



**ISRI**<sup>TM</sup>

# SAFETY GUIDANCE MATERIAL

## SAFETY MANAGEMENT GUIDANCE

*This safety resource was written for the scrap industry by the scrap industry and was developed to assist you in making your scrap operation a safe place for employees, customers, and visitors. The best safety programs are custom-tailored to individual operations. These resources offer sample wording of policies and procedures.*

### EMERGENCY ACTION PLAN

**APPLICABLE STANDARD:** 1910.38

**EMPLOYEES AFFECTED:** All employees

#### WHAT IS IT?

An emergency action plan is a predetermined plan for how your business will respond to (a) getting help to an injured worker and (b) getting all personnel to evacuate the property or seek refuge during an emergency situation.

#### WHY IS IT IMPORTANT?

When an emergency strikes, every second counts. There is no time to start thinking about what has to be done, where, or by whom. From getting medical attention to a severely injured worker to getting all employees out of a burning building, seconds spell the difference between life and death. Having an established emergency response plan can save your property, your assets, and—most importantly—your employees.

#### WHAT IS REQUIRED?

- Develop an emergency action plan that states specifically how the operation will respond during an emergency situation.
- Train employees on specific emergency procedures.
- Perform practice drills, and adjust the plan based on results.

#### HOW DO YOU DO IT?

##### **Start talking**

The truth is, no one wants to talk about emergency situations. However, if you don't develop a plan before you need it, your emergency response is destined to fail. The key to getting your plan off the ground is to begin the dialog. Assemble your leadership team and ask, "What if?" Take a step at a time, considering every operation in your yard. Soon, you will get an idea of how prepared you are for a likely emergency.

For example, you might come up with scenarios and questions like these:

*"What if a worker amputates an arm at the shear?"*

- Who goes for help?
- How are other people alerted to the injury (radio, intercom, etc.)?
- Who calls 9-1-1? Do they know where the phone is and how to make the call? (In some facilities, where you first have to dial 9 to get an outside line, the emergency number may actually be 9-9-1-1.)
- Do emergency responders know where to go?
- Who will meet emergency responders at the gate and bring them to the injured person?



“What if we accidentally break open a scrap container filled with poisonous or flammable gas and we need to evacuate the premises?”

- How do we alert workers, visitors, contractors, etc. about the evacuation?
- Once people evacuate, where do they go, and what are they supposed to do when they get there?
- Who calls outside rescue?
- Does outside rescue know where to go?
- Who calls neighboring property owners?
- Who serves as media contact? Do they know their role?

The good news is that right now you don’t have to have all the answers, because the emergency isn’t happening right now. The key to emergency planning is balance. You want to think “worst case,” but don’t get bogged down in discussing far-out possibilities that could rarely happen. The best way to qualify the scenario is by asking two questions:

- What is the likelihood of it happening?
- If it does, how bad will it be?

You can build your scenarios into a table like this:

		Severity of consequences (how bad will it be?)	
		LOW	HIGH
Likelihood of occurrence	HIGH	<ul style="list-style-type: none"> <li>• Heavy rains</li> <li>•</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Fire</li> <li>•</li> <li>•</li> </ul>
	LOW	<ul style="list-style-type: none"> <li>• Hordes of locusts</li> <li>•</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Gas main leak</li> <li>•</li> <li>•</li> </ul>

After completing this exercise, you can prioritize the list and target the HIGH/HIGH areas first.

### Building the plan

Building an effective emergency response plan is nothing more than developing a system to communicate during an emergency and assigning responsibility to ensure certain tasks get completed. Appendix A presents a sample emergency response plan.

*Internal communication.* Think about your operation. How would you communicate to your entire staff that they need to evacuate? On the reverse, how would a single worker communicate to you (and critical staff) that someone is seriously hurt in the back part of the yard? From cell phones to radios to intercoms, the possibilities are endless. The key is to use a consistent system and make sure everyone is aware of it. Also as part of a strong program, emergency evacuation posters showing means of egress and meeting spots must be located throughout the facility.

