OSHA: GUIDELINES FOR EMERGENCY PREPAREDNESS AND RESPONSE

1.0 INTRODUCTION

The importance of an effective workplace safety and health program cannot be overemphasized. There are many benefits from such a program including increased productivity, improved employee morale, reduced absenteeism and illness, and reduced workers' compensation rates; however, incidents still occur in spite of efforts to prevent them. Therefore, proper planning for emergencies is necessary to minimize employee injury and property damage.

2.0 PURPOSE

This discussion details the basic steps to handle emergencies in the workplace. These emergencies include accidental releases of toxic gases, chemical spills, fires, explosions, and bodily harm and trauma caused by workplace violence. This discussion is intended to assist small businesses that do not have safety and health professionals. It is not intended as an all-inclusive safety program but rather to provide guidelines for planning for emergencies.

3.0 PLANNING

The effectiveness of response during emergencies depends on the amount of planning and training performed. Management must show its support for plant safety programs and the importance of emergency planning. If management is not interested in employee protection and in minimizing property loss, little can be done to promote a safe workplace. It is therefore management's responsibility to see that a program is instituted and that it is frequently reviewed and updated.

The input and support of all employees must be obtained to ensure an effective program. The emergency response plan should be developed locally and should be comprehensive enough to deal with all types of emergencies specific to that site. When emergency action plans are required by a particular OSHA standard, the plan must be in writing; except for firms with 10 or fewer employees, the plan may be communicated orally to employees. The plan must include, as a minimum, the following elements:

1. Emergency escape procedures and emergency escape route assignments,
2. Procedures to be followed by employees who remain to perform (or shut down) critical plant operations before the plant is evacuated,
3. Procedures to account for all employees after emergency evacuation has been completed,
4. Rescue and medical duties for those employees who are to perform them,
5. The preferred means for reporting fires and other emergencies, and
6. Names or regular job titles of persons or departments to be contacted for further information or explanation of duties under the plan.

The emergency action plan should address all potential emergencies that can be expected in the workplace. Therefore, it will be necessary to perform a hazard assessment to determine toxic materials in the workplace, hazards, and potentially dangerous conditions. For information on chemicals, the manufacturer or supplier can be contacted to obtain Material Safety Data Sheets. These forms describe the hazards that a chemical may present, list precautions to take when handling, storing, or using the substance, and outline emergency and first-aid procedures.

The employer must list in detail the procedures to be taken by those employees who must remain behind to care for essential plant operations until their evacuation becomes absolutely necessary. This may include monitoring plant power supplies, water supplies, and other essential services that cannot be shut down for every emergency alarm, and use of fire extinguishers.

For emergency evacuation, the use of floor plans or workplace maps that clearly show the emergency escape routes and safe or refuge areas should be included in the plan. All employees must be told what actions they are to take in emergency situations that may occur in the workplace, such as a designated meeting location after evacuation.

This plan must be reviewed with employees initially when the plan is developed, whenever the employees' responsibilities under the plan change, and whenever the plan is changed. A copy should be kept where employees can refer to it at convenient times. In fact, to go a step further, the employer could provide the employees with a copy of the plan, particularly all new employees.

4.0 CHAIN OF COMMAND

A chain of command should be established to minimize confusion so that employees will have no doubt about who has authority for making decisions. Responsible individuals should be selected to coordinate the work of the emergency response team. In larger organizations, there may be a plant coordinator in charge of plant-wide operations, public relations, and ensuring that outside aid is called in. Because of the importance of these functions, adequate backup must be arranged so that trained personnel are always available. The duties of the Emergency Response Team Coordinator should include the following:

1. Asssessing the situation and determining whether an emergency exists that requires activating the emergency procedures,
2. Directing all efforts in the area including evacuating personnel,
3. Ensuring that outside emergency services such as medical aid and local fire departments are called in when necessary, and
4. Directing the shutdown of plant operations when necessary.

5.0 COMMUNICATIONS

During a major emergency involving a fire or explosion it may be necessary to evacuate offices in addition to manufacturing areas. Also, normal services, such as electricity, water, and telephones, may be nonexistent. Under these conditions, it may be necessary to have an alternate area to which employees can report or that can act as a focal point for incoming and outgoing calls. Since time is an essential element for adequate response, the person designated as being in charge should make this the alternate headquarters so that he/she can be easily reached.

