

The Dell Group, Inc.

Creative **Solutions** for your compliance burdens

Emergency Spill Response Team Development

Hazardous Waste Operations and Emergency Response HAZWOPER OSHA 29 CFR 1910.120(q)

Compliance Training Program	Normal Length	Cost per Session	Cost per Trainee
1 st Responder - Awareness	3 Hours	\$750.00	\$18.00
1 st Responder - Operations	8 Hours	\$1,600.00	\$30.00
HazMat Technician	24 Hours	\$4,800.00	\$55.00
HazMat Specialist	Quoted on case by case basis		
Incident Commander	4 Hours	\$1,100.00	\$25.00
Refresher	8 Hours	\$1,600.00	\$30.00

Compliance Programs

Basic Spill Response Plan - For smaller businesses with limited amounts of hazardous chemicals, and employees who only respond "defensively" to limit the spread or prevent contamination of sewers, surface and ground waters. Site Specific. \$325.00

Chemical Emergency Preparedness Plan - This "5-in-1" master plan contains preparedness policies, prevention planning, and emergency response procedures. It may be used to satisfy EPA requirements under hazardous waste laws which require a Hazardous Waste Contingency Plan, or for Clean Water Act SPCC Plan, or OSHA HAZWOPER requirements for emergency response at fixed facilities. It is designed to contain your existing emergency evacuation, and fire prevention plans. If none exist, we will develop them first. Price includes facility survey to customize for your operations. \$2,000.00

P.O. Box 1390, Mentor, OH 44061-1390 – (440) 266-0403 – FAX (440) 266-0413

<http://www.dellgroup.com/>

EMERGENCY RESPONSE TO RELEASES UNDER THE OSHA HAZWOPER STANDARD

Covers Broad Range of Industries

No it's not the latest toxic offering from Burger King, but what's in a name? Originally developed to control the activities of employees working at hazardous waste sites, OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) standard now covers a broad range of industries in which hazardous substances are used, industries that may include your own. The standard regulates the creation of emergency response plans and the requirements of hazardous materials (HAZMAT) teams at industrial facilities using hazardous substances.

What is a Hazardous Substance?

It is HAZWOPER'S definition of a hazardous substance that gives the rule such great scope. Briefly, a hazardous substance is defined as any material that could damage human health or the environment if accidentally released.

This definition includes such common chemical materials as gasoline and diesel fuel, vastly increasing the number of regulated companies. Many of the chemical substances used in industry are contained within this definition few industries are immune.

Three Compliance Strategies

The key to understanding and complying with HAZWOPER is to know the amounts and types of hazardous substances at your facility and to plan around them. The pathway to compliance is mapped out in the regulation.

First and foremost, your facility must decide on an overall response plan. The standard provides three choices in the case of an accidental release:

- * Evacuate
- * Act Defensively in Containing the Spill
- * Act Aggressively in Abating the Spill

Evacuation: Your facility may be exempt from further training by evacuating employees from the danger zone and not permitting any employees to assist in handling the emergency. In this case, your facility must simply provide an emergency action plan per OSHA 29 CFR 1910.38. It is important to note the absolute restriction on employee assistance in an emergency situation because this section of the regulation has led to many citations.

Employees who don a self-contained respirator and return to close a valve or use absorbents to limit the spread of a spill without proper HAZWOPER training are endangering themselves and subjecting you to a possible fine for noncompliance. If you have employees who must sound alarms or communicate possible danger and are likely to encounter releases, they need "Awareness Level" training.

Defensive Action: The regulation considers spill control and containment as defensive actions. Creating a dike, placing absorbent booms on a body of water or digging a diversionary trench are defensive. At no time does the employee attempt to close or stop the spill or leak. Acting in a defensive manner, your facility must have an emergency response plan and a detailed training program to address the first response operation level.

Offensive Action: This indicates that the emergency response team will not only contain the spill or leak, but will stop the flow and attempt to control the condition. Closing valves, plugging leaks and using absorbents and salvage over packs are all aggressive actions. Aggressive control of hazardous substance releases requires both emergency planning and specialized training at or above the level of the HAZMAT technician.

Emergency Response Planning

The regulation requires 12 components of an emergency response plan. If your facility has prepared a plan to comply with the Superfund Amendments and Reauthorization Act (Emergency Planning and Community Right-To-Know Act of 1986), you must make sure that it contains all of the regulated components, but there is no need to develop two distinct plans. The 12 components of an emergency response plan are:

1. An outline of pre-emergency planning and coordination with outside parties.
2. An outline showing personnel roles, lines of authority, training roles and programs and communication pathways.
3. Information on emergency recognition and prevention programs.
4. A plat of survey showing safe distances and places of refuge.
5. A site security and control plan.
6. A building plan outlining evacuation routes and a guide to evacuation procedures.
7. Decontamination procedures.
8. An outline of emergency medical treatment and first aid provisions.
9. Emergency alerting and response procedures.

