

California Environmental
Protection Agency

Department of Toxic
Substances Control

TRANSPORTATION PLAN

Preparation Guidance for Site Remediation

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PREFACE

The Department of Toxic Substances Control (Department), within the California Environmental Protection Agency, has the responsibility of managing the State's hazardous waste and site remediation programs to protect public health and the environment. The Department's Site Mitigation Program oversees removal and response actions at hazardous substance release sites in cooperation with other federal, state, and local agencies. The Site Mitigation Program also develops guidance for those involved in the site mitigation process, especially the Department's project managers and the environmental consultants employed by responsible parties or the Department.

This guidance document has been prepared to provide guidelines for the development and implementation of transportation plans for site cleanups that involve off-site disposal, on-site treatment with related disposal, and/or off-site treatment of hazardous wastes/substances.

A transportation plan is, in some cases, required by law. In others, it is needed due to the relative hazard of the material to be transported or necessary to respond to the concerns of the affected communities.

This guidance document should be used as a tool to define the scope of site needs and work. All elements should be considered, but only those that pertain to the set of conditions and circumstances at a site should be emphasized in developing the plans. This document will be periodically reviewed, updated, and revised

as needed. Therefore, we solicit your comments on improving this document. Please send your suggestions to:

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The target audience for this guidance document is the experienced project manager in the State or private sector with at least an educational background equivalent to a Bachelors degree in engineering or the environmental sciences.

The goal of this document is to provide technical and scientifically sound guidance for designing and implementing a transportation plan. The intent is to expedite the site remediation process, by providing assistance in identifying the critical factors that need to be considered in making appropriate, defensible, and protective decisions while striving to control costs. The objective is to narrow the range of options recognizing that some judgment will always be needed to balance specific site investigative needs and cost with protection of public health and the environment.

1.0 INTRODUCTION

Site cleanups that involve off-site disposal, on-site treatment with related disposal, and/or off-site treatment of hazardous wastes/substances will benefit from, and in most cases, require early consideration of transportation issues in the form of a written transportation plan. A transportation plan is, in some cases, required by law. For example, Health and Safety Code Section 25169.3 requires:

"Before hazardous waste is transported from an abandoned site to another disposal site, all of the following conditions shall be met:

(a) The department shall conduct such tests, or cause such tests to be completed by the Responsible party, as are necessary to determine the general chemical and mineral composition of hazardous waste that is being transported.

(b) The hazardous waste hauler shall prepare a transportation and safety plan outlining features and procedures to be used by the hauler to protect the public during the transportation process.

(c) The department shall review and approve the transportation and safety plan.

(d) The hazardous waste hauler shall, under penalty of perjury, certify that he or she will follow the provisions of the transportation and safety plan.

(e) The department shall issue a certificate to the hazardous waste hauler certifying that the transportation and safety plan has been approved by the department. The person transporting the waste shall have the certificate in his or her possession while transporting the waste. Such a certificate shall be shown upon demand to any department official, officer of the California Highway Patrol, or any local health officer.

The term "abandoned site", as used in this section, means an inactive waste disposal, treatment, or storage facility which cannot, with reasonable effort, be traced to a specific owner; a site whose owner has been determined bankrupt or who has not taken corrective action on or before the date specified in an order issued pursuant to Section 25187; or a location where hazardous waste has been illegally disposed.

(f) The requirements of this section shall not apply when the hazardous waste disposal is the direct result of an accidental spill or the department determines that emergency action is needed to protect the environment or the public health."

For all projects involving the off-site or on-site transportation of hazardous wastes/substances, it should be assumed that a transportation plan is necessary to protect public health and safety and the environment. Health and Safety Code Section 25169.3 should be followed when transporting hazardous waste from an "abandoned site" as defined above. For purposes of the approval specified in Health and Safety Code Section 25169.3 (c), a letter from the Department approving the transportation plan will suffice.

The level of effort and detail required to prepare a transportation plan will be dictated by the quantity of material to be transported, the degree of hazard associated with the material, factors related to the site and transport route, and pertinent regulatory issues. **All elements should be considered, but only those that pertain to the set of conditions and circumstances at a site should be emphasized in developing the plans.** Specific concerns for the project manager will often center on vehicle or container selection, loading procedures, site entry and egress, routing, regulatory compliance, investigation derived waste disposal, community concerns, and supervision of transportation activities. Protection of public health and the environment, while retaining efficiency and feasibility, should be the primary objective in the development of the transportation plan.

