

Emergency Response Planning: Auditing Your Risk

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Key Words: emergency, response, planning, preparedness, audit, assess, risk, training

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Abstract

The following presents a process for arriving at an emergency response plan that is appropriate to the risks at your site. There are three phases in the process:

1. Performing an internal audit to assess the risks. Evaluation the response capabilities that are locally available, including HAZMAT teams, fire departments, etc.
2. Designing an exercise that will test your plan to prove its readiness.

Following the above will avoid the waste in time and money so frequently involved in emergency response planning.

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Emergency Response Planning: Auditing Your Risk

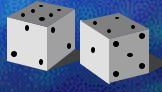
2001 ACHMM Conference

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Key Plan Requirements

- Site and risk specific
- Current and properly distributed
- Training and exercises regularly to ensure preparedness
- In compliance with law and company policy



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Mandatory Plan Components

- Emergency criteria
- How to implement the plan
- Emergency notification/evacuation/accountability
- Emergency command/authority
- Communications (types/redundancies)
- Resources and response procedures
- Termination/critique procedures



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Emergency Plan Format

- Table of contents (whole document & sections)
- Some method for fast/easy reference in an emergency
- Page #s, document name, & revision date
- Distribution/revision log with numbered plans

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Some Possible Facility Emergencies

- Medical - 911, First Aid, ALS, Transport System?
- Security - 911, Internal, External?
- Fire - 911, Internal, External?
- Man-Made - Bomb/Chemical/Biological Terrorism?
- Haz-Mat - Incidental spill, Emergency Response, Hazardous Waste?
- Natural Disaster - Earthquake, Flood, Wind, Ice, Tornado?
- Utility - Water, Sewer, Electricity, Gas?

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Emergency Plan Language

- Mandatory: Use "Shall, Must & Will"
- Non-Mandatory: Use "Would, Should & Could"

Do not mix mandatory and non-mandatory requirements in your plan!

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Examples of Emergency Procedure Language

Wrong: "In an emergency all personnel **should** evacuate to a safe location within 5 minutes"


Right: "Upon hearing or seeing the evacuation alarm, all personnel will go to the primary or secondary assembly area as soon as possible"

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Special Emergency Considerations

- The physically challenged
- Visitors, vendors & contractors
- New or part-time employees
- Non-English speaking personnel
- Persons working alone without Checking/signing in



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Getting Started

Mandatory Requirements:

- Internal- policies, procedures, plans, training, corporate/plant/insurance requirements
- External- regulatory impact-federal, state and local regulations

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At a minimum look at:

- 1910.1200 Hazard communication
- 1910.38 Emergency plans
- 1910.165 Alarm systems
- 1910.120 Hazwoper
- CFR 40 Title 3 (SARA)
- CFR 355-372 (EPCRA)
- 1910.119 Process safety management
- CFR 40 68 Risk management planning

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Training Requirements

- Notification/evacuation- criteria and system (equipment/PPE requirements)
- Emergency plan elements
- Emergency procedures (what to do, when/how to do it)
- Emergency response - what level? by whom? and when?
- Evaluation (critique) techniques

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Minimum Planning Requirements

- Notification system
- Emergency procedures
- Hazard communication
- Evacuation/accountability system
- Training

Don't Forget: visitors, vendors, contractors & part-time employees!

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Exercising Your Plan

(Three types of exercises)

- 1 - Tabletop
- 2 - Tabletop/communication
- 3 - Practical evacuation/response

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Emergency Operations Center (EOC) Considerations

- Primary/secondary location?
- Communications: internal/external?
- Power/lighting?
- Food/water/restroom facilities?
- Access/safety/security?
- Separate from evacuees, the public, and the media?

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Basic Rules (Exercising Your Plan)

- Start with a tabletop exercise
- Set up an annual schedule
- Critique and improve as you go
- Work with regulatory and emergency response agencies
- Look at being safe & legal first! (quality & speed come with practice!)

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Continuous Improvement Techniques

- Data archival/revision system
- Data distribution/data comprehension
- Focus on systemic deficiencies
- Strive for near-miss vs. injury, illness, & property damage cases
- Focus on dynamic risk assessment and planning through regular audits

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Remember the Order of Successful Planning

- First: Develop the plan
- Second: Verify the plan is safe/legal
- Third: Distribute the plan
- Fourth: Train personnel regarding their roles in the plan
- Fifth: Exercise the plan, starting with a tabletop exercise

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Emergency Plan Audits

- Audits must be written, standardized and cover mandatory Internal/External Requirements
- Verify the audit data and develop a "worst risk first" action plan.
- Monitor audit items to insure their timely completion
- Remember that the critique counts as a part of the plan audit

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Auditing for Compliance

- Internal/external policies, procedures, plans & training
- Law
- Safety Systems- Complaints, Accidents Near-Misses, OSHA/EPA & Litigation
- History-Industry/Process Trends
- Random interviews and exercises

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A Successful Emergency Planner Will...

- **Plan** based upon their risk!
- **Train** to the Level required to be safe, legal, and manage their risk
- **Exercise the Plan** to insure that they can do what they say they can do consistently!

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