10. Procedures for critiquing the emergency response and follow-up.
11. Inventory of personal protective equipment (PPE) available in the facility.
12. Inventory of emergency equipment available to the HAZMAT team.\

Training Your Emergency Responders

HAZWOPER training is divided into five levels:

- * First Responder Awareness Level
- * First Responder Operations Level
- * HAZMAT Technician Level
- * HAZMAT Specialist Level
- * On-scene Incident Commander

The first responder at the awareness level is an individual who is likely to witness or discover a release of hazardous materials at your company. This person is trained to notify the proper authorities of the release. These authorities should then initiate emergency response procedures. No further action than notification should be taken by this individual. OSHA does not require a specific number of training hours for the first responder at the awareness level. However, the law does require that the first responder have sufficient training or proven experience to demonstrate competency at this level. The awareness level individual should:

- * Understand what hazardous substances are and their associated risks in an incident;
- * Understand the potential outcomes of an emergency in which hazardous substances are present;
- * Be able to recognize the presence of hazardous substances in an emergency;
- * Be able to identify hazardous materials, recognize the need for additional resources and make appropriate notifications to the communication center.

The first responder at the operations level may take a more aggressive role in a spill response action, acting to control and contain a spill or release. As such, the operations level of employee must be trained in basic control containment and confinement techniques. It is important to note that the operations level employee should not be involved in offensive, or spill removal, activities, but only in a defensive role. The first responder should also be trained in the use of certain personal protective equipment, such

as escape respirators, which may be lifesaving in an emergency. This training is administered in an eight-hour training course.

The hazardous materials technician, trained at the 24-hour level, is the first employee who may take an offensive stance toward a hazardous chemical release. In addition to the training afforded the first responder at the operations level, these employees must know how to identify hazardous materials using field survey instruments, how to practice spill or release containment and hazardous material recovery and how to use personal protective equipment and emergency equipment.

A HAZMAT team consists of at least four employees trained at the 24-hour level, two primary responders and two back-ups. In total, a minimum of five employees (including the on-scene incident commander) must receive 24 hours of training in order to have a duly constituted response team.

The hazardous materials specialist represents the most advanced level of spill or release response. Specialists are trained beyond the technician level in more detailed use of chemical instrumentation for analysis and in more sophisticated risk assessment techniques. The specialist also assumes a larger leadership role in an emergency response, receiving training in the implementation of both state and local emergency response plans.

The on-scene incident commander has responsibility for controlling employees' activities at the incident until appropriate local, state or federal emergency response commander arrives. The on-scene incident commander trained on the same material as the first responder at the operations level, but with additional competencies.

The incident commander must organize the lines of communication to be used during the emergency. With the advances in mobile communications, and two-way radio systems, communication at large manufacturing or warehouse facilities have improved greatly. The same types of communications systems are useful in coordinating evacuation and security in emergencies. The incident commander must also provide site security and limit access to the site to maintain order and reduce the possibility of injury or death.

Easing Compliance

Creative Solutions has a full-range of services to help your staff prepare for emergencies and related response efforts. These services include planning, written safety and preparedness plans and a full range of training customized for your facility. Call 800.259.8930 for your FREE initial consultation.

INCIDENT COMMANDER TRAINING FOR FACILITIES WITH AN EMERGENCY RESPONSE TEAM

A Critical Piece of the Training Puzzle --

The Training Needed for the DECISION MAKERS

OSHA Says:

"The incident commander is the individual who, at any one time, is responsible for and in control of the response effort." An incident commander should be trained to fulfill the obligations of the position, including:

Analyze the incident to determine the magnitude of the response problem.

Plan and implement appropriate responses with available personnel and equipment.

Implement a response to favorably change the outcome of the incident consistent with the local emergency response plan and the organization's standard operating procedures.

Ability to evaluate the progress of the emergency response to ensure that the response objectives are being met safely, effectively, and efficiently.

Ability to adjust the response plan to the conditions of the response and to notify higher levels of response when required by the changes to the response plan."

Have your Emergency Coordinators been trained and drilled to perform the above duties efficiently??? Are they confident in their ability to:

Select the Appropriate Respirator? Select the Appropriate Protective Clothing?

Select the Appropriate Response Actions? Deal Effectively with the Media?

Coordinate In-house Efforts with Public Responders?

IF NOT, THIS COURSE IS FOR YOU!

Four-Hours, including Textbook and Exercise. \$1,100.00 per session, plus \$18.00 per trainee