2.0 PURPOSE

The purpose of the transportation plan is

to minimize potential health, safety, and environmental risks resulting from the movement of material and/or equipment during site cleanup. Transportation plans should be required as part of any removal workplan or remedial action design approved by the Department that has significant off-site or on-site transport requirements.

The purpose of this guidance document is to assist project managers, consultants, and responsible parties in identifying and responding to critical transportation issues and to provide a consistent and adaptable plan format. Each plan should be tailored to meet the specific requirements of the project.

3.0 APPLICABILITY

This guidance is applicable to sites where the Department is conducting remedial activities (a State-lead Site) or overseeing the work of responsible parties (an RP-lead site). The Department's project manager may want to incorporate the transportation plan contents outlined in this document into orders issued or entered into by the Department. For all projects involving the off-site or on-site transportation of hazardous wastes/substances, it should be assumed that a transportation plan is necessary to protect public health and safety and the environment. The Department's project manager for the site will determine when a transportation plan is not necessary and is responsible for adequately documenting such a decision in the site file. A guide to assist the Department's project manager in

making such a determination is included in Appendix A.

A key factor in developing a transportation plan is the evaluation of the hazardous characteristics and quantity of the material to be transported. For example, a plan to haul large quantities of slightly contaminated soil is likely to emphasize traffic and routing issues, whereas container selection, labeling, and manifesting procedures may be of greater concern in the transport of a single drum of extremely hazardous waste. The inherent hazards and volume of material will determine the importance and level of detail necessary to evaluate potential community concerns, potential receptor and exposure risks, regulatory issues, health and safety issues, handling operations, personnel training and experience needs, and container, vehicle, and route selection.

The framework governing the transportation of hazardous wastes/substances is broad in scope. All work should be conducted in accordance with all applicable federal, state, and local statutes, regulations, or ordinances. At a minimum, the following should be evaluated for applicability:

- 40 Code of Federal Regulations (CFR) Parts 261 to 265;
- 29 CFR Part 1910.120;
- 49 CFR Parts 100 to 199;
- California Health and Safety Code, Chapter 6.5, Articles 6, 6.5, and 8;
- California Vehicle Code Section 2402.1;
- California Code of Regulations

(CCR) Title 22, Division 4.5, Chapter 12, Article 5;

- CCR Title 22, Division 4.5, Chapter 13, Articles 1-5; and
- CCR Title 8 Section 5192.

A pamphlet entitled "Hazardous Materials Transportation Guides" produced by the U. S. Department of Transportation is included in Appendix B to assist in the evaluation of applicable federal requirements. Other applicable rules may be in place as the result of resolutions passed by the State Water Resources Control Board (and the Regional Boards), Air Resources Board (and the air quality management districts), or local governments. All applicable requirements should be identified during the plan development process.

4.0 TRANSPORTATION PLAN CONTENTS

The content and format of the transportation plan discussed in this section should be adhered to with additional information included as necessary to meet the specific needs of the project. The transportation plan should be brief, concisely addressing the following elements which pertain to the site. The use of tables and maps to summarize and illustrate information is encouraged. A checklist is provided in Appendix C to assist the writer and reviewer in determining if the transportation plan is complete.

4.1 Background

Provide a brief discussion of the location, history, and regulatory status of the site. Include a description of the removal or remedial action with specific tasks outlined.

Include a map of the site as well as a map of the surrounding area with residential, commercial, and industrial areas identified. The map should specifically identify schools, day care facilities, hospital, and other facilities that may house sensitive receptors.

4.2 Purpose and Objective

State the purpose and objective of the plan.

4.3 Characteristics of Waste/Material to be Transported

Describe the waste/material to be transported. Be specific about the appearance, source, approximate quantity, the nature of the contaminants and their associated hazards. State whether the waste/material to be transported is a hazardous waste/substance and how the determination was made. Identify any federal, state or local statutes, regulations or ordinances that apply to the transport of the waste/material. State whether any special procedures for handling the waste are required.

4.4 Destination of Waste/Material

Identify the facility(ies) to which the waste/material will be transported. Describe the fate of the waste/material once it

reaches the location(s) (e.g., recycle, dispose, treat). Provide the name, address, phone number and contact person for each facility listed.