*External communication.* Most emergency situations require some kind of outside assistance. Develop a system that ensures that the call for help is made quickly and that the person making the call has all of the pertinent information to get the right rescue workers to the scene as soon as possible. Aside from rescue workers, make sure you have a system to alert neighbors and/or other operations if the emergency involves them.

*Internal response.* What are people supposed to do? This is a very simple question that requires a complex answer. As part of each emergency scenario, you need to develop responsibilities to ensure certain tasks get done. These tasks can include:

- calling for outside assistance
- meeting rescue personnel at the front gate

- managing traffic in the yard to allow emergency workers access
- evacuating to the meeting spot
- taking head counts of other workers
- shutting down critical equipment
- talking to the media.

When determining whether you would like workers to be part of a firefighting effort, remember that *no building or piece of equipment is worth a life*. Getting all of the employees out is a perfectly acceptable emergency response plan. If you do in fact expect workers to fight a fire, they would fall under OSHA regulation 29 CFR 1910.157 and must undergo extensive training in using firefighting equipment.

*External response.* The best way to get an efficient and effective response from outside rescue workers is to have a great working relationship with them prior to your needing them. Meetings, familiarization tours, and on-site drills will allow rescue workers to understand your operation without the chaos of a real emergency situation. A key point to remember is that when they show up on site during an emergency, they are now in charge, and you are not.

## **Training**

The importance of making sure employees know what to do and where to go during an emergency situation cannot be stressed enough. Emergency response training should be part of your ongoing training schedule, and it must be part of your new employee orientation program. Training should at least cover alarms and notification systems, evacuation routes, and meeting spots.

## **Drills**

Most operations will tell you there is never a good time to conduct an emergency training drill, but that shouldn't stop you from having one. Having a drill will provide essential feedback on how in-tune everyone is with the plan. If a drill produces poor results, your company should require retraining and redrilling to ensure the plan truly works when needed.

## **APPENDIX A: Sample Emergency Response Plan**

The following plan, from a real scrap processing company, is provided as an example.

### **ABC COMPANY EMERGENCY RESPONSE PLAN**

#### **Purpose**

ABC Company is dedicated to the protection of its employees from emergencies such as tornadoes and fires. When emergencies do occur, our Emergency Action Plan (EAP) is initiated. This EAP is in place to ensure employee safety from emergencies during regular hours and after hours. It provides a written document detailing and organizing the actions and procedures to be followed by employees in case of a workplace emergency.

OSHA's Emergency Action Plan requirements, found at 29 CFR 1910.38, require ABC Company to have a written Emergency Action Plan (EAP). This plan applies to all operations in our company where employees may encounter an emergency situation.

The EAP communicates to employees policies and procedures to follow in emergencies. This written plan is available, upon request, to employees, their designated representatives, and any OSHA officials who ask to see it.

#### **Administrative duties**

The Local Manager (or designee) is the EAP administrator, who has overall responsibility for the plan. This responsibility includes the following:

- developing and maintaining a written EAP for regular and after-hours work conditions
- notifying the proper rescue and law enforcement authorities and the building owner or superintendent in the event of an emergency affecting the facility
- taking security measures to protect employees
- integrating the EAP with any existing general emergency plan covering the building or work area occupied
- distributing to each employee procedures for reporting emergencies, the location of safe exits, and evacuation routes
- conducting drills to acquaint employees with emergency procedures and to judge the effectiveness of the plan
- training designated employees in emergency response, such as the use of fire extinguishers and the application of first aid
- deciding which emergency response to initiate (evacuate or not)
- ensuring that equipment is placed and locked in storage rooms or desks for protection
- maintaining records and property as necessary
- ensuring that our facility meets all local fire codes, building codes, and regulations.

