Neumann University

HAZARDOUS WASTE MANAGEMENT PLAN

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Please direct any questions or comments about the applicability of this document to the Chemical Hygiene Officer (CHO, Dr. Matt Mastropaolo, Ph.D. Bachmann 349).

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HAZARDOUS WASTE MANAGEMENT PLAN

1.0 Purpose

Neumann University is committed to operating its campus in the safest manner possible. Neumann University pays particular attention to protecting the environment and its campus community in accordance with all Federal and State statutes. The Hazardous Waste Management Plan, as outlined in the following sections, has been prepared to comply with applicable regulations promulgated by the United States Environmental Protection Agency (EPA), the Pennsylvania Department of Environmental Protection (PA DEP), and the local ordinances enacted at Aston, Pennsylvania.

2.0 Scopes and Application

This Hazardous Waste Management Program establishes the requirements to ensure that Neumann University's hazardous wastes (HW) are properly managed. This program describes the requirements relating to the identification, management, labeling, disposal, and manifesting of hazardous waste. This plan also presents guidelines for the legal disposal of non-restricted materials to the sanitary sewer, the air, and the regular trash. It also outlines applicable emergency procedures, prevention, response requirements, training, and record keeping requirements.

Neumann University is currently registered as a Small Quantity Generator (SQG) under both the EPA and the PA DEP requirements[1]. As such, the institution as a whole is allowed to generate (per month):

- Between 220 pounds (100 kg) and 2200 pounds (1,000 kg) of non-acutely hazardous waste (D, F, K, or U waste codes)
- No more than 2.2 pounds (1 kg) of acutely hazardous waste (P waste codes)
- No more than 220 pounds (100 kg) of acutely hazardous waste spill clean-up materials

All waste generated is managed and disposed of under the EPA ID number PAR000027177. As a SQG, Neumann may accumulate hazardous waste on-site for a maximum time of 180 days.

The guidance that follows applies to all research, teaching, and support functions within Neumann University that either generate hazardous waste as a product of its function; or dispose of excess, old or unknown hazardous chemicals found within the facilities owned or used by the University.

Compliant hazardous waste management is achieved through awareness of the regulatory requirements, frequent training for faculty, staff, and students, and the use of best business practices. Each laboratory instructor or shop manager is responsible for ensuring that appropriate HW management practices are followed on a daily basis. Problems, issues, or concerns with the management of hazardous wastes must be communicated to the Neumann University Chemical Hygiene Officer in a timely manner.

[1] Title 25, Chapter 262a of the Pennsylvania Code incorporates, by reference, US EPA 40 CFR Part 262.

3.0 Authority

Title 25 of the Pennsylvania Code
Title 40 Code of Federal Regulations
Title 49 Code of Federal Regulations §107.601-620)

4.0 General Procedures

Managers and Principal Investigators for Neumann University's laboratories, classrooms, and chemical use areas shall make every effort to maintain compliance with SQG standards. Any supervisor responsible for the management of a laboratory or work area that generates-hazardous waste must establish a Satellite Accumulation Area (SAA) for the collection and proper management of hazardous wastes, conduct a written waste determination and characterization, and conform to the requirements stipulated by the Pennsylvania Department of Environmental Protection (PA DEP) for Small Quantity Generators (SQGs). To ensure compliance, each generator must also notify the Chemical Hygiene Officer (CHO) of the types of hazardous wastes generated.

The University will remove all HW containers stored within the Central Accumulation Area (CSA) within the required 180-day period using a licensed hazardous waste contractor. All HW will be managed according to local, state, and federal law and every effort will be made to reduce the potential long-term financial and legal liability to the institution. Furthermore, as an institution, Neumann University will make every effort to reduce the quantity and toxicity of the hazardous waste it generates through chemical reuse, material substitution, process modification, or other pollution prevention activities where possible.

5.0 Requirements within the Laboratory, Classroom, and Chemical Use Area

5.1 Waste Determinations

Under the Resource Conservation and Recovery Act (RCRA, pronounced rick-rah), all hazardous materials destined for disposal must be considered hazardous wastes unless determined otherwise. Only individuals who are properly trained in the regulatory definitions of hazardous wastes may make waste determinations. When knowledge of the hazard characteristics cannot be determined, or are unknown, waste analysis is required to be completed. Once a waste determination is made, the waste is managed appropriately as a hazardous waste or discarded as a non-hazardous waste. All waste determinations must be maintained in writing and on file for a minimum of three (3) years.