4.5 Transportation Mode

Discuss in general how the waste/material will be transported (e.g., truck, rail). It may be appropriate to describe the types of vehicles and containers that will be used to haul a given material. Identify the capacity and special features to prevent releases (e.g., dust covers) for each vehicle type. The transporter should be identified as early as possible. Prior to implementation of a transportation plan, the transporter should be identified. If the waste/material to be transported is a hazardous waste, the transporter should submit proof of valid hauler registration. The responsible party should ensure that all vehicles utilized for hazardous waste transport are properly registered, operated, and placarded in compliance with local, state, and federal requirements.

4.6 Route

Describe the primary and alternate routes to be used during transport. Discuss why these are the preferred routes in terms of avoiding residential areas, peak traffic hours, hazardous road conditions, etc. Include maps of the entire route that clearly identify routine stops (e.g., weigh stations), emergency response resources, and repair facilities along the route. Features of the proposed route that require attention include the location of enforcement and emergency

response resources and jurisdictions, potential road and traffic hazards, population centers in route, and features of the route itself such as restrictions, load limitations, bridges and tunnels. Verify that access to the designated routes are not restricted by the California Highway Patrol (CHP), local ordinance, or road maintenance activities.

Estimate round trip time from the site to the facility. Variations due to rush hour traffic should be evaluated. State the anticipated maximum and average number of round trips required per day. Discuss how many vehicles will be required per day. Provide a schedule for the operation which identifies the period, days, and approximate times of the day trucks will be in operation at the site.

Develop a notification list of emergency service organizations (e.g., fire departments, ambulance services), law enforcement agencies (e.g., CHP, sheriff's departments), and transportation authorities (e.g., Cal Trans, the Public Utilities Commission) that have jurisdiction along the proposed route. Consider notifying all these organizations prior to commencement of hazardous waste/substance transportation activities.

4.7 Traffic Control and Loading Procedures

Discuss the procedures to be used by transportation personnel for entering and leaving the site. Describe any truck staging areas to be utilized near the site. Identify any local traffic problems or hazards.

Consider such elements as rush hour traffic, school children, public transportation, etc. Identify the need for lane closures, traffic signs, flagmen and other traffic control measures. Identify any city and/or county requirements related to traffic controls near the site.

Describe in detail, using maps and diagrams as necessary, on-site traffic and loading procedures. Provide a map and discussion of vehicle routing through the site. The following procedures, if applicable, should also be addressed in detail: how and where loading and covering will occur; where weighing will occur; how and where decontamination will be conducted; and the methods employed to seal/cover cargo containers prior to departure from the site to prevent the release of hazardous wastes/substances during transport. When transporting contaminated soil or powder-like materials, containers that do not have a permanent, fixed cover (e.g., dump truck, rail car) should be sealed with a quick hardening foam, tarpaulin or other appropriate material.

Certain characteristics of the site will have a bearing on the degree of environmental monitoring necessary to monitor for releases of materials. These factors include location, accessibility, environmental features, land use, demography, traffic patterns, public perception, the hours and frequency that transportation will take place, entrance and egress control, and local routing.

All vehicles leaving the site will require inspection to ensure proper loading, covering/sealing, decontamination, placarding and manifesting. Describe how such inspections will be conducted and documented. Provide a discussion of the methods that will be utilized to minimize releases of material during loading and prior to covering/sealing the container. Provide a discussion of how the covering employed will prevent the release of hazardous wastes/substances during the transport to an off-site destination.

4.8 Record Keeping

It will be necessary to identify the date, time, weight/volume, waste/material, trucking company, driver, and vehicles used for each trip. Discuss how such records will be gathered and maintained. Describe the record keeping training or instruction that will be provided to site personnel and vehicle operators.

Identify all transportation documents, specifically those required by law, to be carried with the load. State precisely where such documents will be carried. As appropriate, such documents may include: bill of lading identifying the shipment; analytical results representing the load; hazardous waste manifest; maps and complete instructions describing the route to be traveled; and special instructions including emergency procedures and contacts for the transporter.

4.9 Health and Safety

Describe health and safety procedures during loading as they apply to transportation personnel. All workers should be properly trained in hazardous waste operations in accordance with 29 CFR 1910.120 and CCR Title 8 Section 5192. State the type of health and safety training that will be provided to site personnel and vehicle operators. Describe what the transportation personnel will and will not be permitted to do, based on training, during loading. Discuss how the health and safety plan will be communicated to drivers (e.g., tailgate meetings) and how the plan will be enforced.

