flow, and manage evacuation area site access.

A Basic Intent

Because of the risks associated with hazardous materials, access to and around the incident must be strictly controlled. Responders will need ample space at the scene to work and keep the general public away from the area. Meanwhile, public protective actions will require the surrounding area to be evacuated. Evacuation routes and alternate traffic routes will be established. Security must be provided for those areas not evacuated. This will require the coordination of multiple law enforcement groups and will involve state and local transportation department assets.

B Discussing the *Points of Review*

1. *Was an individual clearly identified and effectively in charge of coordinating traffic and access control issues?*

To manage the incident, the IC may coordinate traffic control for a small incident. In larger events, the IC should delegate this task to a law enforcement official that has jurisdiction over the area. Mutual aid departments must be briefed on who is managing this task. Also, this liaison may manage the task away from the Command Post and therefore needs to routinely coordinate actions with the IC. If an EOC is tasked to coordinate off-site support, the liaison needs to regularly coordinate actions with them.

2. *Was site security effectively implemented at and around the immediate scene and only authorized personnel allowed access to the scene?*

Response measures should permit clear access to and from the scene for response vehicles. The area should also be large enough to setup a Command Post and allow movement within the cold or support zone. Roadblocks, traffic cones, and barrier tape are tools often used to secure the scene. Access from open fields and back alleys may need to be monitored. Also, some vehicles or the general public already in the area may need to be removed. The traffic control personnel and staging officials will need to work together so they know what response resources are en route and are allowed access to the scene. This especially applies to those assets which are not First Responders such as private cleanup contractors, state officials, or personnel arriving in private vehicles. It will also require establishing access and control procedures and/or guidelines for media assets who may respond to the incident. The liaison will need to work with the PIO to establish a media area that permits media coverage of the incident without interfering with response operations.

3. *Did personnel determine where and how to control transportation around and away from the incident (to include via road, rail, air, and water)?*

Responders may initially consult NAERG technical guidance, but the IC may need to revise those estimates based on the incident assessment. The IC and traffic liaison will need to identify traffic control points that will secure the area around the warm or contamination reduction zone. The steps and resources needed to re-route traffic, especially along state or US highways, will

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need to be clearly defined. This will likely involve posting roadblocks and establishing detours for the area and require the support of local transportation offices such as city road departments, ODOT, or the County Engineer's office. Rail lines may transit the impacted area and require responders to notify appropriate agencies how to stop movement along a given line. As for air traffic, ground personnel can restrict the airspace above an incident. Therefore, they need adequate communications to manage arriving aircraft, such as life-flight or stray aircraft (media). Finally, access via water may be difficult to manage. Access control may range from canoeists on a small stream to large barges on a major lake or river.

4. *Were traffic and access control decisions disseminated to the general public and updated as the incident response changed?*

This information should come from the individual assigned to traffic issues through the PIO in coordination with the IC. Traffic controllers should relay any public concerns promptly to the liaison that can then have the PIO address the concerns. Public information messages should clearly outline traffic closings, evacuation area boundaries, and alternate traffic routings. This should also include a note on the expected length of any delay. As the situation changes, the PIO must ensure the public is kept informed.

5. *Did the IC and traffic controllers evaluate the effectiveness of traffic control measures throughout the incident and adjust them when necessitated by the incident response?*

Initial actions may be based on guidance found in the NAERG (orange DOT guidebook) technical guidance. The traffic control measures should ensure the public is kept clear of the scene to include any downwind warm or contamination reduction zones. Once a protective action is implemented, personnel should demonstrate how they evaluate and resolve issues as the incident progresses such as redefining traffic detours and adding additional control points. Effectiveness could be measured by technical applications, social media and calls into dispatch centers. The IC and traffic liaison should work with Operations personnel to identify when and how traffic control measures are relaxed or expanded. Weather changes may create the need to expand the evacuation area and thus close additional routes. The incident may worsen and force more road closures. Any such changes should be shared with personnel as the need arises.

6. *Was the decision to terminate traffic control measures coordinated among responders, support organizations, and to the public?*

Eventually, conditions will improve and permit a gradual return to normal operations. Responders need to demonstrate how they determine that the hazard has been reduced and the area is free of contamination. The Command Post should then outline how they will conclude traffic control measures and pass this information along to traffic control personnel/agencies. This information should also be passed along to the public and media. These actions should be demonstrated before the drill ends, and not just simply stated that it was done.

7. *Were communications between traffic controllers and the command system effective to coordinate actions throughout the incident?*

The liaison will need to establish a clear line of communications with the various assets implementing traffic control. Responders should demonstrate the use of radios and phones to pass critical information among traffic control personnel/agencies. This may require that some agencies (local road department, ODOT, OSHP) will have to provide a liaison to the Command Post that can help identify needs, mobilize assets, and facilitate the communications to their

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personnel. If an EOC is tasked to coordinate these off-site actions, they need to show they can communicate with the traffic controllers/agencies.

8. Were records kept to document resources expended and actions taken?

The traffic liaison should maintain a log of what traffic control actions were implemented to include any concerns that occurred and how they were resolved. The logs should note what routes are closed and which roads are the designated alternate routes. The logs should identify or account for what assets are currently in-place to manage the traffic flow. As with other documentation, these logs can be used to identify response needs, prioritize the use of assets, and confirm actions were taken as planned. Afterwards, the logs will help to critique response operations and should identify the costs incurred.

9. Were the actions taken based on existing plans and/or operating procedures?

The LEPC plan is required to address transportation issues as it pertains to evacuation control, to include establishing alternate traffic routes. Also, some hazard analyses identify likely traffic control points for fixed facility incidents. The County EOP also addresses basic traffic control issues in various Annexes, such as Law Enforcement, Evacuation, and Engineering & Public Works.

C Exercise Design and Control Issues

The basic need of this Objective in any exercise is that the scenario must adversely affect local transportation routes. It can simply affect road traffic, but it should ideally impact multiple transportation corridors. This means the Exercise Design Team will have ample Players participating in the drill to carry out all of the defined Points of Review. The Exercise Design Team should not make the scenario so small that it only requires traffic control at the scene itself and thus only a few traffic personnel are deployed. In this case, the Objective is not being fully tested.

This is a good Tabletop exercise Objective. It allows Players to fully discuss the logistic challenges and time constraints posed by the scenario. Field exercises are often limited by time and personnel restrictions, which mean the Objective is not fully demonstrated. The Controller will need to have a series of access and control issues to create discussion of these Points.

For Functional and Full-Scale exercises, the exercise should be conducted in a location that permits Players to physically close routes and establish alternate routes. As for actually closing routes, advance coordination must be completed so that all involved groups understand the closure. The public should be informed in advance that routes might be closed for a specified time due to a training exercise. Try not to block access to key business centers unless it is mutually agreed to by local business owners.

It is also recommended that the exercise should not close main transportation corridors (interstates, major state routes, rail lines, etc.). If roads are not to be closed, one technique can simulate road closings but still require responders to physically address the situation. Responders would be required to go to each traffic control point and post a flag or traffic cone at the location. That action will simulate the road as being closed and to show that appropriate personnel and equipment were mobilized.

For rail lines or airspace control, Players will not actually stop or limit traffic. Instead, they should contact the key agencies who control those assets and then simply brief them that an

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exercise is occurring with no further action being needed.

D Evaluation Needs and Issues

The Evaluator for this Objective should understand what challenges are created when implementing traffic and access control issues. This will typically be someone with a law enforcement background or possibly a transportation department with response experience.

The Evaluator will need to be mobile to observe how personnel in the field are managing traffic flow and security issues. If there is extensive field play, this Objective may require multiple Evaluators. The Evaluator(s) should also be provided a communications capability that can monitor the coordination between the Command Post and field personnel. The Evaluator should also observe the actions taken within the Command Post to determine which routes will be controlled and how.

This Objective may be evaluated along with Objective #8 depending on the amount of field play.

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Objective #11	**Shelter Management** Demonstrate, or discuss in a tabletop exercise, the adequacy of procedures and/or guidelines, facilities, equipment, and services to provide for the anticipated protective action and sheltering needs of evacuees.

A Basic Intent

Hazardous material incidents often force the evacuation of the surrounding area. When this occurs, responders need to offer assistance to those who were forced from their homes. {Nationally, the American Red Cross (ARC) is tasked to coordinate this support.} Locally, support also comes from a variety of human service. This Objective should demonstrate how those agencies identified in the shelter plan is are mobilized and works together with various plan partners to care for those impacted by a chemical release.

B Discussing the *Points of Review*

1. *Were an adequate number of shelters/reception sites activated in a timely manner in order to care for the number of evacuees involved?*

When it is decided to evacuate, the IC, or designee, needs to mobilize the lead shelter organization (i.e. ARC) who will shelter the evacuees. The IC will need to inform ARC shelter officials on how many persons may be impacted by the evacuation order. The IC should also identify if this scenario will require long-term or overnight housing. The shelters must be located well clear of the hazard area especially if the situation on-scene were to worsen. Each of these concerns will allow the ARC shelter officials to determine which shelter(s) should be opened.