The Local Manager has full authority to decide to implement the EAP if he/she believes an emergency might threaten human health. The following potential emergencies might reasonably be expected at this facility and thus call for the implementation of this EAP:

- fires
- fuel or chemical spills
- tornadoes.

Copies of this plan may be obtained from the Safety Department in the Corporate Office building. The Corporate Safety Director is responsible for reviewing and updating the plan as necessary. The Corporate Safety Director can be contacted regarding further information about the written EAP or an explanation of duties under this plan.

Key management personnel home telephone numbers are kept in the main office, for immediate use in the event of an emergency. These key management members include:

- General Manager
- Office Manager
- Yard Manager
- Warehouse Manager
- Scale Manager

If, after reading this plan, you find that improvements can be made, please contact the Corporate Safety Director. We encourage all suggestions because we are committed to the success of our EAP. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

### Alarms

Different emergencies call for different alarms to indicate what actions employees should take. ABC Company has established an employee alarm system. We have 10 or fewer employees, therefore we use direct voice communication as our means for alerting employees to an emergency. We will use the tornado alarm to warn employees of tornado watches and warnings.

We have posted the following emergency telephone numbers near telephones, on emergency notice boards, and in other conspicuous locations for use when telephones serve as a means of reporting emergencies:

#### Emergency responder:

#### Telephone number:

Emergency

911

Local Hospital

\_\_\_\_\_

Local Police

\_\_\_\_\_

Local Utility Companies

\_\_\_\_\_

### Emergency reporting and weather monitoring procedures

#### *In the event of an emergency requiring evacuation*

When employees detect an emergency that requires an evacuation, such as a fire or hazardous release, they should notify co-workers in the same building or work area, and then take appropriate precautions. These include notifying a supervisor to contact the fire department, and seeking shelter in the event of severe weather. A member of management will notify the local fire department.

Our backup method for reporting emergencies that require evacuation includes the immediate and direct contact of respective authorities by the employee having first knowledge of the emergency.

#### *In the event of a tornado watch*

When the National Weather Service issues a tornado watch, the weather page will sound, followed by a weather bulletin with further information. At that point, the safety manager or designee will turn on the scanner to monitor the National Weather Service reports. The safety manager will use the tornado alarm to warn employees of the threat of weather emergencies. He/she will sound the alarm for both watches and warnings.

Our backup method for monitoring tornadoes includes monitoring of local Doppler via Internet.

## **Evacuation procedures**

Some emergencies require evacuation or escape procedures, while some require employees to stay indoors or in a safe area. Our emergency escape procedures are designed to respond to many potential emergencies, depending on the degree of seriousness. Nothing in these procedures precludes the Local Manager's authority in determining whether employees should remain inside or evacuate.

Our emergency evacuation procedures and assignments are designed to respond to many potential emergencies, including fires.

Employees need to know what to do if they are alerted to a specific emergency. After an alarm is sounded to evacuate, employees should take the following steps:

- Cease work and proceed to the nearest available and safe exit to leave the facility.
- Make sure all customers and other non-employees are evacuated.
- Once evacuated, head toward their designated exterior or safe area, where a head count will be performed and further instructions given.

## **Procedures to account for employees**

Trained evacuation personnel assist in safe and orderly evacuation for all types of emergencies that require evacuation. The employees selected are trained in the complete workplace layout and the various alternative escape routes from the workplace. Before leaving, these employees check rooms and other enclosed spaces in the workplace for employees who may be trapped or otherwise unable to evacuate the area.

This list indicates a sufficient number of employees who have been designated by the company and trained to:

- direct and assist in safe and orderly emergency evacuation
- provide guidance and instruction for all types of emergency situations
- be aware of employees with special needs who may require extra assistance
- use the buddy system
- avoid hazardous areas during an emergency evacuation.

The list of trained personnel includes at least one person from every area for every shift. This means that every trained evacuation person is responsible for seeing to approximately ten or fewer evacuated employees. The trained personnel also serve as a resource of information about emergency procedures and conduct head counts once evacuation is complete.