In order to conduct a waste determination all potentially hazardous constituents and reaction products must be considered. When in doubt, disposing of a non-regulated, hazardous material as a hazardous waste is preferable to possibly releasing a potentially toxic pollutant to the environment. To properly manage hazardous waste storage areas, laboratories, shops, and all other chemical use areas, the individuals responsible for the areas must identify and inventory their waste streams; characterize these wastes; and submit this information to the Chemical Hygiene

Officer. The Chemical Hygiene Office will determine and track the University's waste generator status. This procedure is conducted by addressing the following steps:

- **Identify and inventory waste –** All waste streams must be identified with the generator's knowledge of the experimental process, which will determine whether the wastes generated are hazardous under RCRA. Examples include science lab experiment–week one (*etc.*), scheduled warehouse clean out, art project–one (*etc.*), or building renovation. These processes may yield, respectively, excess hazardous reagents, out-dated chemicals, spent paint solvents, or asbestos-containing materials. Once these waste streams have been identified, the generator must determine the approximate volume or quantity of wastes that will be generated each month.
- **Characterize the waste –** Determine whether the waste is a RCRA characteristic waste (D), a process waste (F, K), or a listed waste (U, P), and is not exempt or excluded under RCRA rules. (See Appendix A.)

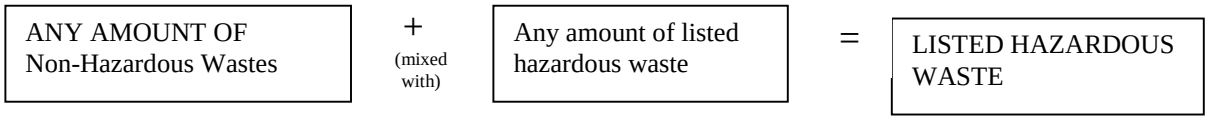
  Hazardous waste includes chemicals and solutions with the following characteristics:

  - All heavy metals and their salts (toxic);
  - All sulfides, bisulfides, and cyanides (reactive);
  - All other toxic, reactive or oxidizing inorganics (toxic, reactive, or corrosive);
  - All organic compounds *except ethanol below 24%* (toxic, ignitable, or corrosive);
  - All gases not normally constituents of the earth's atmosphere, and all flammable or oxidizing gases (toxic, reactive, ignitable, or corrosive)
- **Determine if a mixed chemical waste is hazardous or non-hazardous -** If a RCRA-listed hazardous waste is mixed with a non-hazardous waste then the resulting mixture will remain regulated as the listed waste regardless of quantity present in the mixture. (See Figure 1 below.)

  If a characteristic hazardous waste is mixed with a non-hazardous waste, then the resulting mixture will be regulated as hazardous only if the resulting mixture still exhibits the hazardous characteristic.
- **Determine and track generator status** – Maintain a log of the hazardous waste generation process. Information that should be included on this log include the following:

  - **<u>For each waste</u>**: Description of the waste (e.g., waste solvents from labs); type of waste (hazardous waste or acutely hazardous waste); method of characterization (e.g., lab exercise date, generator knowledge); amount generated in the month; and amount accumulated in the month.
  - **<u>Totals</u>:** Amount of all hazardous waste generated in the month; amount of all acutely hazardous wastes generated in the month; and the amount of all hazardous waste accumulated in the month.

Figure 1



5.2 Unknown, Discarded, and Unneeded Chemicals

Unidentified substances present a major problem for both storage and disposal. These chemicals can be removed by a hazardous waste transporter, but their disposal is much more expensive than disposing of known hazardous materials. Therefore, proper labeling and identification is important. "Unidentified or Unlabeled Chemicals" are those containers without a label, containers labeled with only codes, generic process labels that do not specifically list the chemicals contained, and mislabeled chemicals. Each of these chemicals must be "fingerprinted" (through chemical analysis) for specific hazard classes before they may be removed from the premises by a licensed hazardous waste transporter.

Peroxide forming compounds, such as ethers (ethyl ether, and dioxane, but not "pet ether" or dioxins etc.), absorb and react with oxygen to form potentially explosive compounds over time (See Appendix B). Exposure to air and light accelerates these formations. Therefore, if your unlabeled liquid is partially or fully evaporated, and if crystals are present (or the liquid has become cloudy), label the container as "Possible Peroxide" and handle these containers as little as possible. These chemicals must be brought to the attention of the hazardous waste transporter before any pickup is made.