2. *Were procedures and/or guidelines in place in case the shelter's capacity was exceeded or its location had to be changed?*

The ARC lead shelter organization typically has a number of sites available to open as necessary. They should be anticipating when and why the current shelter will no longer support this operation. For example, the shelter may have been too close to the evacuated area. A wind shift may force the evacuation of the shelter itself. Also, the evacuation may go from a daytime event to an overnight situation. This may have more people seeking beds than were originally registered.

3. *Were there sufficient staff and support agencies at the shelter to support operations?*

Initially, the ARC shelter officials should let the IC know how long it will take before a shelter can be opened. This may require responders to setup a temporary reception center where evacuees can go for initial information and instructions until the shelter opens. Once open, the shelter should have sufficient personnel available to meet and register evacuees. There should also be support staff to feed and care for evacuee needs such as human services, local health department, EMS, or mental health personnel.

4. *Did the shelter have adequate communications with appropriate on-site and off-site support agencies?*

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Shelter operators officials should have communications with on-scene personnel and any off-site agencies (EOC, medical facilitiess, and human service groups) who would support shelter operations. The communications used may include phones at the site or via radio communications. If these communications are not adequate, the shelter manager should know and demonstrate how to overcome each problem.

5. *Was security effectively managed at and around the shelter?*

The shelter security should not only prevent disruptions inside the shelter but it also needs to control access from the outside. Evacuees should be directed to a controlled entrance for registration and screening. Shelter managers may decide to use a separate exit to limit possible exposures should someone be contaminated.

6. *Was information about the health and physical hazards posed by the released materials shared with shelter operators officials and evacuees arriving at the shelter?*

In the process of opening the shelter, the IC will need to provide the shelter operators officials some basic information about the incident. Shelter operators officials should be briefed on what chemicals are involved and what physical/health hazards they pose to the evacuees. The IC should provide information on the likelihood that evacuees were exposed or contaminated by those chemicals. Evacuees may have concerns about what hazards are involved. They may not have completely understood or received this information when evacuated. The shelter should provide information that dispels rumors or reassures evacuees about their safety. This should also include the safety of their belongings, such as pets, cars and homes.

7. *Were evacuees screened for possible exposure/contamination and then safely handled, decontaminated, and given medical assistance if needed? Were risks posed by potential contamination adequately considered and addressed, if needed, to protect shelter operations?*

The local plan establishes how pre-coordination and collaboration will occur between IC and the lead shelter organization on preventing shelter contamination and ensuring safe operations. The shelter operators officials should understand how to screen or determine if the evacuees are showing signs or symptoms of being impacted by the materials. Evacuees can then be queried about their exposure concerns as they register or this can be done before they enter the site, if able. Shelter personnel should be instructed on how to safely handle those who are potentially contaminated, to include whether or not PPE should be worn. The IC and ARC also need to pre-coordinate on how evacuees will be decontaminated and given medical support if they had been exposed. A decontamination station may be setup right at the shelter or victims may be transported to either the scene or a medical facility for decontamination and medical treatment. The shelter should isolate these individuals until they are given proper medical attention. Finally, the initial screening should identify whether or not the evacuee's vehicles were potentially contaminated. If so, a system should be established to decontaminate or isolate those vehicles. Shelter management should contact ICP at any time they feel there is a contamination concern at the shelter.

8. *Was information about the incident status updated and shared with shelter operators officials and evacuees in the shelter?*

The IC/EOC should routinely update the shelter on the status of the response. In turn, the shelter's staff should update evacuees on the status of the release. Shelter personnel can also

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query the IC if they are unsure about the current status or need information to address evacuee concerns. This may include information on how long the evacuation will continue, what precautions are needed when they return, or whether food/water supplies are safe to use. Shelter operators officials may wish to establish a routine time interval to receive or request updates from the scene/EOC.

9. Did personnel ensure the shelters were free of contamination before the sites were closed and returned to normal operations? Did shelter officials demonstrate the ability to screen incoming shelter clients/evacuees for potential chemical contamination or exposure?

Before closing the shelter, personnel should have a process to determine if the shelter requires any type of decontamination. This will depend on whether evacuees were actually contaminated and if there is chance of secondary contamination. The shelter should coordinate with the IC to address this issue. Screening is important so that other evacuees, personnel and the shelter are not impacted by secondary contamination or exposure. Procedures should be implemented per lead shelter organization protocol.

10. Were records kept to document resources expended and actions taken?

This documentation is not just about the registration information. The shelter manager should also note hazard-specific information such as the initial precautions and hazards information relayed by the IC, or designee. They should note which evacuees, if any, were exposed and/or contaminated. They should note what actions were taken to care for those individuals and staff personnel. Finally, they should note what actions were taken to ensure the facility was not contaminated before it returns to normal use/operations.

11. Were the actions taken based on existing plans and/or operating procedures?

These procedures should be addressed in local ARC plans and procedures and/or guidelines. The LEPC's plan may also address these procedures and/or guidelines or may refer to an ARC a lead shelter organization plan. Meanwhile, the county's EOP typically has a chapter that addresses Sheltering operations. Finally, the LEPC's hazard analysis may be used to identify what shelters would be used if there were a release from a fixed facility.

C Exercise Design and Control Issues

The exercise scenario must require responders to evacuate an area surrounding the incident where off-site exposure is likely but not necessarily certain. Also, the chemicals involved should pose an airborne hazard. The Exercise Design Team should then designate a random number of evacuees who were just exposed (but not contaminated) or who are contaminated with signs of illness from their exposure. These individuals will then be scheduled to arrive at the shelter in differing times so shelter operators can address the Points throughout the exercise. This function is different from the role general public can provide under Objective #8 (Population Protective Actions). Those evacuees are not required to be exposed or contaminated, they simply need to evacuate. For this Objective, the evacuees must be exposed to varying degrees.

For Tabletop exercises, the exercise Controller will have to either role play or input the clues as to how the evacuees were exposed. The Controller will randomly input problems to the IC and the shelter operators officials on the impact to the general public. The Players will need to outline the process used to handle the contaminated victims.

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For Functional or Full-Scale exercises, a shelter must be established per the lead shelter agency's guidelines- to include deployment of equipment and personnel. tThe Exercise Design Team will need to secure volunteers to act as evacuees who have been exposed or contaminated. The signs and symptoms can be obvious or Players can wait until they are specifically asked. Symptoms can also be delayed. The evacuees should be staged together with an exercise Controller. The exercise Controller should then randomly release groups and individuals to report to the shelter. Again, evacuees should arrive at staggered times and not all at once.

Since shelters are not activated on a routine basis, the Exercise Design Team should solicit the support of each agency that would provide a service at the shelter. The exercises will then act as refresher training and allow these groups to provide their service in a disaster setting. To make the training useful, there should be sufficient volunteers available to act as evacuees.

D Evaluation Needs and Issues

The Evaluator for this Objective must understand shelter operations and the needs of evacuees. This person can come from groups like the ARC, Salvation Army, or government human service agencies. This person will locate at the activated shelter. If more than one shelter will be activated and evacuees arrive with chemical-related problems at both sites, there should be an Evaluator at both sites.

The Evaluator's focus of the review will be at the shelter, but should also address the coordination between the shelter and the command system. This coordination may occur between the shelter and either the Command Post or the activated EOC. It should also look at how well the various agencies work together to care for evacuees.

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Objective #12	**Emergency Medical Services** Demonstrate, or discuss in a tabletop exercise, the adequacy of procedures and/or guidelines, facilities, and equipment to handle, treat, and transport victims involved in a hazardous materials incident.

A Basic Intent

It is crucial for responders to identify to what extent the released materials have contaminated the victims. Medical personnel will then need to outline what steps will be taken to safely rescue and treat the contaminated victims versus those not contaminated. Throughout, medical personnel will need to minimize the possibility of exposure to themselves or their equipment.

B Discussing the *Points of Review*

1. *Were proper procedures demonstrated by EMS personnel to safely approach the scene?*

Medical personnel may in fact be the first on-scene. As such, they should demonstrate that they recognize the presence of hazardous materials. Personnel should not commit resources until it is determined where it is safe to operate, which victims require decontamination, and what protective equipment is required.

2. *Were EMS operations effectively coordinated on-site and with the command staff?*

The IC should designate an EMS officer to take charge of EMS operations. The EMS liaison officer should clearly identify or be briefed on what hazards are involved. In turn, the EMS officer should ensure all EMS personnel understand the hazards, where it is safe to work, and what precautions should be taken while handling victims. The EMS liaison officer will be responsible to establish the medical priorities to include where to receive victims, how to separate contaminated from non-contaminated people, where to stage equipment for use, and how to account for medical safety on-site. This requires close coordination with the Operations and Safety officers. EMS personnel should also designate a squad to directly support the Hazmat Team and/or entry/decon personnel.

