# Emergency Response Plan

<table>
<thead>
<tr>
<th>Regulatory Citation</th>
<th>OSHA - 29 CFR 1910.120(q)(1) - Emergency Response Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>What It Is</td>
<td>Standard improves the ability of employees and employers to respond to emergencies caused by releases of hazardous substances.</td>
</tr>
<tr>
<td>Who It Applies To</td>
<td>Employers who expect their employees to respond to uncontrolled releases of hazardous substances</td>
</tr>
<tr>
<td>Origination Date</td>
<td>3-6-1989</td>
</tr>
</tbody>
</table>

## Overview

The Occupational Safety and Health Administration (OSHA) sets hazardous waste operations and emergency response (HAZWOPER) regulations that require individuals in a workplace assigned to emergency response operations to be properly trained in emergency response procedures. Proper emergency planning and response are important elements of the safety and health program that help minimize employee exposure and injury. An emergency response plan must be developed and implemented to handle anticipated emergencies prior to the start of emergency response operations.

The emergency response plan must address:

1. Pre-emergency planning;
2. Personnel roles, lines of authority and communication;
3. Emergency recognition and prevention;
4. Safe distances and places of refuge;
5. Site security and control;
6. Evacuation routes and procedures;
7. Decontamination procedures;
8. Emergency medical treatment and first aid;
9. Emergency alerting and response procedures;
10. Critique of response and follow-up; and
11. PPE and emergency equipment.

Emergency response organizations may use either the local or state emergency response plan, or both, as part of their emergency response plan to avoid duplication of federal regulations. The plan requirements must be rehearsed regularly, reviewed periodically and amended, as necessary, to keep them current with new or changing site conditions or information. A distinguishable and distinct alarm
system must be in operation to notify employees of emergencies. The emergency plan must also be made available for inspection and copying by employees, their representatives and OSHA personnel.

Employers who will evacuate their employees from the danger area when an emergency occurs, and who do not permit any of their employees to assist in handling the emergency, are exempt from these requirements if they provide an emergency action plan in accordance with 29 CFR 1910.38(a).

**Pre-Emergency Planning**

Facilities are required to coordinate their emergency response activities with both outside and emergency response organizations. The emergency response plan must address coordination with outside emergency response organizations, such as fire departments and ambulance or hospital emergency room services and privately operated emergency response companies.

Employers must notify the organizations listed that they are part of the company’s emergency response plan and detail their expected involvement in the event of an incident. Phone numbers and contact personnel must be readily available and correct.

**Personnel Roles, Lines of Authority and Communication**

Response roles should be clearly defined by naming individuals and their projected role in emergency response operations. Where response activities exceed the defensive action stage, there must be an on-scene incident commander, and at a minimum, two hazardous material technicians identified.

Lines of authority must also be clearly addressed. Initial communication channels should be directed to the on-scene incident commander quickly in the event of an emergency. Although first responders at the awareness level may be expected to inform their supervisors in the event of an emergency, the supervisor should be trained to inform the emergency response personnel.

Lines of communication need to be clearly delineated in the emergency response plan. Essentially all employees that may encounter the uncontrolled release of hazardous substance that requires an emergency response should be addressed in the plan. The employees must understand who they are to report a release to. These preordained lines of communication need not be developed for each individual employee, but rather can be developed for different groups of employees from different areas within a facility, which report to the same individual in the event of an emergency.
Means of communication to be used during an emergency response must be established and written into the emergency response plan. This might include dedicated radio frequencies, hand signals and siren blasts. A system to communicate evacuations of all potentially affected employees who are not designated as emergency responders must be developed.

**Emergency Recognition and Prevention**

The emergency response plan must define exactly what may be handled as an incidental release and what type of release requires an emergency response. Employees may be required to shut down processes, close emergency valves and otherwise secure operations before evacuating in the event of an emergency. These procedures need to be carefully delineated and employees must be trained to be able to perform these pre-evacuation procedures safely. Employees instructed to evacuate during an emergency may not perform pre-evacuation procedures in the danger area.