Chemicals such as Picric Acid can become unstable if allowed to dehydrate. Due to the potential for friction or shock-sensitive explosion with these chemicals, do not move or attempt to open these bottles if the container appears old, crystalline, or damaged in any way. Alkali metals are air reactive and must be completely immersed in kerosene. If the kerosene has volatilized exposing these reactive metals to air, then dangerous concentrations of hydrogen can be produced, and/or a metal peroxide crust may accumulate. These chemicals must be brought to the attention of the hazardous waste transporter before any pickup is made.

Unused and unneeded chemicals often generate unnecessary waste and contribute to historic chemical mismanagement. Removal of unwanted chemicals and a continual evaluation of stored chemical containers is necessary to maintain safe operating chemical storage areas. To properly manage reagent chemicals on the Neumann campus, the laboratory instructor or manager shall:

- Conduct a thorough laboratory cleanup and properly dispose of all unknowns, unwanted and unneeded chemicals.
- Follow storage and labeling practices described in a Chemical Hygiene Plan to ensure that unknowns are not generated in the future.
- Keep storage of chemicals to a minimum and review the annual inventory for unneeded chemicals.
- Limit waste by offering unwanted chemicals (that are still in good condition and not expired) to other labs on campus.
- Borrow and share small amounts of rarely used chemicals with neighboring laboratories.
- Order the minimum practicable quantity of a chemical when purchasing.

5.3 Containers, Compatibility, and Storage

Waste chemicals must be stored in containers that are chemically compatible with the contents. Incompatible wastes must not be mixed together, nor can they be placed in an un-rinsed container that contained an incompatible material. Acids cannot be mixed with bases and flammables

cannot be mixed with oxidizing chemicals. Similarly, corrosives cannot be placed in metal containers, and Hydrofluoric Acid cannot be placed in glass containers.

Waste containers must be kept tightly closed at all times unless wastes are actively being added. Waste containers must be stored in such a way that they will not rupture or leak due to temperature, exposure to corrosive vapors, etc. All containers must be labeled appropriately and with labels visible according to the guidelines in Section 5.4.

All wastes must be stored indoors, on a firm-working surface, and in secondary containment which will prevent the migration of released or spilled hazardous waste into the environment. Containers shall be stored in a manner such that in the event of a release, the contents will not enter the sanitary sewer or storm water drains. All wastes must be placed in Department of Transportation (DOT) approved shipping containers before shipment off site.

5.4 Marking and Labeling Requirements

5.4.1 Containers

Each hazardous waste container must be properly marked or labeled. The marking or label must include the following information:

- The words "Hazardous Waste"
- List of chemicals contained within the container and approximate percentages
- Hazard characteristics of the waste (e.g.: "flammable," "combustible," "corrosive," "reactive," "oxidizer," "organic peroxide," and "carcinogen")
- The hazardous waste accumulation start date for that container

Preprinted labels are available from commercial vendors, although a laboratory-generated label is perfectly acceptable (See Appendix C). Fill in all applicable information, being sure to include all hazardous chemical constituents and the approximate concentration of each. Accumulation dates are added after the container is full and prior to timely transfer to the Central Accumulation Area.

5.5 Satellite Accumulation Areas

Each SAA must be labeled appropriately and located at, or near the point of generation and under the control of the laboratory manager or person directly responsible for the process generating the waste. SAAs may not contain accumulated hazardous wastes that are combined from several laboratory areas. Hazardous wastes may not be transported from one laboratory to another in a common hallway, in an elevator, or in a stairwell, by untrained or unauthorized personnel.

Containers within a SAA must be stored by compatibility, and on an impervious surface within secondary containment, to prevent spilled waste from entering the sanitary sewer. Each SAA cannot store more than 55 gallons of hazardous wastes or one quart of an acutely hazardous wastes at one time. Also, hazardous waste containers cannot be stored within an SAA for longer than one year past its accumulation start date. When a hazardous waste container is full, the "full date" must be labeled on the container and be taken to the 180-day "Central Storage Area" (CSA) within 72 hours. Notify the Chemical Hygiene Officer of any full or year old containers that need to be transferred to a CSA.