3. *Were the health hazards and the secondary contamination risks posed to patients identified by responders?*

Exposed victims may or may not be contaminated. EMS will need to coordinate with Operations to identify the extent of contamination for each victim. EMS personnel should also understand what type of decontamination was provided. EMS personnel need to understand the likelihood of a secondary exposure or contamination. EMS personnel will need to research these issues using tools beyond the DOT guidebook. Tools/resources can include chemical textbooks or SDS, computer programs such as CAMEO or TOXNET, or contact with specialists such as Poison Control, Toxicologists, or Hazmat Team members. computer technology-based programs (i.e. Cameo), shipping papers, SDS, pre-planned hazard analyses, chemical handbooks (i.e. NIOSH pocket guide, or chemical specialists (i.e. Chemtrec). Assistance can also come directly from the spiller or company that uses the material, hazmat team members, or from the local medical facility and/or health department.

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4. *Were adequate medical equipment and supplies identified and/or obtained to support EMS operations?*

As EMS personnel establish their medical priorities, they should determine what medical assets are needed on-scene. EMS personnel shall determine what PPE are appropriate to receive, handle, treat, and transport victims. They should recognize the limitations work uniforms and structural fire gear provide in preventing contamination. Contamination controls may require lining the interior of squads with plastic, donning Tyvex suits, or using body bags to wrap victims for transport. EMS personnel may also need basic medical supplies such as additional backboards to move contaminated victims. This requires EMS personnel to understand the hazard, what precautions to take, and thus what resources are need to minimize the hazard. EMS personnel also need to determine what equipment is or may become contaminated and thus will need to secure replacement supplies.

5. *Were existing/established medical triage procedures properly implemented based on the to address the contamination risk, if present?*

Victims may or may not be recovered by EMS personnel. If not, rescuers/entry personnel who are assisting EMS need to be briefed on how to conduct triage determine if patients are contaminated. They should know the likely routes of entry, the signs and symptoms of exposure, and whether injuries or chemical exposure takes precedence in recovery. EMS may complete the medical triage for the walking wounded who have received a gross decontamination.

6. *Were patients decontaminated before being treated and appropriate steps taken to prevent exposure/secondary contamination?*

Decontamination will be required for those exposed or contaminated. The amount and type vary on the materials involved and the type/length of exposure. EMS personnel should know which victims required decontamination, and what type they received before treating them. Then in preparation to transport victims, EMS personnel should note whether or not the squads require protection from possible secondary contamination. Techniques include using plastic sheeting to line the inside of the squad or to fully wrap the victim. Personnel may want to only use one or two squads to shuttle the decontaminated victims to the medical facility. This will leave other vehicles clean and able to transport those who were not contaminated. As a side note, EMS personnel may decide to transport victims via air ambulance. In this case, EMS personnel should be aware that some carriers will not transport victims who have been contaminated with either a flammable or poison. And it does not matter how extensive the decontamination was. EMS personnel should be familiar with their local carrier's restrictions when determining who will be airlifted.

7. *Was the Hospital Medical Facility notified in a timely manner prior to patient arrival that a hazardous material incident had occurred to include information on the respective health hazards?*

The Evaluator should note who, how, and when this notification occurred. The notification may be made by on-scene personnel, through dispatch personnel, or only via EMS squads after they are en route to the facility. It should also be noted if the medical facility monitored response radios to learn of the emergency. In this case, the facility could be proactive and directly contact responders instead of waiting for an "official" notification. The notification should include the identity of the chemical involved and an estimate of the injuries to include

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chemical exposures. If the Medical Facility does not have adequate information about the hazards, they should request it from the IC. Information should include specifics on routes of entry, length of exposure, health symptoms, decontamination needs, etc.

7 8. Did personnel coordinate with medical facilities to receive patients to include providing information on decontamination and potential walk-ins?

EMS personnel should understand which facilities locally can or cannot handle victims involved in a chemical incident. These facilities may include those that exist outside of the County. EMS personnel should make contact with each medical facility to ensure they can accept the victims or determine they should go to an alternate site. EMS personnel should brief the medical facilities on what chemicals were involved, what contamination occurred, what decontamination occurred, along with basic patient information. This information should be provided before the patient leaves the scene. This will give medical facilities time to prepare their people and equipment. EMS personnel should also confirm which entrance they should use to deliver the patients to the medical facility. Some sites may require contaminated victims to arrive at a specific entrance. This should be pre-planned but should be confirmed while on-scene or relayed to squads while en route. This function is sometimes handled by dispatch centers if on-scene personnel request it.

8 9. Were emergency medical personnel and equipment screened for contamination before returning them to service or were arrangements made to secure other assets?

Upon arrival, the EMT EMS personnel should be checked for signs of exposure and possible contamination. EMS personnel should request the medical facility to quickly screen them for symptoms of exposure before they return to service. If symptoms are present, EMS personnel should be held for treatment and observation. In this case, they need to advise the IC or the on-scene EMS Officer that they are out of service. The command system will need to take steps to secure additional assets.

910. Were records kept to document resources expended and response actions taken?

To assist in coordinating EMS operations, the EMS liaison should document various items. NFPA's 473 standard notes that this information should include product information, extent and duration of exposures, actions taken to limit contamination, treatment rendered, and patient disposition. Personnel should also note what resources were contaminated and expended. This documentation should help to prioritize medical needs, manage safety concerns, recover costs afterwards, critique operations, and identify training needs.

1011. Were the actions taken based on existing plans and/or operating procedures?

Overall, these actions are required to be contained in the LEPC plan. These procedures and/or guidelines may also be outlined in department SOPs. In either case, Awareness Level training tells personnel not to take action until they are briefed on the hazards and what precautions should be taken to support operations.

As a side note, this Objective is addressed specifically by NFPA's 473 standard. It outlines the training and procedures medical personnel should adhere to while operating in either the cold or warm zones. This standard should be reflected in the LEPC plan, local SOPs, and local

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training.

C Exercise Design and Control Issues

This Objective requires the exercise scenario to have sufficient numbers of victims with varying degrees of exposure, contamination, and injury. The scenario must involve the victims becoming contaminated. One or two victims will not permit a complete test of the EMS procedures and personnel in this Objective.

For Tabletop exercises, the exercise Controller will need to outline the injuries of each victim so the Players can respond accordingly. The Controller should provide victim information for a few patients at a time to reflect the reality of how many victims can/will be extricated from an actual scene. For example, the initial response may generate a half dozen walk-out victims and two victims who were carried out, later four more are brought out, and still later two more are brought out. Do not give the status of all the victims at the onset of the exercise. This will facilitate a more thorough discussion of response operations and the coordination between entry, decon, and medical facility personnel with EMS personnel.

For Functional or Full-Scale exercises, there will need to be ample victims to fully test available EMS and medical facility personnel. Victims should be moulaged or wear tags that identify the subtle signs of chemical exposure. Exercise Controllers may need to tell the EMS provider an EMT about the victim's injuries if the moulage or tags are not immediately clear. There should also be a good mix of injuries and levels of contamination. Some victims should be able to walk clear of the scene with minimal exposure while others heavily contaminated needing immediate rescue. Again, there should be enough victims who can survive and be treated by response personnel.

This Objective is typically tested along with Objective #7, Response Personnel Safety. This allows fire personnel to setup a decontamination line and extract the victims for EMS personnel. However, this Objective can be completed without using the other Objective. In that case, victims are prepared as if they have just completed decontamination or have come directly out of the hazard area. Controllers directly control the flow of victims to the EMS sector. The Controllers will have to address any questions EMS personnel have and would expect the decontamination or safety personnel to answer.

One last note, vVictims should be prepared to actually be decontaminated by First Responders. This means they should wear clothing that can be removed or cut from the body. A bathing suit is usually worn under the clothing to permit washing during the decontamination, but only if temperatures permit. Do not risk hypothermia is conditions do not permit. Dry clothing should be pre-staged on-scene or available at the receiving medical facility to allow victims to change after their role is complete. The exercise team should also make arrangements to pick-up and/or return victims who were transport to a medical facility from the scene.

D Evaluation Needs and Issues

The Evaluator for this Objective should be an EMT EMS provider and preferably trained to the Operations level. This individual should also be familiar with the ICS. The Evaluator will evaluate actions from where EMS personnel establish triage operations. The Evaluator should observe how EMS personnel identify the hazards and how they determine what actions should be taken to safely work in the area. The Evaluator should also pay attention to how EMS personnel

interact within the command system.

This Objective can be evaluated along with Objectives #2, 7. and 13. If one Evaluator will observe this Objective and #13, the Evaluator will need to first observe enough EMS actions to adequately address its Points of Review and then accompany a squad to the medical facility. This will allow the Evaluator to watch how EMS is received at the medical facility and then to observe the medical facility actions for the remainder of the exercise. It is encouraged that the evaluator first observe on scene activities, then ride along with a squad to the receiving facility to observe the intake process and see how the EMT's are received.

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Objective #13	**Hospital Services** **Medical Facilities** Demonstrate, or discuss in a tabletop exercise, the adequacy of procedures and/or guidelines, facilities, and equipment to receive and treat victims involved in a hazardous materials incident.