Emergency communications equipment such as amateur radio systems, public address systems, or portable radio units should be present for notifying employees of the emergency and for contacting local authorities, such as law enforcement officials, private sector charitable groups, and the fire department.

A method of communication also is needed to alert employees to the evacuation or to take other action as required in the plan. Alarms must be audible or seen by all people in the plant and have an auxiliary power supply in the event electricity is affected. The alarm must be distinctive and recognizable as a signal to evacuate the work area or perform actions designated under the emergency action plan.

The employer must explain to each employee the means for reporting emergencies, such as manual pull box alarms, public address systems, or telephones. Emergency phone numbers should be posted on or near telephones, on employees' notice boards, or in other conspicuous locations. The warning plan should be in writing and management must be sure each employee knows what it means and what action is to be taken. It may be necessary to notify other key personnel such as the plant manager or physician during off-duty hours. An updated written list of key personnel should be kept listed in order of priority.

6.0 ACCOUNTING FOR PERSONNEL

Management will need to know when all personnel have been accounted for. This can be difficult during shift changes or if contractors are on site. A responsible person in the control centre must be appointed to account for personnel and to inform police or Emergency Response Team members of those persons believed missing.

7.0 EMERGENCY RESPONSE TEAMS

Emergency Response Teams are the first line of defence in emergencies.
Before assigning personnel to these teams, the employer must assure that employees are physically capable of performing the duties that may be assigned to them. Depending on the size of the plant there may be one or several teams trained in the following areas:

1. Use of various types of fire extinguishers,
2. First aid, including cardiopulmonary resuscitation (CPR),
3. Shutdown procedures,
4. Evacuation procedures,
5. Chemical spill control procedures,
6. Use of self-contained breathing apparatus (SCBA),
7. Search and emergency rescue procedures,
8. Incipient and advanced stage fire fighting, and
9. Trauma counselling.

The type and extent of the emergency will depend on the plant operations and the response will vary according to the type of process, the material handled, the number of employees, and the availability of outside resources. OSHA's Hazard Communication Standard (29 CFR part 1910.1200) is designed to ensure that the hazards of all chemicals produced or imported are evaluated and that information concerning their hazards is transmitted to employers and employees. This is done by means of comprehensive hazard communication programs including container labelling and other forms of warnings, material safety data sheets, and employee training.

Emergency Response Teams should be trained in the types of possible emergencies and the emergency actions to be performed. They are to be informed about special hazards - such as storage and use of flammable materials, toxic chemicals, radioactive sources, and water-reactive substances-to which they may be exposed during fire and other emergencies. It is important to determine when not to intervene. For example, team members must be able to determine if the fire is too large for them to handle or whether search and emergency rescue procedures should be performed. If there is the possibility of members of the Emergency Response Team receiving fatal or incapacitating injuries, they should wait for professional firefighters or emergency response groups.

8.0 TRAINING

Training is important to the effectiveness of an emergency plan. Before implementing an emergency action plan, a sufficient number of persons must be trained to assist in the safe and orderly evacuation of employees. Training for each type of disaster response is necessary so that employees know what actions are required. In addition to the specialized training for Emergency Response Team members, all employees should be trained in the following:

1. Evacuation plans,
2. Alarm systems,
3. Reporting procedures for personnel,
4. Shutdown procedures, and
5. Types of potential emergencies.

These training programs must be provided as follows:

1. Initially when the plan is developed,
2. For all new employees,
3. When new equipment, materials, or processes are introduced,
4. When procedures have been updated or revised,
5. When exercises show that employee performance must be improved, and
6. At least annually.

The emergency control procedures should be written in concise terms and be made available to all personnel. A drill should be held for all personnel, at random intervals at least annually, and an evaluation of performance made immediately by management and employees. When possible, drills should include groups supplying outside services such as fire and police departments. In buildings with several places of employment, the emergency plans should be coordinated with other companies and employees in the building. Finally, the emergency plan should be reviewed periodically and updated to maintain adequate response personnel and program efficiency.

9.0 PERSONAL PROTECTION

Effective personal protection is essential for any person who may be exposed to potentially hazardous substances. In emergency situations employees may be exposed to a wide variety of hazardous circumstances, including:

1. Chemical splashes or contact with toxic materials,
2. Falling objects and flying particles,
3. Unknown atmospheres that may contain toxic gases, vapours or mists, or inadequate oxygen to sustain life,
4. Fires and electrical hazards, and
5. Violence in the workplace.