Describe notification procedures and contingency plans for accidents or breakdowns in route. Notification procedures should identify key personnel who will be responsible for implementing the contingency plan. Each driver should carry a copy and be able to demonstrate an understanding of the plan. Large-scale removals often involve several independent trucking companies. If this is the case, it will be necessary to identify a transportation coordinator who is accessible 24 hours a day during hauling operations and who has the ability to communicate with and direct the activities of each driver on and off the site. In addition to designating the transportation coordinator, the transportation plan should contain an organizational structure showing the chain of command for all trucking companies involved.

In an effort to plan for potential

containment and cleanup of all on-site accidental releases, include a comprehensive personnel contingency plan which outlines the steps to be taken in the event of injury and/or exposure to contaminants. The personnel contingency plan should be available to all personnel working at the site. Prior to any contractors, subcontractors, and their employees commencing work on the site, the site safety officer should review the plan with them. Identify key personnel and their alternates who will be responsible for on-site safety and response operations.

4.10 Contingency Plan

Include a contingency plan for accidental off-site releases which is distributed to the emergency service organizations, law enforcement agencies, and transportation authorities that have jurisdiction along the proposed route. The contingency plan should, at a minimum, include contaminant descriptions, a hazard analysis, and possible methods for the containment and cleanup of an accidental release. The contingency plan should contain sufficient information for the emergency service organizations to determine if evacuation is necessary. All drivers should carry a copy of the transportation plan and be trained to implement the provisions of the contingency plan for which they are adequately trained and equipped.

Appendix A

GUIDE TO DETERMINING IF A TRANSPORTATION PLAN IS NECESSARY

The primary consideration in making a determination of whether a transportation plan is required for an on-site or off-site remedial action is whether there are significant transportation issues. The obvious transportation factors are the characteristics and volume of material, and distance to be traveled. Factors that are not so apparent but are equally important are community concerns, contamination control, and protection of workers.

The transportation of hazardous wastes/substances may be a part of any removal or remedial action conducted or overseen by the Department. As noted previously, Health and Safety Code Section 25169.3 requires a transportation plan for all "abandoned sites" regardless of the volume of hazardous waste being transported. In the event that the project manager anticipates that a transportation plan will be necessary prior to the Department issuing an order or entering into an enforceable agreement, the contents outlined in this document can be incorporated in the order or agreement. Transportation plans may be required for small volumes of waste/material transport in cases where the responsible party has acted negligently or irresponsibly in the past, community concerns need to be addressed, or there are sensitive environments (e.g., wildlife habitats) along the proposed transportation routes.

Conversely, transportation plans may not be required for large volumes of waste/material in cases where the waste/material is not a hazardous waste and the relative hazard is low, community concerns have been addressed, and the potential for exposure to hazardous wastes/substances is minimal.

Once the determination is made that a transportation plan is unnecessary, the Department's project manager should document this decision in a memorandum placed in the site file. The memorandum can be very brief, however, it should address the following:

- The concentration of contaminants;
- The relative hazard of these Contaminants should they be accidentally released into the environment where they could impact human health or the environment;
- The number of occurrences during which this transportation will take place (e.g., the number of truck loads, the number of times monitoring waste will be shipped, etc.);
- An analysis showing that all potential community concerns have been identified and addressed;
- The quantity of waste to be shipped;
- A brief description of any treatment activities conducted on-site which would reduce the volume or toxicity of the material to be transported off-site; and

- A statement that clearly indicates why a transportation plan is not required.

A. 1 Wastes/Materials Generated During a Remedial Investigation

During a remedial investigation, the following type of wastes/materials may be generated:

- Drill cuttings from the construction of soil borings, piezometers, and monitoring wells;
- Purge water from well development, aquifer property testing and ground water sample collection; and
- Protective clothing and decontamination fluids/materials.

Generally, a transportation plan will not be necessary during the remedial investigation. However, the conditions discussed above may warrant the preparation of a transportation plan.

A.2 Wastes/Materials Generated During Removal Actions/Implementation of Final Remedial Actions

During a removal or remedial action, the following types of wastes may be generated:

- Drums containing material left behind the previous operator;

- Drums containing powdered material that were left by the previous operator;
- Salvage drums containing small packages of wastes/materials;
- Contaminated soil;
- Sludges from unlined waste ponds;
- Plastics or other materials used to contain wastes;
- Contaminated debris; and
- Protective clothing and decontamination fluids/materials.

Generally, a transportation plan will be necessary for a removal or remedial action.