A Basic Intent

Medical facilities (hospital or free standing ED) within the County and in surrounding areas differ in their ability to support chemical incidents. This Objective is best suited to evaluate those medical facilities that have trained staff and established procedures and/or guidelines to receive and treat victims of a chemical incident. The facility should have procedures and/or guidelines to establish appropriate contamination controls, have the capability to research the chemical hazards, and be able to provide their personnel with suitable PPE.

B Discussing the *Points of Review*

1. *Was the Hospital Medical Facility notified in a timely manner that a hazardous material incident had occurred to include information on the respective health hazards?*

The Evaluator should note who, how, and when this notification occurred. The notification may be made by on-scene personnel, through dispatch personnel, or only via EMS squads after they are en route to the facility. It should also be noted if the medical facility monitored response radios to learn of the emergency. In this case, the facility could be proactive and directly contact responders instead of waiting for an "official" notification. The notification should include the identity of the chemical involved and an estimate of the injuries to include chemical exposures. If the Medical Facility does not have adequate information about the hazards, they should request it from the IC. Information should include specifics on routes of entry, length of exposure, health symptoms, decontamination needs, etc.

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21. *Were appropriate actions taken to coordinate patient arrival with the arriving emergency medical squads, to include equipping personnel to safely handle arriving patients?*

The medical facility should have a pre-designated area where victims would be delivered and should be confirmed with EMS personnel before the first patient arrives. This is done to limit the chances that a critical area of the facility will be closed due to contamination. Some sites use alternate entrances rather than going straight into the emergency room. Victims may arrive after being decontaminated on-scene or they may arrive on their own without going through a decontamination process. Medical facility personnel should be equipped to protect themselves from possible exposure to any chemicals remaining on the arriving victims. Internal procedures and/or guidelines may dictate that a specific level of PPE will be worn regardless of the situation. Personnel should be trained on the proper manner to don and wear the PPE chosen. The medical facility should also inform EMS or the IC when no more victims can be accepted at the site.

32. *Were arriving patients and EMTs EMS personnel safely received, handled, and treated based on injuries and contamination levels?*

Once EMTs EMS personnel arrive with victims, the medical facility should have personnel in-place and suited to handle and treat victims. They should be ready to decontaminate victims

as needed. They should evaluate EMTs EMS personnel for signs of exposure and treat them accordingly. Squad members should be questioned as to how they feel and what precautions were taken when handling this victim. They should have procedures and/or guidelines in-place to remove and isolate contaminated clothing if needed. They should determine whether to treat the injuries while wearing PPE or move the patient to other medical personnel after the patient is decontaminated. Those not contaminated should be moved directly to a clean area for immediate treatment.

43. Were security measures in-place to control access to the receiving, treatment, or other potentially contaminated areas?

As victims arrive, the receiving area should have a controlled access that limits the possibility of contamination outside of the area. Procedures should be in-place to transfer a patient from a contaminated area into a clean area. Medical personnel should not freely move between each area. Control measures may include closing off access, removing or covering non-essential equipment, and isolating ventilation systems. Outside of the receiving and treatment areas, access should be limited to only essential personnel. Security may even be needed outside of the medical facility to manage the arriving squads, the general public, and possibly media groups.

54. Was the medical facility able to communicate with the incident Command Post and/or EMS officials personnel?

This process requires adequate communications with personnel on-scene. The medical facility should have direct communications to the scene's EMS personnel or the incident Command Post. This may be through cellular phone, dedicated radios, or relayed via dispatchers. The facility should also be proactive to request information rather than waiting for the scene or individual squads to provide information. Internally, the medical facility should have communications to coordinate activities if the receiving area is isolated from other operations. Communications should permit the exchange of equipment and information from the receiving area and the rest of the facility.

65. Were procedures and/or guidelines followed to safely contain and dispose of contaminated materials?

A process should be used to decontaminate those personnel who treated patients and thus may have been exposed to the victims. Runoff from the process should be properly contained for disposal. This process should also address how to handle a patient's personal items or EMS equipment that may be contaminated. Finally, the process should confirm the area is clean before it returns to normal operations.

76. Were records kept to document resources expended and actions taken?

Personnel within the medical facility should take note of various actions relating to this event. This may include notes on what materials were involved, which patients received decontamination on-site, what types of PPE was issued, who wore the PPE and for how long, and how the decontaminated wastes were managed.

87. Were the actions taken based on existing plans and/or operating procedures?

The LEPC plan is required to contain the procedures used by medical facilities to support on-scene operations. These concerns may already be addressed in the medical facility's SOPs. It is

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also noted that OSHA requires Operations Level training for those hospital whose personnel will conduct decontamination operations at the facility.

C Exercise Design and Control Issues

Obviously, this Objective requires the medical facility to receive and treat victims of a chemical incident. The victims should have varying types of injuries and chemical exposures. The number of arriving victims should be enough to fully test the facilities ability to handle the patient load. If multiple facilities are to participate, each should receive a variety of patients. The Exercise Design Team could also arrange for some victims to arrive as walk-in patients. The walk-ins can simulate the evacuated public who believes they were exposed to an airborne chemical.

For Tabletop exercises, the exercise Controller will need to outline the injuries of each victim so the Players can respond accordingly. The Controller should provide victim information for a few patients at a time to reflect the reality of how many victims will arrive via squad. This discussion may stem naturally from the discussion of response operations and victim rescue/treatment by entry, decon, and EMS personnel.

For Functional or Full-Scale exercises, there will need to be ample victims to fully test Medical facility personnel. EMTs EMS personnel need to relay victim's injuries and status before arrival at the medical facility. There should also be a good mix of injuries and levels of contamination. Some victims may even be staged to arrive at the medical facility on their own and thus challenge medical facility procedures and/or guidelines. If there are not sufficient EMS squads to transport victims, the victims may be staged in the medical facility parking lot and then sent to the ER at pre-coordinated intervals.

As a side note, victims should be prepared to be decontaminated by the medical facility. This means they should wear clothing that can be removed or cut from the body. A bathing suit should be worn under the clothing to permit washing during the decontamination. Dry clothing should be pre-staged at the facility to allow victims to change after their role is complete. The Exercise Design Team should also make arrangements to pick-up and/or return victims who arrived to the facility from off-site via EMS squad.

Finally, a real emergency may arise for the medical facility and so there should be a procedure to terminate operations if needed. Some facilities may wish to continue playing the exercise along with managing the real emergency. Some will need to temporarily terminate exercise play and continue after the real emergency is terminated. The Exercise Design Team will need to clearly pre-establish how the decision to halt the exercise will be made.

D Evaluation Needs and Issues

The Evaluator should be familiar with medical facility operations. This can be an emergency room doctor, nurse or emergency manager from the facility or from a neighboring medical facility. This could also be an EMS Personnel with Operations Level training. The Evaluator will be located within the medical facility where victims will be received and treated.

This Objective can be evaluated along with Objective #12. In this case, the Evaluator will first observe the EMS function on-scene and then may go with an EMS squad to the medical facility to observe those procedures.

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OHIO HAZARDOUS MATERIALS EXERCISE AND EVALUATION MANUAL
For use beginning FY22

County:	_____	Date:	_____
Evaluator Name:	_____	Evaluation Location:	_____
Title:	_____	Phone Number:	_____

OBJECTIVE 1 **NOTIFICATION OF RESPONSE/SUPPORT AGENCIES:** Demonstrate, or discuss in a tabletop exercise, the ability to notify response and support agencies, and to mobilize emergency personnel.

POINTS OF REVIEW (Notification)	**Yes**	**No**	**N/A**
1. Were local procedures and/or guidelines followed to document the incident call and to determine if hazardous materials were involved?	☐	☐	☐
Explain:			
2. Were appropriate local personnel (i.e. HM Team, Fire, Police, Medical Facility, and EMA) dispatched and/or notified of the hazardous materials emergency?	☐	☐	☐
Explain:			
3. Were appropriate state and federal agencies (i.e. OEPA, SFM, ODH, PUCO, NRC, Chemtrec, and USCG) alerted and requested to provide support for the hazardous materials emergency?	☐	☐	☐
Explain:			
4. Were the notifications made in a timely manner?	☐	☐	☐
Explain:			
5. Was adequate information about the scene assessment provided to response and support agencies?	☐	☐	☐
Explain:			
6. Were the actions taken based on existing plans and/or operating procedures?	☐	☐	☐
Explain:			

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POINTS OF REVIEW (Notification)	**Yes**	**No**	**N/A**

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County:	_____	Date:	_____
Evaluator Name:	_____	Evaluation Location:	_____
Title:	_____	Phone Number:	_____

OBJECTIVE 2 **INCIDENT ASSESSMENT:** Demonstrate, or discuss in a tabletop exercise, the ability to identify the hazardous material(s) involved in the incident and to assess the associated health and physical hazards.