It is extremely important that employees be adequately protected in these situations. Some of the safety equipment that may be used includes:

1. Safety glasses, goggles, or face shields for eye protection,
2. Hard hats and safety shoes for head and foot protection,
3. Proper respirators for breathing protection,
4. Whole body coverings chemical suits, gloves, hoods, and boots for body protection from chemicals, and
5. Body protection for abnormal environmental conditions such as extreme temperatures.

The equipment selected must meet the criteria contained in the OSHA standards or described by a nationally recognized standards producing
The choice of proper equipment is not a simple matter and consultation should be made with health and safety professionals before making any purchases. Manufacturers and distributors of health and safety products may be able to answer questions if they have enough information about the potential hazards involved. Professional consultation will most likely be needed in providing adequate respiratory protection. Respiratory protection is necessary for toxic atmospheres of dust, mists, gases, or vapours and for oxygen-deficient atmospheres. There are four basic categories of respirators:

1. Air-purifying devices (filters, gas masks, and chemical cartridges), which remove contaminants from the air but cannot be used in oxygen-deficient atmospheres.
2. Air-supplied respirators (hose masks, air line respirators), which should not be used in atmospheres that are immediately dangerous to life or health.
3. Positive-pressure self-contained breathing apparatus (SCBA), which are required for unknown atmospheres, oxygen-deficient atmospheres, or atmospheres immediately dangerous to life or health.
4. Escape masks.

Before assigning or using respiratory equipment the following conditions must be met:

1. A medical evaluation should be made to determine if the employees are physically able to use the respirator.
2. Written procedures must be prepared covering safe use and proper care of the equipment, and employees must be trained in these procedures and in the use and maintenance of respirators.
3. A fit test must be made to determine a proper match between the face piece of the respirator and the face of the wearer. This testing must be repeated periodically. Training must provide the employee an opportunity to handle the respirator, have it fitted properly, test its face piece-to-face seal, wear it in normal air for a familiarity period, and wear it in a test atmosphere.
4. A regular maintenance program must be instituted including cleaning, inspecting, and testing of all respiratory equipment. Respirators used for emergency response must be inspected after each use and at least monthly to assure that they are in satisfactory working condition. A written record of inspection must be maintained.
5. Distribution areas for equipment used in emergencies must be readily accessible to employees.

A positive-pressure self-contained breathing apparatus (SCBA) offers the best protection to employees involved in controlling emergency situations. It must have a minimum service life rating of at least 30 minutes. Conditions that require a positive-pressure SCBA include the following:

1. Leaking cylinders or containers, smoke from chemical fires, or chemical spills that indicate high potential for exposure to toxic substances.
2. Atmospheres with unknown contaminants or unknown contaminant concentrations, confined spaces that may contain toxic substances, or oxygen-deficient atmospheres.

Emergency situations may involve entering confined spaces to rescue employees who are overcome by toxic compounds or who lack oxygen. These permit-required confined spaces include tanks, vaults, pits, sewers, pipelines, and vessels.

Entry into permit-required confined spaces can expose the employee to a variety of hazards, including toxic gases, explosive atmospheres, oxygen deficiency, electrical hazards, and hazards created by mixers and impellers that have not been deactivated and locked out. Personnel must never enter a permit-required confined space unless the atmosphere has been tested for adequate oxygen, combustibility, and toxic substances. Conditions in a permit-required confined space must be considered immediately dangerous to life and health unless shown otherwise. If a permit-required confined space must be entered in an emergency, the following precautions must be adhered to:

1. All lines containing inert, toxic, flammable, or corrosive materials must be disconnected or blocked off before entry.
2. All impellers, agitators, or other moving equipment inside the vessel must be locked out.
3. Appropriate personal protective equipment must be worn by employees before entering the vessel. Mandatory use of harnesses must be stressed.

Rescue procedures must be specifically designed for each entry. A trained stand-by person must be present. This person should be assigned a fully charged, positive-pressure, self-contained breathing apparatus with a full face piece. The stand-by person must maintain unobstructed lifelines and communications to all workers within the permit-required confined space and be prepared to summon rescue personnel if necessary.