Emergency responders may take action in the danger area necessary to stop the incident from increasing in severity before the emergency response team arrives, only if they have informed the incident command structure of the emergency incident and have adequate personal protective equipment and training and employ the buddy system. This kind of response must be addressed and examined in detail within the plan and emergency responders must act within the capabilities of their training and equipment, have clear guidance and training in this determination, and be clearly told that they may evacuate without employer penalty if they subjectively believe it is beyond their capabilities.

**Safe Distances and Places of Refuge**

The emergency response plan should contain a site map with safe places of refuge identified for each section of the facility. Ideally, the map should contain the location of all buildings, structures, equipment, emergency apparatus, first aid station, routes of entry and exit, emergency exit routes, staging areas and safe places of refuge.

The safe places of refuge will be the areas in which accounting of all employees will be performed. This will be important for identifying any individuals that did not get out and estimating where they may be in the facility. Allowances should be made to ensure that this information is given to the emergency response organization in a timely fashion.
Emergency Response Plan

Site Security and Control

Areas surrounding the danger area need to be controlled during emergencies by prohibiting unauthorized personnel from entering the exclusion zone or hot zone. Methods of excluding areas and defining various zones need to be addressed in the emergency response plan. Emergency responses need to be coordinated from a command post some safe distance from the exclusion zone. Creation of a command post must be addressed in the plan.

Evacuation Routes and Procedures

All employees that are not trained in emergency response, and who will not serve as response employees during the response operation, need to be evacuated from the exclusion zone. The plan should address the routes and procedures these employees must follow.

Decontamination Procedures

The emergency response plan must contain provisions for decontamination of emergency responders leaving the exclusion zone. Individuals who will assist the responders as they leave the exclusion area must be trained in decontamination procedures. These individuals should wear personal protective equipment at the same level or one level below the emergency responders they are supporting. Accidental contamination of response personnel should also be addressed in the plan, including the location and availability of showers, water hoses and eye flushes.

Decontamination of response equipment and the contaminated area may be handled in the post-emergency response, and therefore decontamination procedures for these areas do not necessarily need to be part of the emergency response plan. However, if emergency responders are expected to decontaminate their own equipment or the contaminated area, then the procedures to be followed must be included in the emergency response plan.

Emergency Medical Treatment and First Aid

This section of the emergency response plan should list all qualified emergency medical technicians onsite, their certifications and how to best contact them during an emergency. Additionally, hospitals
that are capable of receiving or responding to accident victims that may arrive contaminated, must be listed.

If victims must be decontaminated at an area hospital, coordination with the hospital is required prior to the emergency in order to ensure the hospital has personal protective equipment, methods of containing the hazardous material waste water, etc. and staff trained to at least the operations level that are capable of performing decontamination.

Emergency Alerting and Response Procedures

This section of the emergency response plan should address how employees will be informed that an emergency exists and how they should respond. There are two important questions that need to be addressed:

1. Who needs to be made aware of the emergency?; and
2. What do they need to be told to do?

The alarm systems must inform all affected personnel that a potential emergency exists and what their immediate response should be. Depending on size and the magnitude of the potential emergency, all affected employees may include all employees, or just employees from a limited area. If the facility intends to evacuate employees from limited areas in response to emergencies, it must have alerting procedures in place that can communicate to those employees that must evacuate, and to only those employees.

Critique of Response and Follow-Up

Formalized procedures for the critique of an emergency response must be written into the emergency response plan. Appropriate changes should be made in the emergency response plan in accordance with the results of a critique of a specific incident. Time spent by emergency response employees critiquing incidents can be credited towards their refresher training requirements.

PPE and Emergency Equipment

This section of the emergency response plan should list the facility’s inventory of personal protective equipment (PPE) and emergency response equipment. The plan should include instructions on how the PPE and equipment is to be used, their limitations and when emergency responders should use...
them. Emergency responders are required to be trained in selection of proper PPE, and the incident commander must be aware of the equipment and PPE available during an emergency.

FAQ & Interpretations

Follow these links:


https://www.osha.gov/Publications/osha3122.pdf