POINTS OF REVIEW (Incident Assessment)	**Yes**	**No**	**N/A**
1. Did response personnel safely approach the incident scene?	☐	☐	☐
Explain:			
2. Were proper steps taken to safely obtain information about the material(s) involved before committing resources and beginning response operations?	☐	☐	☐
Explain:			
3. Did personnel consult proper technical guidance/resources to obtain relevant information about the hazards involved?	☐	☐	☐
Explain:			
4. Did personnel identify the potential movement and impact posed by the released materials on-site and to adjacent areas?	☐	☐	☐
Explain:			
5. Did personnel use the assessment to identify proper actions to be taken?	☐	☐	☐
Explain:			
6. Was consideration given to the development of protective actions for the public and the environment based on incident assessment?	☐	☐	☐
Explain:			
7. Was the incident assessment transmitted in a timely manner to other response personnel and support groups?	☐	☐	☐
Explain:			

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POINTS OF REVIEW (Incident Assessment)	**Yes**	**No**	**N/A**
8. Were proper strategies/tactics used to continuously assess and monitor the hazards?	☐	☐	☐

Explain:

9. Were changes in the incident assessment transmitted in a timely manner to other response personnel and support groups?	☐	☐	☐

Explain:

10. Were the actions taken based on existing plans and/or operating procedures?	☐	☐	☐

Explain:

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Evaluator Name:	_____	Evaluation Location:	_____
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OBJECTIVE 3 **INCIDENT COMMAND:** Demonstrate, or discuss in a tabletop exercise, the ability to implement an Incident Command System and effectively direct, coordinate, and manage emergency response activities.

POINTS OF REVIEW (Incident Command)	**Yes**	**No**	**N/A**
1. Was an Incident Command System (ICS) clearly identified?	☐	☐	☐
Identify ICS positions used:			
2. Was the Incident Commander (IC) clearly identified and in charge?	☐	☐	☐
Identify by name and agency:			
3. Was an Incident Command Post (ICP) established and clearly identified?	☐	☐	☐
Explain:			
4. Was the Incident Command Post staffed and equipped to support emergency operations?	☐	☐	☐
Explain:			
5. Was decision-making and information-sharing coordinated with on-site personnel?	☐	☐	☐
Explain:			
6. Was decision-making and information-sharing coordinated with off-site agencies?	☐	☐	☐
Explain:			
7. Did the Command Staff consider the need to activate an Emergency Operation Center?	☐	☐	☐
Explain:			
8. Was a system implemented to track personnel and resources on-site?	☐	☐	☐
Explain:			

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POINTS OF REVIEW (Incident Command)	**Yes**	**No**	**N/A**
9. Were records kept to document the response actions taken?	☐	☐	☐

Explain:

10. Were actions taken based on existing plans and/or operating procedures?	☐	☐	☐

Explain:

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County:	_____	Date:	_____
Evaluator Name:	_____	Evaluation Location:	_____
Title:	_____	Phone Number:	_____

OBJECTIVE 4 **EMERGENCY OPERATIONS CENTER:** Demonstrate the ability to utilize an Emergency Operation Center (EOC) to coordinate and support emergency response activities.

POINTS OF REVIEW (Emergency Operation Center)	**Yes**	**No**	**N/A**
1. Were planned procedures followed for activating the EOC? Time Established:	☐	☐	☐
2. Was the activated EOC identified in the plan? Primary: ☐ / Alternate: ☐ Explain:	☐	☐	☐
3. Was an individual clearly identified and effectively in charge of the EOC? Identify by name:	☐	☐	☐
4. Were communications established between the EOC and the incident site(s)? Time established: Explain:	☐	☐	☐
5. Was decision-making and information sharing effectively coordinated between the EOC and the Incident Commander(s)? Explain:	☐	☐	☐
6. Were copies of local plans, SOPs, and/or technical guidance readily available at this location and reviewed (when needed) in support of EOC operations? Explain:	☐	☐	☐
7. Did the EOC, its equipment and displays, support operations? Explain:	☐	☐	☐

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POINTS OF REVIEW (Emergency Operation Center)	**Yes**	**No**	**N/A**
8. Were records kept to document actions taken?	☐	☐	☐
Explain:			
9. Were the actions taken based on existing plans and/or operating procedures?	☐	☐	☐
Explain:			

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Evaluator Name:	_____	Evaluation Location:	_____
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OBJECTIVE 5 **RESOURCE MANAGEMENT:** Demonstrate, or discuss in a tabletop exercise, the ability to identify, mobilize, and manage resources required for emergency operations.

POINTS OF REVIEW (Resource Management)	**Yes**	**No**	**N/A**
1. Were resources needs identified and requested in a timely manner to include resources available via mutual aid agreements?	☐	☐	☐
Explain:			
2. Were resource lists readily available and did ICP/EOC staff obtain accurate information on resource availability?	☐	☐	☐
Explain:			
3. Were actions taken to identify and obtain additional/replacement resources?	☐	☐	☐
Explain:			
4. Were cleanup/disposal actions coordinated with the spiller?	☐	☐	☐
Explain:			
5. Did the ICP/EOC staff effectively track the resources in use?	☐	☐	☐
Explain:			
6. Were records kept to track resources utilized for posterity and in support of the cost recovery effort?	☐	☐	☐
Explain:			
7. Were the actions taken based on existing plans and/or operating procedures?	☐	☐	☐
Explain:			

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POINTS OF REVIEW	**(Resource Management)**	**Yes**	**No**	**N/A**

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Evaluator Name:	_____	Evaluation Location:	_____
Title:	_____	Phone Number:	_____

OBJECTIVE 6 **COMMUNICATIONS:** Demonstrate, or discuss in a tabletop exercise, the ability to effectively establish and maintain communications among all appropriate response locations, organizations, and personnel.

POINTS OF REVIEW (Communications)	**Yes**	**No**	**N/A**
1. Were response and support organizations able to effectively communicate with each other?	☐	☐	☐
Explain:			
2. Were communications effectively utilized to gather and disseminate information about the incident?	☐	☐	☐
Explain:			
3. Were the existing communication links able to handle all necessary traffic?	☐	☐	☐
Explain:			
4. Did personnel take appropriate steps to alleviate the communications problems?	☐	☐	☐
Explain:			
5. Were records kept to document the key communication activities?	☐	☐	☐
Explain:			
6. Were the actions taken based on existing plans and/or operating procedures?	☐	☐	☐
Explain:			

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County:	_____	Date:	_____
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OBJECTIVE 7 **RESPONSE PERSONNEL SAFETY:** Demonstrate, or discuss in a tabletop exercise, the ability to protect emergency responder health and safety.

POINTS OF REVIEW (Response Personnel Safety)	**Yes**	**No**	**N/A**
1. Were proper procedures followed so the arrival at the scene did not expose or contaminate personnel to the on-scene hazards?	☐	☐	☐
Explain:			
2. Was a Safety Officer clearly identified and effectively in control of site safety?	☐	☐	☐
Explain:			
3. Were hazard zones clearly defined and effectively controlled to ensure no one entered a restricted zone without the proper personal protective equipment (PPE)?	☐	☐	☐
Explain:			
4. Was an appropriate level of PPE chosen and issued to personnel who were properly trained to use the equipment?	☐	☐	☐
Explain:			
5. Were personnel, to include arriving mutual aid resources, adequately briefed on the hazards, PPE requirements, and expected response actions?	☐	☐	☐
Explain:			
6. Were proper methods followed to safely control and stabilize the released materials (i.e. use a team approach, use spark-resistant tools, minimize contact, etc.)?	☐	☐	☐
Explain:			
7. Was adequate medical monitoring provided for hot and warm zone personnel to include providing rehabilitation and debriefing on the hazards?	☐	☐	☐
Explain:			

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POINTS OF REVIEW (Response Personnel Safety)	**Yes**	**No**	**N/A**
8. Were back-up teams identified and readily available to support entry personnel?	☐	☐	☐
Explain:			
9. Were procedures followed to safely account for and track all response personnel on scene?	☐	☐	☐
Explain:			
10. Was an effective means of communications utilized between the IC, Safety Officer, decontamination personnel, and entry personnel to safely conduct operations?	☐	☐	☐
Explain:			
11. Was an established process used to decontaminate personnel and their equipment?	☐	☐	☐
Explain:			
12. Were contaminated wastes controlled and properly held for later disposal?	☐	☐	☐
Explain:			
13. Were records kept to document the key response operations?	☐	☐	☐
Explain:			
14. Were the actions taken based on existing plans and/or operating procedures?	☐	☐	☐
Explain:			

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OBJECTIVE 8 **POPULATION PROTECTIVE ACTIONS:** Demonstrate, or discuss in tabletop exercise, the ability to identify and implement appropriate protective actions based upon projected risks posed to the public.