The stand-by person should not enter the confined space until adequate assistance is present. While awaiting rescue personnel, the stand-by person may make a rescue attempt utilizing lifelines from outside the permit-required confined space.

A more complete description of procedures to follow while working in confined spaces may be found in the OSHA standard for permit-required confined spaces, 29 CFR 1910.145 and the National Institute for Occupational Safety and Health (NIOSH) Publication Number 80-106, Criteria for a Recommended Standard...Working in Confined Spaces.

10.0 MEDICAL ASSISTANCE

In a major emergency, time is critical factor in minimizing injuries. Most small
businesses do not have a formal medical program, but they are required to have the following medical and first-aid services:

1. In the absence of an infirmary, clinic, or hospital in close proximity to the workplace that can be used for treatment of all injured employees, the employer must ensure that a person or persons are adequately trained to render first aid. The first aid is to begin within 3 to 4 minutes of the incident if the injury is of a serious nature.
2. Where the eyes or body of any employee may be exposed to injurious corrosive materials, eye washes or suitable equipment for quick drenching or flushing must be provided in the work area for immediate emergency use. Employees must be trained to use the equipment.
3. The employer must ensure the ready availability of medical personnel for advice and consultation on matters of employees' health. This does not mean that health care must be provided, but rather that, if health problems develop in the workplace, medical help will be available to resolve them.

To fulfill the above requirements, the following actions should be considered:

1. Survey the medical facilities near the place of business and make arrangements to handle routine and emergency cases. A written emergency medical procedure should then be prepared for handling accidents with minimum confusion.
2. If the business is located far from medical facilities, at least one and preferably more employees on each shift must be adequately trained to render first aid. The American Red Cross, some insurance carriers, local safety councils, fire departments, and others may be contacted for this training.
3. First-aid supplies should be provided for emergency use. This equipment should be ordered through consultation with a physician.
4. Emergency phone numbers should be posted in conspicuous places near or on telephones.
5. Sufficient ambulance service should be available to handle any emergency. This requires advance contact with ambulance services to ensure they become familiar with plant location, access routes, and hospital locations.

11.0 SECURITY

During an emergency, it is often necessary to secure the area to prevent unauthorized access and to protect vital records and equipment. An off-limits area must be established by cordoning off the area with ropes and signs. It may be necessary to notify local law enforcement personnel or to employ private security personnel to secure the area and prevent the entry of unauthorized personnel.

Certain records also may need to be protected, such as essential accounting files, legal documents, and lists of employees' relatives to be notified in case
of emergency. These records may be stored in duplicate outside the plant or in protected secure locations within the plant.

12.0 SOME OSHA REQUIREMENTS

The following is a list of some of the OSHA requirements pertaining to emergency response. These references refer to appropriate sections of the Occupational Safety and Health Standards (Title 29, Code of Federal Regulations, Part 1910, which are the OSHA General Industry Standards).

Subpart E - Means of Egress

1. 1910.37 Means of egress
2. 1910.38 Employee emergency plans and fire prevention plans
   Appendix to Subpart E - Means of egress

Subpart H - Hazardous Materials

1. 1910.119 Process safety management of highly hazardous chemicals
2. 1910.120 Hazardous waste operations and emergency response.

Subpart I - Personal Protective Equipment

1. 1910.132 General requirements - personnel protection
2. 1910.133 Eye and face protection
3. 1910.134 Respiratory protection
4. 1910.135 Occupational head protection
5. 1910.136 Occupational foot protection
6. 1910.138 Hand protection

Subpart J - General Environmental Controls

1. 1910.146 Permit-required confined spaces
2. 1910.147 Control of hazardous energy sources

Subpart K - Medical and First Aid

1. 1910.151 Medical services and first aid

Subpart L - Fire Protection

1. 1910.155-156 Fire protection and fire brigades
2. 1910.157-163 Fire suppression equipment
3. 1910.164 Fire detection systems
4. 1910.165 Employee alarm systems

Subpart R - Special Industries, Electrical Power

1. Generation, Transmission, and Distribution
Subpart Z - Toxic and Hazardous Substances

1. 1910.1030 Blood borne pathogen
2. 1910.1200 Hazard communication

13.0 RESPONDING TO WORKPLACE EMERGENCIES

Employers should establish effective safety and health programs and prepare their workers to handle emergencies before they arise.