5.6 Accumulation Limits

Maximum Amount of Waste Stored in Satellite Accumulation Area	Allowable Amount of Waste Generated on Campus in Calendar Month	Amount of Waste Stored in Central Hazardous Waste Storage Area
• 55 gallons of non-acute hazardous waste • 1 quart of acutely hazardous waste • Remove from the SAA within 72 hours of filling the container • Must be removed from the SAA for disposal within one year	As a Small Quantity Generator, one or more of the following amounts are generated on campus: • Between 220 pounds (100 kg) and 2200 pounds (1000 kg) of hazardous waste • <2.2 pounds (1 kg) of any one acutely hazardous waste • <220 pounds (100 kg) of acutely hazardous waste spill cleanup • <22 pounds (10kg) of acutely hazardous waste from inner liners or paper bags	• Limit of 6000 kg (13,200 pounds) • Waste must be shipped off-site within 180-days of the "fill date" which was the start date when marked "full" at the SAA

A waste container must be removed from the CSA within 180 days of the accumulation start date for all hazardous wastes.

5.7 Legal Disposal to the Sewer System

The majority of chemical substances will be disposed of by transferring them to a company licensed to operate a treatment, storage, disposal facility (TSDF). Chemical substances cannot be flushed down the drain without issuance of a wastewater discharge permit. Chemical wastes cannot be dumped in storm water catch basins or floor drains.

5.7.1 Acids and Bases

Provided that a material is not hazardous for any other reason than corrosivity (e.g. organic acids are both corrosive and ignitable), acidic or basic laboratory waste may be neutralized, as long as the steps of neutralization are part of the specific written experiment that created the material. The resulting neutral (pH 6.0-9.0) salt solution may be flushed down the drain.

This neutralization process can only take place at the point of generation. It cannot be conducted in an accumulation container (such as a flask, beaker or chemical bottle). This step must be a part of the written, experimental procedure and is typically performed by students as part of an experiment and not by the instructor.

5.7.2 Inorganic Compounds

Inorganic compounds that are not hazardous waste may be dissolved in water and flushed down the drain with copious amounts of cold water. This can occur provided the inorganic compounds do not contain heavy metals or toxic anions, and the compounds are not oxidizers or water reactive. In particular, the following chemicals may be flushed to the sanitary sewer:

- Soluble, non-water reactive salts of sodium, potassium, magnesium, and calcium
- Soluble, non-water reactive chlorides, bromides, carbonates, bicarbonates, sulfates, and nitrates

5.7.3 Chemicals Prohibited from Sink Discharges

Chemicals, which may not be flushed into the sewer system include, but are not limited to:

- Arsenic, barium, copper, tin, lead, silver, iron, cobalt, nickel, cadmium, chromium, zinc, manganese, selenium, and mercury salts
- Fluorides, sulfides, bisulfides, cyanides, nitrites, peroxides, chlorates, perchlorates, and permanganates

5.8 Illegal Treatment or Disposal

The treatment of hazardous waste is illegal without a permit issued from the Pennsylvania Department of Environmental Protection (DEP). Exception to this would be the neutralization process noted in Section 5.7, certain emergency response cleanup techniques, and/or the treatment of hazardous waste within totally enclosed treatment units. Adding additional steps to the end of an experiment for the sole purpose of reducing the volume or toxicity of a hazardous waste is interpreted as treatment and is illegal under hazardous waste rules.

Once a chemical is no longer useful, or being retained for its intended use, a waste determination must be conducted. Because of the complexity of the regulations, waste determination questions should be directed to trained personnel.

5.9 Training for Faculty and Staff

All Neumann faculty and staff who generate or handle hazardous wastes will be trained in this Hazardous Waste Management Plan. A refresher of the initial training shall be performed on an annual basis. Training given as part of the curriculum will satisfy this requirement.

Written documentation of each training session, including a signature and date of the person trained, will be maintained for a minimum of three (3) years.

5.10 Laboratory renovations, modifications and academic restructuring

From time to time, the use of a particular laboratory at Neumann is modified to meet the needs of new faculty members, an expanding department, or an academic curriculum. Similarly, as emeritus faculty members leave the University, their research spaces are reallocated to new department members. Invariably, chemicals and equipment are left behind, or are no longer needed and must be addressed. Before renovations can commence, the laboratory will be thoroughly inspected for excess chemicals and hazardous waste. Any unwanted chemicals and

hazardous waste must be removed from the area. All surfaces should be neutralized and cleaned with a soap and water solution. These decontamination materials should also be disposed of properly. The laboratory must be reassigned to the new faculty member in the best possible condition. This process is the responsibility of each Department Chair.