POINTS OF REVIEW (Population Protective Actions)	**Yes**	**No**	**N/A**
1. Did personnel determine how and which geographical areas could be at risk?	☐	☐	☐
Explain:			
2. Was an appropriate protective action decision made based on the risks posed and the area to be impacted?	☐	☐	☐
Explain:			
3. Were protective actions implemented in a timely manner and effectively coordinated among organizations?	☐	☐	☐
Explain:			
4. Were media alert/notifications implemented in a timely manner?	☐	☐	☐
Explain:			
5. Was the content of instructions appropriate to the protective action made?	☐	☐	☐
Explain:			
6. Did response personnel take appropriate steps to address access and functional needs groups and special populations?	☐	☐	☐
Explain:			
7. Were proper methods followed to assess/monitor hazards to the general public and environment, and were the protective actions updated as required by changes?	☐	☐	☐
Explain:			

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8. Was the process to return evacuees to their homes effectively coordinated between traffic controllers, shelter managers, and the command system? ☐ ☐ ☐

Explain:

9. Were records kept of protective action decisions made, instructions issued, and actions implemented? ☐ ☐ ☐

Explain:

10. Were the actions taken based on existing plans and/or operating procedures? ☐ ☐ ☐

Explain:

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County:	_____	Date:	_____
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Title:	_____	Phone Number:	_____

OBJECTIVE 9 **EMERGENCY PUBLIC INFORMATION:** Demonstrate, or discuss in a tabletop exercise, the ability to coordinate and disseminate accurate information about the incident to the public and the media in a timely manner.

POINTS OF REVIEW (Emergency Public Information)	**Yes**	**No**	**N/A**
1. Was an individual clearly identified as the lead Public Information Officer (PIO) for this incident and thus was authorized to draft and release information to the public and media based on subject matter expertise provided?	☐	☐	☐
Identify by name: Explain:			
2. Was the content of public and media notifications appropriate to the emergency, response actions taken, and protective actions taken?	☐	☐	☐
Explain:			
3. Were pre-planned alert and notification methods effective?	☐	☐	☐
Explain:			
4. Was the public notification process effectively coordinated among involved organizations?	☐	☐	☐
Explain:			
5. Once created, were media notifications made in a timely manner?	☐	☐	☐
Explain:			
6. Did the PIO remain aware of the emergency situation's status and develop appropriate follow-up messages based on incident changes?	☐	☐	☐
Explain:			
7. Were procedures in place to monitor and respond to the rumors raised during the emergency?	☐	☐	☐
Explain:			

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POINTS OF REVIEW (Emergency Public Information)	**Yes**	**No**	**N/A**
8. Were records kept to document messages issued, briefings made, and actions taken?	☐	☐	☐
Explain:			
9. Were actions taken based on existing plans and/or operating procedures?	☐	☐	☐
Explain:			

Recommendations:

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Evaluator Name:	_____	Evaluation Location:	_____
Title:	_____	Phone Number:	_____

OBJECTIVE 10 **TRAFFIC AND ACCESS CONTROL:** Demonstrate, or discuss in a tabletop exercise, the ability to implement site security, designate evacuation routes, control traffic flow, and manage evacuation area site access.

POINTS OF REVIEW (Traffic and Access Control)	**Yes**	**No**	**N/A**
1. Was an individual clearly identified and effectively in charge of coordinating traffic and access control issues?	☐	☐	☐
Identify by name: Explain:			
2. Was site security effectively implemented at and around the immediate scene and only authorized personnel allowed access to the scene?	☐	☐	☐
Explain:			
3. Did personnel determine where and how to control transportation around and away from the incident (to include road, rail, air and water)?	☐	☐	☐
Explain:			
4. Were traffic and access control decisions disseminated to the general public updated as the incident response changed?	☐	☐	☐
Explain:			
5. Did the IC and traffic controllers evaluate the effectiveness of traffic control measures throughout the incident and adjust them when necessary?	☐	☐	☐
Explain:			
6. Was the decision to terminate traffic control measures coordinated among responders, support organizations, and the public?	☐	☐	☐
Explain:			

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POINTS OF REVIEW (Traffic and Access Control)	**Yes**	**No**	**N/A**
7. Were communications between traffic controllers and the command system effective to coordinate actions throughout the incident?	☐	☐	☐

Explain:

8. Were records kept to document resources expended and actions taken?	☐	☐	☐

Explain:

9. Were the actions taken based on existing plans and/or operating procedures?	☐	☐	☐

Explain:

Recommendations:

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OBJECTIVE 11 SHELTER MANAGEMENT: Demonstrate, or discuss in a tabletop exercise, the adequacy of procedures, facilities, equipment, and services to provide for the anticipated protective action and sheltering needs of evacuees.

POINTS OF REVIEW (Shelter Management)	**Yes**	**No**	**N/A**
1. Were an adequate number of shelters/reception sites activated in a timely manner in order to care for the number of evacuees involved?	☐	☐	☐
Explain:			
2. Were procedures in place in case the shelter's capacity was exceeded or its location had to be changed?	☐	☐	☐
Explain:			
3. Were there sufficient staff and support agencies at the shelter to support operations?	☐	☐	☐
Explain:			
4. Did the shelter have adequate communications with on-site and off-site support agencies?	☐	☐	☐
Explain:			
5. Was security effectively managed at and around the shelter?	☐	☐	☐
Explain:			
6. Was information about the health and physical hazards posed by the released material(s) shared with shelter officials and evacuees arriving at the shelter?	☐	☐	☐
Explain:			
7. Were risks posed by potential contamination adequately considered and addressed, if needed, to protect shelter operations?	☐	☐	☐
Explain:			

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POINTS OF REVIEW (Shelter Management)	**Yes**	**No**	**N/A**
8. Was information about the incident status updated and shared with shelter officials and evacuees in the shelter?	☐	☐	☐

Explain:

9. Did shelter officials demonstrate the ability to screen incoming shelter clients/evacuees for potential chemical contamination or exposure?	☐	☐	☐

Explain:

10. Were records kept to document resources expended and actions taken?	☐	☐	☐

Explain:

11. Were the actions taken based on existing plans and/or operating procedures?	☐	☐	☐

Explain:

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OBJECTIVE 12 **EMERGENCY MEDICAL SERVICES:** Demonstrate, or discuss in a tabletop exercise, the adequacy of procedures, facilities, and equipment to handle, treat, and transport victims involved in a hazardous materials incident.

POINTS OF REVIEW (Emergency Medical Services)	**Yes**	**No**	**N/A**
1. Were proper procedures demonstrated by EMS personnel to safely approach the scene?	☐	☐	☐
Explain:			
2. Were EMS operations effectively coordinated on site and with the command staff?	☐	☐	☐
Explain:			
3. Were the health hazards and the secondary contamination risks posed to the patients identified by responders?	☐	☐	☐
Explain:			
4. Were adequate medical equipment and supplies identified and/or obtained to support EMS operations?	☐	☐	☐
Explain:			
5. Were existing/established medical triage procedures properly implemented to address the contamination risk, if present?	☐	☐	☐
Explain:			
6. Were patients decontaminated before being treated and appropriate steps taken to prevent exposure/secondary contamination?	☐	☐	☐
Explain:			
7. Was the Hospital Medical Facility notified in a timely manner prior to patient arrival that a hazardous material incident had occurred to include information on the respective health hazards?	☐	☐	☐
Time of Notification: Identify by Name Who Made Contact:			
Explain:			

Comment [AMS3]: Moved to #12 EMS

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POINTS OF REVIEW (Emergency Medical Services)	**Yes**	**No**	**N/A**
8. Were emergency medical personnel and equipment screened for contamination before returning them to service or were arrangements made to secure other assets?	☐	☐	☐
Explain:			
89. Were emergency medical personnel and equipment screened for contamination before returning them to service or were arrangements made to secure other assets?	☐	☐	☐
Explain:			
910. Were records kept to document resources expended and response actions taken?	☐	☐	☐
Explain:			
1011. Were the actions taken based on existing plans and/or operating procedures?	☐	☐	☐
Explain:			

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OBJECTIVE 13 **MEDICAL FACILITIES:** Demonstrate, or discuss in a tabletop exercise, the adequacy of procedures, facilities, and equipment to receive and treat victims involved in a hazardous materials incident.

POINTS OF REVIEW (Hospital Services)	**Yes**	**No**	**N/A**
1. Was the medical facility notified in a timely manner that a hazardous material incident had occurred to include information on the respective health hazards?	☐	☐	☐
Time of Notification: Identify by Name Who Made Contact:			
Explain:			
2 1. Were appropriate actions taken to coordinate patient arrival with the arriving emergency medical squads, to include equipping personnel to safely handle arriving patients?	☐	☐	☐
Explain:			
3 2. Were arriving patients and EMS personnel safely received, handled, and treated based on injuries and contamination levels?	☐	☐	☐
Explain:			
4 3. Were security measures in place to control access to the receiving, treatment, and other potentially contaminated areas?	☐	☐	☐
Explain:			
5 4. Was the medical facility able to communicate with the Incident Command and/or EMS personnel?	☐	☐	☐
Explain:			
6 5. Were procedures followed to safely contain and dispose of contaminated materials?	☐	☐	☐
Explain:			
7 6. Were records kept to document resources expended and actions taken?	☐	☐	☐
Explain:			

Comment [AMS4]: Moved to #12 EMS

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POINTS OF REVIEW (Hospital Services)	**Yes**	**No**	**N/A**
8 7. Were the actions taken based on existing plans and/or operating procedures?	☐	☐	☐

Explain:

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TAB C – LEPC EXERCISE NOTICE

1 General

The SERC is required to review the LEPC's annual exercise of their plan. As such, the SERC directed the Ohio EMA to observe each of these exercises. In order to prepare for each exercise, the LEPC must submit information requested by the **LEPC Exercise Notice** as discussed below.