A.3 Wastes/Materials Generated During Ongoing Operation, Maintenance and Monitoring

During an ongoing operation, maintenance, and monitoring program, the following types of waste may be generated:

- Purge water from monitoring wells;
- Filters or spent cartridges from treatment or monitoring systems; and
- Protective clothing and decontamination
- Generally, a transportation plan should be included as a part of the operation, maintenance, and monitoring plan.

Appendix B

"HAZARDOUS MATERIALS TRANSPORTATION GUIDES"

Published by the U. S. Department of Transportation

Appendix C

CHECKLIST FOR REVIEWING TRANSPORTATION PLANS

The purpose of this checklist is to provide a guide for the reviewer in reaching a decision as to whether a specific transportation plan is adequate for approval.

1.0 TRANSPORTATION PLAN CONTENTS:

1.1 Background

- Does the plan identify the site location?
- Does the plan discuss the site history?
- Does the plan discuss the site's regulatory status?
- Does the plan describe the removal or remedial action?
- Does the plan outline the specific tasks of the removal or remedial action?
- Does the plan include a site map?
- Does the plan include a map of the surrounding area with residential, industrial, and commercial areas identified?

1.2 Purpose and Objective

- Does the plan state its purpose and objective?

1.3 Characteristics of Waste/ Material to be Transported

- Does the plan describe the waste/material to be transported?
- Does the plan describe the appearance of the waste/material?
- Does the plan identify the source of the waste/material?
- Does the plan provide an estimate of the quantity of the waste/material?
- Does the plan discuss the physical and chemical nature of the contaminants in the waste/material?
- Does the plan describe the hazards associated with the contaminants?
- Does the plan identify the waste/material as hazardous or non-hazardous?
- Does the plan provide a discussion of the hazardous (or non-hazardous) determination?
- Does the plan identify any federal, state, or local statutes, regulations, or ordinances that apply to the

transport of the waste/material?

- _____ Does the plan state whether any special procedures are required for handling the waste?

1.4 Destination of Waste/Material

- _____ Does the plan identify the facility(ies) to which the waste/material will be transported?
- _____ Does the plan describe the fate of the waste/material once it reaches the facility(ies)?
- _____ Does the plan provide the name, address, and telephone number of each facility listed?
- _____ Does the plan identify a contact person for each facility listed?

1.5 Transportation Mode

- _____ Does the plan identify the transportation mode (e.g., truck, rail)?
- _____ Does the plan describe the vehicles and containers (e.g., roll-off bin, rail car)?
- _____ Does the plan specify the capacity of the containers?
- _____ Does the plan identify any special features (e.g., seals, liners, covers) for each vehicle type?
- _____ Does the plan identify the

transporter(s)?

- _____ Does the plan contain proof of valid hauler registration for the transport of hazardous wastes?

1.6 Route

- _____ Does the plan include a description and map of the primary route?
- _____ Does the plan include a description and map of the alternate routes?
- _____ Do the route maps clearly identify routine stops (e.g., weigh stations)?
- _____ Does the plan include a discussion of why these routes were chosen?
- _____ Does the route avoid, to the extent possible, residential areas?
- _____ Do the hours of transport avoid, to the extent possible, peak traffic hours?
- _____ Does the route avoid, to the extent possible, potentially hazardous road conditions (e.g., night transport, inclement weather)?
- _____ Does the plan specify the emergency response resources along the route?
- _____ Does the plan identify repair facilities along the route?
- _____ Did the preparer verify that the

- _____ routes specified are not restricted by the California Highway Patrol (CHP), local ordinance, or road maintenance activities?
- _____ Does the plan provide an estimated round trip time from the site to the facility?
- _____ Does the plan provide an analysis of variations in trip time due to rush hour traffic?
- _____ Does the plan contain an estimate of the maximum and average number of round trips required per day?
- _____ Does the plan contain an estimate of the total number of vehicles that will be required per day?
- _____ Does the plan provide a schedule for operation which includes the period, days, and approximate times of the day trucks will be in operation?
- _____ Does the plan contain a notification list of emergency service organizations (e.g., fire departments, ambulance services), law enforcement agencies (e.g., CHP, sheriff's departments), and transportation authorities (e.g., Cal Trans, the Public Utilities Commission)?
- 1.7 Traffic Control and Loading Procedures**
- _____ Does the plan discuss procedures/routes to be used by transportation personnel for entering and leaving the site?
- _____ Does the plan describe any truck staging areas including an address for the staging area?
- _____ Does the plan identify any local traffic problems or hazards?
- _____ Does the plan identify the need for lane closures, traffic signs, flagmen and other traffic controls?
- _____ Does the plan provide adequate detail in the use of lane closure, traffic signs, flagmen, or other traffic controls?
- _____ Does the plan identify any city and/or county requirements related to traffic controls near the site?
- _____ Does the plan describe, using maps and diagrams as necessary, on-site traffic and loading procedures?
- _____ Does the plan provide a map and discussion of vehicle routing through the site?
- _____ Does the plan describe procedures for loading?
- _____ Does the plan describe procedures for covering (if applicable)?