6.0 Storage Area and Campus-wide Hazardous Waste Management Requirements

6.1 Storage Facility/Area Requirements

All hazardous waste and unneeded hazardous material containers shall be stored on an impervious surface. Indoor storage areas must be provided with secondary containment that can contain 10% of the total volume in storage or 100% of the largest container, whichever is greater.

Each CSA shall be clearly marked with the words, "Hazardous Waste Central Storage Area" and maintained separate from all other areas. Access to the hazardous waste storage area is restricted to authorized personnel only.

Each container or drum located in the CSA shall be marked or labeled with the words "Hazardous Waste" and information (accumulation start date and contents) in accordance with Section 5.4.

Smoking and open flames are not permitted near any hazardous waste storage area. "No Smoking" signs must be posted around the working area. All potential sources of ignition or reaction will be removed or addressed before work with ignitable or reactive wastes commences. Grounding and bonding connections will be used when transferring flammable liquids from one container to another.

6.2 Disposal and Manifesting

6.2.1 Disposal of Hazardous Wastes

Neumann University is a Small Quantity Generator (SQG); and therefore must comply to the SQG regulations. Hazardous waste removal must be conducted before the end of each 180-day accumulation period. Removal and disposal of hazardous waste must be performed by a licensed HW transporter. To control costs associated with the disposal of hazardous waste, Neumann will seek to maintain a long-term service contract with an approved hazardous waste vendor. Decisions regarding the vendor choice will not be based solely on price, but will take into account the institution's long-term liability. Where possible, Neumann will allow licensed contractors to recycle hazardous wastes and materials (i.e., Mercury), allow for fuel blending opportunities, or allow elementary neutralization of simple corrosives (i.e., acids and bases) where no other hazard exists. All other hazardous wastes will be transported to a licensed hazardous waste facility for recycling, incineration, or chemical treatment before landfill disposal. At no time will hazardous wastes generated on the Neumann campus be shipped to foreign countries for disposal.

6.2.2 Facility Personnel Training

There shall be at least two employees of Neumann University who receive DOT Hazardous Materials training, in addition to hazardous waste training, to ensure that Hazardous Waste manifests are completed properly. Only those individuals who have been properly trained are to

sign hazardous waste manifests on behalf of the University. This training must be re-taken every three years.

Copies of the training content and training certificates will be retained for at least a period of three (3) years.

6.2.3 SQG Waste Handler Training

The EPA and Pennsylvania DEP require that persons handling waste at SQG sites be trained to ensure that they are thoroughly familiar with proper handling and emergency response procedures relevant to their responsibilities.

Responsibilities should include all of the following:

- Hazardous Waste Determinations
- Containers, Compatibility, Handling and Storage
- Container Inspections
- Accumulation Limits
- Labeling Requirements
- Disposal and Manifesting
- Spill Response Procedures

Training should be conducted at the time of initial assignment to duties, which require handling waste, or when chemicals that are PA DEP and EPA regulated wastes are added to a process or work area.

6.2.4 Shipping Manifests

Neumann University representatives shall ensure that the EPA required "Uniform Hazardous Waste Manifest" (EPA Forms 8700–22 and 8700–22A) is properly completed. EPA recently revised the Uniform Hazardous Waste Manifest (PDF) (1 pg, 93K) used to track hazardous waste from a generator's site to the site of its disposition. **Starting September 5, 2006, the new Uniform Hazardous Waste Manifest must be used for all hazardous waste shipments.**

If Neumann University has not received a signed copy from the receiving facility within 35 days of shipment, they are to contact the receiving facility to reconcile the disposition of the shipment. If the signed copy has not been received with 45 days of shipment, then an Exception Report must be submitted by Neumann University, to the Pennsylvania DEP and EPA.

The hazardous waste transporter shall provide Neumann University with the EPA required two-part manifest for wastes that are reclaimed or recycled according to the contractual agreement. All copies received by Neumann University from the hazardous waste transporter will be maintained together in the Chemical Hygiene Officer's records.

Compliance with the new regulations is relatively straightforward. In Pennsylvania only the Treatment, Storage or Disposal Facility must submit a signed manifest copy to the PA DEP. The PA DEP also wishes to receive a signed manifest copy (copy 2) from facilities located outside of Pennsylvania which receive hazardous waste from Pennsylvania generators. These copies should be mailed to:

PA DEP
Manifest Section
P O Box 8550
Harrisburg, PA 17105-8550

The generator of the hazardous waste does not have to submit a generator copy to the Commonwealth of Pennsylvania. In addition, Pennsylvania does not require any additional wastes other than RCRA hazardous waste to be shipped using a Uniform Hazardous Waste Manifest.