1 Overview of Exercise Notice Form

60-Day Notice - The first page identifies when and where the exercise is to be conducted, who is the point of contact for exercise design, and what will be evaluated during the exercise. This is information that the LEPC should decide upon during its initial exercise design meeting, and needs to be forwarded to the Facilitator following the initial meeting. It is recommended that the LEPC involve the Facilitator during the initial design phase and subsequent exercise meetings. This should ensure the exercise meets the SERC's requirements.

A Date, Time, & Location of Exercise Activities

- County and Date of Event are self-explanatory.
- Time should reflect the time that the exercise will actually start.
- Field Play should identify the location(s) where the exercise play will be conducted. For a Tabletop exercise, this may be the city council's meeting room or the fire department's training room. For a Field exercises, this should identify the specific sites where field play will occur such as at the XYZ Facility shipping yard, an ARC shelter, and the local Hospital.
- If the exercise involves an EOC, identify the name and location of the site. Also, check whether the site is the county's Primary or Alternate EOC as identified in the plan. If no EOC is involved, check "N/A".

Note: For actual events, this section should identify the relevant information about the actual incident.

B Exercise Type

- Place a checkmark next to the appropriate exercise type.
- Identify whether the exercise will be combining activities with other agencies/programs that have differing evaluation criteria (i.e. LEPC, Joint Commissions, Public Health Institute (PHI), or Homeland Security Exercise and Evaluation Program (HSEEP).

Note: As a reminder, actual events do not qualify as Tabletop exercises.

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C Exercise Coordinator

- Identify the primary contact(s) for the Exercise Design Team who can be reached and will clarify questions about the exercise.

Note: For actual events, this section needs to identify the Incident Commander and the County EMA Director. These persons will be contacted by Ohio EMA to discuss and review the incident.

D Objectives to be Demonstrated

- Identify which Objectives will be evaluated for this exercise. Carefully read each Point of Review to ensure the exercise can fully test the Objective. Tabletops will test three to five Objectives, Functionals will test four to seven Objectives, and Full-Scales will test eight or more Objectives.

Note: For actual events, the IC and EMA Director need to determine and identify which Objectives were *fully* demonstrated during the response.

30-Day Notice - The second page identifies what the scope of the exercise will entail to include the scenario, chemical hazard, and principal Players. The second page also identifies who evaluates the exercise. This information will be continuously developed by the Exercise Design Team over time, but must be completed thirty days prior to the actual exercise.

E Hazard Scenario/Narrative - Attach copies of specific information about the exercise along with this form. This information needs to:

- Contain a description of the scenario to include information about what weather conditions will be used for the exercise.
- Summarize the major events and the expected response actions. This is sometimes referred to as a timeline. It shows when the exercise begins, what primary actions will be completed, and when the exercise will conclude.
- Identify what hazardous materials will be involved in the incident. If this is an exercise at a Facility, the materials can be hazardous chemicals on site as regulated by OSHA rules. For transportation incidents, the materials must be the transported cargo that is regulated by USDOT rules.
- The scenario should next identify what geographic areas and general populations are to be affected by the release (i.e. 1/2 mile downwind in rural farmland of 20 homes, 1250 foot radius downtown with 500 residents, etc).

Note: For an actual event, submit a description of the incident to include the above topics. Also, attach any newspaper accounts, incident logs, or other records that documented actions taken during the response.

F Response Participants

- List the various agencies or departments who will act as the Players during the exercise. Provide actual department or representative names, if able.

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- For the "# of Participants", provide an estimate of the total number of response/support personnel that will have an active role during the exercise.
- For the "# of Victims", provide an estimate of how many victims will participate in the exercise.

Note: For an actual event, identify each agency and how many personnel were involved in the incident response and include the actual number of victims.

G Exercise Evaluators

- Provide the name, title, agency/department name and a phone number for each person who is chosen to serve as an Evaluator. The Facilitator will likely need to contact them prior to the exercise and review their role during the exercise.
- For each Evaluator, identify which Objectives they will observe. As a reminder, no Evaluator should observe more than two Objectives. Also, more than one Evaluator can observe the same Objective (i.e. Communications).

Note: If there is not enough space to list all Evaluators, please use a separate page to provide this information.

Note: For actual events, the LEPC should identify the key personnel that were part of the response and might be contacted to review the event. The Facilitator may contact them individually or may meet them as a group in order to review the response versus the chosen Objectives. This will be coordinated with the Incident Commander and the County EMA Director.

2 Submission Deadlines

This information is documented by the Exercise Design Team and then submitted to the SERC Facilitator (Ohio EMA). In order for the Facilitator to actively support the design process, the information is now to be submitted in two parts. The Facilitator will use this process to ensure the exercise requirements are being addressed accordingly.

The **60-Day Notice** must be completed and sent to Ohio EMA not later than Sixty (60) days prior to the exercise date.

The **30-Day Notice** must be completed and sent to Ohio EMA at least Thirty (30) days prior to the exercise date.

Note: To use an actual event in lieu of conducting an exercise, submit the 30-Day and 60-Day Notice together but not later than **Thirty (30) days *after*** response actions were terminated.

3 Frequently Asked Questions

If the LEPC or Exercise Design Team has any questions about what or when to submit, they can contact Ohio EMA's Field Regional Operations Branch at 614-889-7180 7150.

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Ohio EMA is SERC's Exercise Facilitator and will observe each exercise. As such, the LEPC is encouraged to contact Ohio EMA during the initial exercise design phase to ensure the exercise requirements are understood and will be Met by the exercise. They can help with scenario design so that it not only meets SERC requirements but also other exercise requirements such as Terrorism.

For more details on each Objective and its respective Points of Review, the LEPC needs to review Tabs A and B prior to each exercise or submittal for actual incident credit.

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LEPC 60-Day Exercise Notice

A Date, Time, & Location of Exercise Activities: Type or print legality on this document.

County: _____ **Exercise Date:** _____ **Time:** _____

Field Play Locations: _____

_____

EOC: ☐ N/A ☐ Primary ☐ Alternate EOC Location: _____

B Exercise Type:

☐ Tabletop ☐ Functional (FE) ☐ Full-Scale (FS) ☐ Actual FE ☐ Actual FS

Is this a combined exercise which will use differing evaluation criteria? ☐ Yes ☐ No

C Exercise Coordinator:

Name: _____ Title: _____

E-mail: _____ Phone: _____

D Objectives to be Demonstrated:

Tabletop Min. 3 – Max. of 5 Objectives	Functional (FE) Min. 4 – Max. of 7 Objectives	Full-Scale (FS) 8 or more Objectives
☐ 1. Initial Notification of Response Agencies	☐ 8. Population Protective Actions	
☐ 2. Incident Assessment	☐ 9. Emergency Public Information	
☐ 3. Incident Command	☐ 10. Traffic and Access Control	
☐ 4. Emergency Operations Center	☐ 11. Shelter Management	
☐ 5. Resource Management	☐ 12. Emergency Medical Services	
☐ 6. Communications	☐ 13. Hospital Services	
☐ 7. Response Personnel Safety		

☑ This form (page C 5) must be submitted ***at least 60 days*** prior to the date of exercise.

☑ For actual event, both Exercise Notice forms (pages C 5 & C 7/8) must be submitted ***not later than 30 days*** after response actions have terminated.

Email: Send to: Ohio Emergency Management Agency SERC@dps.ohio.gov
Attn. *SERC*
2855 W. Dublin-Granville
Columbus, OH 43235-2206 or Fax: (614) 799-3652

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LEPC 30-Day Exercise Notice – FINAL INFORMATION

E Hazard Scenario/Narrative: Submit the following documents with this form;

- ☐ 1. Scenario – include meteorological conditions, facility, transporter, and product.
- ☐ 2. Sequence of events – also know as an exercise timeline.
- ☐ 3. Type and physical state of hazardous material(s) involved – can be defined in scenario.
- ☐ 4. Geographical area and population affected – can be defined in the scenario.

F Response Participants: Check all that apply. Please type or print legibly.