13.1 Planning

Where required by the Occupational Safety and Health Administration (OSHA), firms with more than 10 employees must have a written emergency action plan; smaller companies may communicate their plans orally. [See 29 Code of Federal Regulation (CFR) Part 1910.38(a) for further information.] Essential to an effective emergency action plan are top management support and commitment and the involvement of all employees.

Management should review plans with employees initially and whenever the plan itself, or employees responsibilities under it, change. Plans should be re-evaluated and updated periodically. Emergency procedures, including the handling of any toxic chemicals, should include:

1. Escape procedures and escape route assignments.
2. Special procedures for employees who perform or shut down critical plant operations.
3. A system to account for all employees after evacuation.
4. Rescue and medical duties for employees who perform them.
5. Means for reporting fires and other emergencies.
6. Contacts for information about the plan.

13.2 Chain of Command

An emergency response coordinator and a back-up coordinator must be designated. The coordinator may be responsible for plant-wide operations, public information and ensuring that outside aid is called in. A back-up coordinator ensures that a trained person is always available. Duties of the coordinator include:

1. Determining what emergencies may occur and seeing that emergency procedures are developed to address them.
2. Directing all emergency activities including evacuation of personnel.
3. Ensuring that outside emergency services such as medical aid and local fire departments are called when necessary.
4. Directing the shutdown of plant operations when necessary.
5. Emergency Response Teams
Members of emergency response teams should be thoroughly trained for potential emergencies and physically capable of carrying out their duties; know about toxic hazards in the workplace and be able to judge when to evacuate personnel or depend on outside help (e.g. when a fire is too large for them to handle). One or more teams must be trained in:

1. Use of various types of fire extinguishers.
2. First aid, including cardiopulmonary resuscitation (CPR).
3. The requirements of the OSHA blood borne pathogens standard.
4. Shutdown procedures.
5. Chemical spill control procedures.
6. Use of self-contained breathing apparatus (SCBA).
7. Search and emergency rescue procedures.
8. Hazardous materials emergency response in accordance with 29 CFR 1910.120.

13.3 Response Activities

Effective emergency communication is vital. An alternate area for a communications centre other than management offices should be established in the plans and the emergency response coordinator should operate from this centre. Management should provide emergency alarms and ensure that employees know how to report emergencies. An updated list of key personnel and off-duty telephone numbers should be maintained.

A system should be established for accounting for personnel once workers have been evacuated with a person in the control centre responsible for notifying police or emergency response team members of persons believed missing.

Effective security procedures, such as cordoned off areas, can prevent unauthorized access and protect vital records and equipment. Duplicate records can be kept in off-site locations for essential accounting files, legal documents and lists of employees’ relatives to be notified in case of emergency.

13.4 Training

Every employee needs to know details of the emergency action plan, including evacuation plans, alarm systems, reporting procedures for personnel, shutdown procedures, and types of potential emergencies. Drills should be held at random intervals, at least annually, and include, if possible, outside police and fire authorities. Training must be conducted initially, when new employees are hired, and at least annually. Additional training is needed when new equipment, materials, or processes are introduced, when procedures have been updated or revised, or when exercises show that employee performance is inadequate.
13.5 Personal Protection

Employees exposed to accidental chemical splashes, falling objects, flying particles, unknown atmospheres with inadequate oxygen or toxic gases, fires, live electrical wiring, or similar emergencies need personal protective equipment, including:

1. Safety glasses, goggles, or face shields for eye protection.
2. Hard hats and safety shoes.
3. Properly selected and fitted respirators.
4. Whole body coverings, gloves, hoods, and boots.
5. Body protection for abnormal environmental conditions such as extreme temperatures.
6. Medical Assistance

Employers not near an infirmary, clinic, or hospital should have someone on-site trained in first aid, have medical personnel readily available for advice and consultation, and develop written emergency medical procedures.

It is essential that first aid supplies are available to the trained medical personnel, that emergency phone numbers are placed in conspicuous places near or on telephones, and prearranged ambulance services for any emergency are available.

14.0 FURTHER INFORMATION

More detailed information on workplace emergencies is provided in "How to Prepare for Workplace Emergencies" (OSHA 3088) available free from OSHA Publications, Room N3101, 200 Constitution Ave., N.W., Washington, D.C. 20210, telephone 202-219-4667, or local OSHA offices.