A number of states have additional state requirements regarding the use of the new Uniform Hazardous Waste Manifest. Some states require copies to be submitted to the State, and/or have State-specific waste codes in addition to the federal hazardous waste codes required to be entered on the new manifest.

Manifests and accompanying documents must be retained for at least three years. Documents older than three years should be archived separately from the current files.

7.0 Hazardous Materials Registration Fees

On May 1, 2000, the Department of Transportation (DOT) expanded its hazardous materials registration program (see 49 CFR Part 107, Subpart G) to include those who offer or carry a shipment of hazardous materials (including hazardous wastes) that require placards. As a result, shippers of non-bulk packages became subject to the DOT's hazardous materials registration fee. All colleges and universities shipping hazardous waste through a commercial transporter are now responsible for registering annually and submitting a fee of $2,000. The fee is $250 if the institution is classified as a small business. Documentation of registration and payment is received in the form of a Hazardous Materials Registration Certificate.

Since 1992, DOT's Research and Special Programs Administration (RSPA)[2] has used the fees from this registration program to fund the Hazardous Materials Emergency Preparedness (HMEP) grant program that supports hazardous materials emergency response planning and training activities by State and local governments. The registration program also allows the RSPA to gather information on hazardous materials movements throughout the US.

Collection of fees from the expanded pool of registrants rose to $21 million annually. This resulted in a surplus of HMEP Funds, because Congress limited the annual grants program to $14.3 million. In 2003, RSPA temporarily lowered the registration fee for the next six registration years.

[2] In February 2005 the offices within the U.S. Department of Transportation's Research and Special Programs Administration (RSPA) responsible for the safe transportation of hazardous materials were incorporated into the newly created Pipeline and Hazardous Materials Safety Administration (PHMSA). Hazardous Materials Certificates of Registration are now issued by PHMSA. Certificates issued by RSPA remain valid through their expiration date.

A registration year extends from July 1 of a year through June 30 of the following year. RSPA also set the fees for not-for-profit organizations, regardless of size, to the fee paid by small businesses. For the first three registration years, the fee for small businesses has been set at $150. For the last three registration years the fee has been set at $275. The six registration years run from 2003-2004 through 2008-2009.

Companies subject to these regulations must submit a complete and accurate registration statement on DOT Form F 5800.2 no later than June 30 for each registration year. A copy of the form for the 2005-2006 registration years is included in Appendix D. For a copy of the most current year's instruction brochure and registration form, go to the "Hazmat Registration" Internet site at http://hazmat.dot.gov/regs/register/register.htm. Fees are paid in advance of the registration year. Schools must register for prior years if (1) they engaged in activities that required registration during those years, and (2) they failed to register. The amount of the fees due for prior years is indicated above. A schedule of these fees is also attached in Appendix D.

Each of the registration fees given above includes a $25 processing fee. An institution may register for up to three years at one time, but pays only one processing fee. Go to the "Hazmat Registration" site for additional information on the following:

- Instructions for registering online
- A complete list of the current U.S. Small Business Administration size standards
- Company Registration Look-Up
- HMEP Grants Program Information

8.0 Emergency Response Equipment and Procedures

All faculty and staff are required to be trained in appropriate emergency procedures under both PA DEP and Occupational Safety and Health Administration (OSHA) regulations. Emergency evacuation plans, fire extinguishers, spill control equipment and how to use the equipment as part of responsible waste management.

Emergency phone numbers, including the number of the local fire department and the Emergency Response Coordinator shall be posted near each telephone. The locations of fire extinguishers, alarm systems (if present), and spill control equipment should also be posted and clearly marked.

Each SQG site must have an Emergency Response Coordinator (ERC) capable of responding to emergencies within a short time period. The ERC is designated as Leon Francis, Director of Campus Safety. The ERC must call the fire department in the event of a significant fire, ensure that the flow of hazardous materials is contained in the event of a release, and ensure that any contaminated materials or soils are removed. All ERCs are required to respond to an emergency and interface with external emergency response agencies; therefore, the ERC must be trained in Incident Command procedures.

Specific Emergency Response Procedures are located in the Neumann University Emergency Response Plan.