	Name of person / jurisdiction		Name of person / jurisdiction
FIRE		**MEDICAL**	
☐ Hazmat/Decon	_____	☐ Local EMS	_____
☐ Local Dept.	_____	☐ Local EMS	_____
☐ Local Dept.	_____	☐ Local EMS	_____
☐ Local Dept.		☐ Hospital	_____
☐ Search/Rescue	_____	☐ Hospital	_____
☐ Other	_____	☐ Other	_____
LAW ENFORCE.		**VOLUNTEER**	
☐ Bomb	_____	☐ Amateur Radio	_____
☐ Local Police	_____	☐ Civil Air Patrol	_____
☐ Local Police	_____	☐ Red Cross	_____
☐ SWAT	_____	☐ Salv. Army	_____
☐ Other	_____	☐ Other	_____
STATE		**COUNTY**	
☐ DNR	_____	☐ Coroner	_____
☐ EMA	_____	☐ EMA	_____
☐ EPA	_____	☐ Engineer	_____
☐ Health	_____	☐ Health	_____
☐ National Guard	_____	☐ Job & Family	_____
☐ Patrol	_____	☐ Mental Health	_____
☐ Transportation	_____	☐ Sheriff	_____
☐ Other	_____	☐ Other	_____
ELECTED		**SCHOOLS**	
☐ Commissioner	_____	☐ Local Facility	_____
☐ City/Village	_____	☐ Local Facility	_____
☐ Township	_____	☐ Transportation	_____
☐ Other	_____	☐ Other	_____

☐ Media _____ # Victims:_____ # Participants:_____

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G Exercise Evaluators: Please type or print legibly. Provide all requested information.

Recommendation – no more than 2 Objectives per Evaluator				
Evaluator Name	Title	Agency/Dept.	Phone Number	Objective #
			- -	
			- -	
			- -	
			- -	
			- -	
			- -	
			- -	
			- -	
			- -	
			- -	
			- -	

☑ This form (pages C 7-C 8) must be submitted ***at least 30 days*** prior to the date of exercise.

☑ For an actual event, both Exercise Notice forms (pages C 5 & C 7/8) must be submitted ***not later than 30 days*** after response actions have terminated.

Email: Send to: Ohio Emergency Management Agency SERC@dps.ohio.gov
Attn. *SERC*
2855 W. Dublin-Granville
Columbus, OH 43235-2206 or Fax: (614) 799-3652

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TAB D REFERENCES

1 General

This Tab lists those materials used to develop this guide. These materials can be consulted to learn more about hazardous materials preparedness as well as conducting exercises. A number of these guides were directly cited in this manual.

2 Manuals

A Federal Emergency Management Agency

- *An Introduction to Exercises*, Independent Study IS-120 A., Course Manual.
- *Exercise Evaluation & Improvement Planning*, Independent Study IS-130, Course Manual
- *Exercise Design*, Independent Study IS-139, Course Manual
- *Hazardous Materials Prevention*, Independent Study IS-340, Course Manual
- *An Orientation to Hazardous Materials for Medical Personnel*, Independent Study IS-346, Course Manual.
- *Exercise Design*, State Course Delivery G120, Student Manual
- *Exercise Evaluation Course*, State Course Delivery G130, Student Manual.
- *Exercise Control / Simulation*, State Course Delivery G135, Student Manual
- *Exercise Development*, Emergency Management Institute Course Delivery E136, Student Manual
- *Exercise Program Manager / Management*, State Course Delivery G137, Student Manual
- *Exercise Controller / Simulator Workshop*, State Course Delivery 250.8, Student Manual
- *Exercise Evaluator*, State Course Delivery 250.9, Student Manual
- *Exercising Emergency Plans Under Title III*, Emergency Management Institute Course Delivery E305.4, Student Manual

B Other

- National Response Team, *Hazardous Materials Emergency Planning Guide*, *NRT-1*, September 2001.
- National Response Team, *Developing a Hazardous Materials Exercise Program, NRT-2*, September 1990.
- Office of Domestic Preparedness, Dept. of Homeland Security, *Homeland Security Exercise and Evaluation Program - Volume I: Overview and Doctrine*, Summer 2003.

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3 Professional Standards

- National Fire Protection Association, *Professional Competence of Responders to Hazardous Materials Incidents*, NFPA 472, 2001 edition.
- National Fire Protection Association, *Competencies for EMS Personnel Responding to Hazardous Materials Incidents*, NFPA 473, 2001 edition.
- National Fire Protection Association, *Standard on Disaster Management and Business Continuity Programs*, NFPA 1600, 2000 edition

4 Acronyms

ARC	American Red Cross
CAMEO	Computer Aided Management of Emergency Operations
CAP	Corrective Action Plan
CFR	Code of Federal Regulations
CP	Command Post – aka Incident Command Post (ICP)
DOT	Department of Transportation
EAS	Emergency Alert System
EHS	Extremely Hazardous Substance
EMA	Emergency Management Agency
EMS	Emergency Medical Service
EMT	Emergency Medical Technician
EOC	Emergency Operation Center
EOP	Emergency Operation Plan
FEMA	Federal Emergency Management Agency
HM	Hazardous Materials
HS	Hazardous Substance
HSEEP	Homeland Security Exercise and Evaluation Program
IC	Incident Commander
ICP	Incident Command Post aka Command Post (CP)
ICS	Incident Command System
JIC	Joint Information Center
LEL	Lower Explosive Limit
LEPC	Local Emergency Planning Committee
MSDS	Material Safety Data Sheet
NAERG	North American Emergency Response Guidebook
NFPA	National Fire Protection Association
NIOSH	National Institute for Occupational Safety and Health
NRC	National Response Center
NRT	National Response Team
OAC	Ohio Administrative Code aka “Rule”
ODH	Ohio Department of Health
ODNR	Ohio Department of Natural Resources

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ODOT	Ohio Department of Transportation
OEPA	Ohio Environmental Protection Agency
Ohio EMA	Ohio Emergency Management Agency
OHM-EEM	Ohio Hazardous Materials Exercise and Evaluation Manual
ORC	Ohio Revised Code aka "Law"
OSC	On-Scene Coordinator
OSHA	Occupational Safety and Health Administration
OSHP	Ohio State Highway Patrol
PHI	Public Health Institute
PIO	Public Information Officer
PPE	Personal Protection Equipment
PUCO	Public Utilities Commission of Ohio
SCBA	Self-Contained Breathing Apparatus
SERC	State Emergency Response Commission
SFM	State Fire Marshall
SFY	State Fiscal Year
SOG	Standard Operating Guideline
SOP	Standard Operating Procedure
TOXNET	Toxicological Data Network
USCA	United States Code Annotated
USCG	United States Coast Guard
USDOT	United States Department of Transportation

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Process for designating a facility subject to the plan under ORC 3750.05 for Exercise Purposes

1. LEPCs make a written request using "designation form" (developed by OEPA Legal and AGO-See attached form). The request should be a formal request from an LEPC, and include a copy of the resolution to forward the request to the SERC. (Present at SERC Meeting)

2. SERC determines that participation in the emergency planning process under 3750.04 and 3750.05 is necessary and appropriate to protect public health or safety or the environment, based on: 1) the size of the facility; 2) the nature of its operations; or 3) its proximity to a residential area or an area where significant numbers of people work or congregate. 60% of voting members of the SERC approve in order to designate a facility. (Discuss and Determine at SERC meeting. If yes, send written notice to owner/operator and public notice)

3. Written notice to owner/operator and public notice/comment period 45 days before designation of facility.

    a. Owner/operator Notice: certified mail, return receipt requested.
        i. Public Notice/Comment: publication of notice in a newspaper of general circulation in the County where the facility is located.
        ii. Comments sent directly to SERC

4. AFTER notice to owner/operator of facility and public notice/comment period, SERC discusses the comments and votes whether to issue an order to designate a facility subject to the plan. 60% of voting members of the SERC must approve in order to designate a facility. (Discuss comments and vote at NEXT SERC meeting) The Commission may issue orders requiring a facility's participation in the emergency preparedness plan of 3750.04 and 3750.05.

5. Order issued pursuant to 3750.18 and rules adopted thereunder. The order shall be in writing and shall specify what action is required. Notice of the order shall be deemed effective when delivery is tendered at the last known address or the address currently on file with the commission, committee, or fire department for any facility owner or operator subject of the order.

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Ohio State Emergency Response Commission

Local Emergency Planning Committee (LEPC) Requesting SERC for the Issuance of an Order Bringing Facility into Local Planning Process

c/o Ohio EPA, Lazarus Government Center
50 W. Town St., Ste. 700
PO Box 1049
Columbus, OH 43216-1049

Local Emergency Planning Committee Information

LEPC		Name			
Title/Position in LEPC		Phone	( ) -		
Address					
City		State		Zip	-

Designated Facility Subject to Plan

Facility Name					
Address					
City		State		Zip	-
Owner/Operator Name					
Facility Representative		Title			
Phone	( ) -	Email			
Facility Representative Address (if different from facility)					
City		State		Zip	-

Designation Reason

Please check all that apply to designated facility:

- ☐ Size of facility
- ☐ Proximity to residential area
- ☐ Proximity to an area where significant numbers of people work or congregate
- ☐ Nature of its operations

Additional Information

☐ Check if Request is for Exercise Purpose Only ☐ Check if Copy of LEPC Resolution Formalizing the Request is Attached

Signatures

LEPC Chairman Signature	Date Signed / /

Approved 10/7/2016