_____ Does the plan describe procedures for the weighing of loads (if applicable)?

_____ Does the plan describe how and where decontamination will be conducted?

_____ Does the plan describe the methods employed to seal/cover cargo containers prior to departure from the site to prevent the release of hazardous waste/substances during transport (if applicable)?

_____ Does the plan describe how the load will be covered? Note: for transportation of contaminated soil or powder-like materials by cargo container without a permanent fixed cover, a quick hardening foam, tarpaulin or other appropriate containment should be made.

_____ Does the plan describe procedures for vehicle decontamination?

_____ Does the plan evaluate all the factors necessary to determine the level of environmental monitoring necessary?

_____ Does the plan describe the procedures for inspecting vehicles prior to departure from the site? Note: the inspection should ensure proper loading, covering/sealing, decontamination, placarding and manifesting.

_____ Does the plan describe how such inspections will be conducted and documented?

_____ Does the plan provide a discussion of the methods to be utilized to minimize releases of material during loading and prior to covering/sealing the container?

1.8 Record Keeping

_____ Does the plan describe how the records which identify the date, time, weight/volume, waste/material, trucking company, driver, and vehicle used for each trip will be gathered?

_____ Does the plan discuss how such records will be maintained?

_____ Does the plan describe the record keeping training or instruction that will be provided to site personnel and vehicle operators?

_____ Does the plan identify all transportation documents, specifically those required by law, to be carried with the load? Note: the location of these documents should be specified. Such documents may include: bill of lading identifying the shipment; analytical results representing the load; hazardous waste manifest; maps and complete instructions describing the route to be traveled; and special instructions including

emergency procedures and contacts for the transporter.

1.9 Health and Safety

_____ Does the plan describe health and safety procedures during loading as they apply to transportation personnel?

_____ Does the plan require that workers be properly trained in hazardous waste operations in accordance with 29 CFR 1910.120 and CCR Title 8 Section 5192 (if applicable)?

_____ Does the plan state the type of health and safety training to be provided to site personnel and vehicle operators?

_____ Does the plan describe the specific tasks assigned to personnel and those that are strictly prohibited?

_____ Does the plan discuss how the health and safety plan will be communicated to drivers and how the plan will be enforced?

_____ Does the plan describe notification procedures and contingency plans for accidents or breakdowns in route?

_____ Does the plan require each driver to carry a copy and be able to demonstrate an understanding of the contingency plan?

_____ Does the plan designate a transportation coordinator? Note: large scale projects often involve several independent trucking companies. In this case, it will be necessary to identify a transportation coordinator who is accessible 24 hours a day during hauling operations and who has the ability to communicate with and direct the activities of each driver on and off the site.

_____ Does the plan provide an organizational structure showing the chain of command for all trucking companies involved?

_____ Does the plan include an on-site contingency plan to be implemented in the event of an on-site release, employee exposure or injury? Note: the on-site contingency plan should be available to all personnel working at the site.

_____ Does the plan require the site safety officer to review the contingency plan with all contractors, subcontractors and their employees prior to commencing work on the site?

_____ Does the plan identify key personnel and their alternates who will be responsible for on-site safety and on-site response operations?

1.10 Contingency Plan

_____ Does the plan include a contingency plan for accidental off-site releases?

_____ Will the contingency plan be distributed to emergency service organizations, law enforcement agencies and transportation authorities that have jurisdiction along the proposed route? Note: notify all these organizations prior to commencement of any transportation activities.

_____ Does the contingency plan include contaminant descriptions, a hazard analysis, and possible methods for the containment and cleanup of an accidental release? Note: the contingency plan should contain sufficient information for the emergency service organizations to determine if evacuation is necessary.

_____ Does the plan require drivers to carry a copy of the contingency plan?

_____ Does the plan require that drivers be trained to implement the provisions of the contingency plan for which they are adequately trained and equipped?