



Emergency Action Plan



Emergency Response Plan



Emergency

- ★ "A workplace emergency is an unforeseen situation that threatens your employees, customers, or the public; disrupts or shuts down your operations; or causes physical or environmental damage"
 - "How to Plan for Workplace Emergencies & Evacuations," U.S. Dep't of Labor, Occupational Safety & Health Administration, Publication OSHA 3088/Revised 2001

Examples

- ★ Floods
- ★ Hurricanes
- ★ Tornadoes
- ★ Fires
- ★ Blizzards
- ★ Toxic gas releases
- ★ Chemical spills
- ★ Radiological accidents/RDD
- ★ Explosions
- ★ Civil disturbances
- ★ Workplace violence

Why Pre-plan for Emergencies?

Legal Requirements

- ★ SARA Title III/EPCRA (40 CFR 355)
- ★ RCRA (40 CFR 265.50)
- ★ HAZWOPER (1910.120)
- ★ Hazcom (1910.1200)
- ★ OSHA EAP (1910.38)
- ★ Fire Extinguishers (1910.157)
- ★ Fixed Extinguishing Systems (1910.160)

Legal Requirements

- ★ Fire Detection Systems (1910.164)
- ★ Alarm Systems (1910.165)
- ★ Fire Protection (Subpart L, Appendix A)
- ★ Local/state requirements

Business Reasons

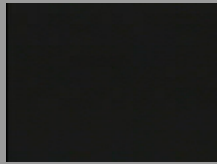
- ★ More coordinated, timely response
- ★ Minimize effects of adverse exposure to employees
- ★ Minimize liability
- ★ Bottom line is \$\$\$

Industry Advantages

- ★ You know (or should know!) exactly what you have
- ★ You know where chemicals are stored & used
- ★ You know your processes & plant layout
- ★ You know your products & wastes
- ★ You know how wastes are disposed of

Fire departments have no such advantages; they can really only plan for generalities





Components Of Pre-planning

- ★ In many cases you don't necessarily need separate plans for different regulatory requirements
- ★ Consolidate where possible!



Different Names Depending On Regulation Or Standard

- ★ Emergency Action/Evacuation Plan
- ★ Emergency Response Plan
- ★ Contingency Plan
- ★ Site Safety Plan
- ★ Training Plan
- ★ Incident Action Plan
- ★ This Plan, That Plan, Everybody Wants a Plan Plan

Each Type Of Action Different, But Similar Req'ts

- ★ Nature of site emergencies
- ★ Types of emergencies
- ★ Procedures for dealing with emergencies

EAP Components

- ★ Procedures for **reporting** fire or other emergency
- ★ Procedures for emergency **evacuation**, including type of evacuation & exit route assignments
- ★ Procedures to be followed by employees who **remain** to operate critical plant operations before they evacuate

EAP Components

- ★ Procedures to **account** for all employees after evacuation
- ★ Procedures to be followed by employees performing **rescue or medical** duties
- ★ Name or job title of every employee who may be **contacted** by employees who need more information about plan or explanation of duties under plan

EAP Components

- ★ Outs/exemptions:
 - Very few (fire brigade & extinguishers)
 - Can be orally-communicated (≤10 employees)
 - ◆ Still have burden-of-proof of plan's viability
- ★ OSHA E-tool
 - www.osha.gov/SLTC/etools/evacuation/index.html

ERP Components

- ★ Defined “Emergency” earlier
- ★ Emergency response
 - Response effort by employees from **outside immediate release area** or by **other designated responders** (i.e., mutual aid groups, local fire departments, etc.) to occurrence which results, or likely to result, in uncontrolled release of a hazardous substance

Emergency Response Plan

- ★ Pre-emergency planning & coordination
- ★ Personnel roles, lines of authority, training & communication
- ★ Emergency recognition & prevention
- ★ Safe distances & places of refuge
- ★ Site security & control
- ★ Evacuation routes & procedures

Emergency Response Plan

- ★ Decontamination
- ★ Emergency medical treatment & first aid
- ★ Emergency alerting & response procedures
- ★ Critique of response & follow-up
- ★ PPE & emergency equipment

What is Called For?



What is Called For?



Contingency Plan

- ★ Roles of response personnel
- ★ Incident Command System (Incident Management System)
- ★ Training
- ★ Communications & alert notification systems
- ★ Site mapping
- ★ Site security & control
- ★ Places of safe refuge

Contingency Plan (cont'd)

- ★ Evacuation routes
- ★ Decontamination
- ★ Medical program
- ★ Emergency response procedures
- ★ Documentation
- ★ Reporting procedures

The "One-Plan"

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- ★ Also known as Integrated Contingency Plan (ICP)
- ★ Allows facility to comply with multiple federal planning requirements by consolidating into one functional emergency response plan

One-Plan Signatories

- ★ EPA
- ★ OSHA
- ★ Coast Guard
- ★ DOI/Minerals Management Service
- ★ DOT/RSPA

ICP Elements

- ★ EPA RCRA
 - 40 CFR 264, Subpart D
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 - 40 CFR 79.52
- ★ EPA Oil Pollution Prevention
 - 40 CFR 112
- ★ Coast Guard FRP
 - 33 CFR 154



ICP Elements

- ★ DOT RSPA/FRP
 - 49 CFR 194
- ★ OSHA EAP
 - 29 CFR 1910.38(a)
- ★ OSHA PSM
 - 29 CFR 1910.119



ICP Elements

- ★ OSHA HAZWOPER
 - 29 CFR 1910.120
- ★ EPA CAA RMP
 - 40 CFR 68
- ★ MMS Facility Response Plan
 - 30 CFR part 254



How to Get It

- ★ www.epa.gov/region1/enforcement/epcra/neplan.html