Frontline supervisors must be aware of the locations of those employees working on a particular day when an emergency occurs, as well as suppliers, customers, and other non-employees on the premises, and be aware of who is absent or otherwise away from the premises. Accounting for employees and non-employees will aid local responding fire and rescue departments in determining whether rescue efforts are necessary.

Each department reports to its respective representative in person or by radio to its immediate supervisor. Once each evacuated group of employees has reached its evacuation destinations, each trained evacuation employee:

- takes roll of his or her group
- makes sure all persons are accounted for
- reports in to a central checkpoint managed by the local manager
- assumes the role of department contact to answer questions.

Head count results should be given to the local fire chief or firefighter, if requested.

Other duties provided by the trained personnel during an emergency evacuation include notifying firefighters of any special hazards present in terms of scrap material (e.g., magnesium).

No employees are to return to the buildings until advised by the Local Manager or designee (after determination has been made that such re-entry is safe). If anyone is injured or contaminated, the Local Manager will activate rescue and first aid actions. If an emergency incident expands, the Local Manager may send employees home by normal means or provide them with transportation to an offsite location.

### **Non-evacuation emergency procedures**

ABC Company has the following non-evacuation procedures:

- Taking shelter in the event of tornado.

### ***Responding to a tornado alarm***

In the event of a tornado, it is corporate policy to provide emergency warning and shelter. Once employees are made aware of a tornado situation, they are to follow these procedures:

- Alert visitors to the emergency and take them to the nearest shelter.
- Stay away from windows, but stay inside the building they are in.
- Remain in the shelter and do not return to regular duties until the all-clear is given.

The Local Manager will monitor the radio for information and advice from the local government and weather service. The Local Manager will determine when it is safe for employees to leave their tornado shelter and return to work. At that time, the Local Manager will notify departmental supervisors by radio or direct contact. If there is structural damage, the Local Manager will assess the damage and ensure that appropriate actions are taken to provide for employee safety and security as well as structural soundness.

If anyone is injured or contaminated, the Local Manager will activate rescue and first aid actions.

### **Plan administrator duties**

During an emergency, the Local Manager will do the following:

- Assess the situation to determine whether an emergency exists requiring activation of emergency procedures.
- Supervise all efforts, including evacuating employees.
- Call outside emergency services.
- Take all necessary measures to contain the hazard and prevent its spread to other nearby areas, with the assistance of emergency personnel.
- Direct the shutdown of facility operations when required.
- If the emergency involves the release of a biological agent, turn off the ventilation system in the building.
- If the emergency is a hazardous material spill, ensure that the hazardous material and any material with which it came into contact (gravel, soil, etc.), is scraped up using shovels and/or brooms. All this combined material will be considered hazardous waste unless analysis shows otherwise.
- Provide for collection, treatment, and disposal of the waste and contaminated material by the emergency crew or outside contractor, as appropriate.
- Ensure that contaminated soil, liquids, or other materials are placed in drums and handled as hazardous waste.
- Ensure that the emergency crew restores all emergency equipment to full operational status.
- Assisted by other qualified persons, begin to investigate the cause of the emergency and take steps to prevent a recurrence of such or similar incidents.
- Ensure that the cause of the emergency is investigated and eliminated and that clean up and restoration progress at least to the point of not jeopardizing the health and safety of the employees, and that EPA, state, and local authorities are notified, if required.

- Ensure that for spills or releases involving a hazardous substance at or above its reportable quantity, the following necessary information is recorded and reported: name of chemical(s) involved; whether the substance is listed under 40 CFR 302 (extremely hazardous substances); estimated quantity of the released substance; time of the release and duration; medium into which the substance was released; health risks associated with the release; precautions taken to respond to the release; name and telephone numbers of persons who can be contacted for further information.

### **Rescue and first aid**

Rescue and first aid may be necessary during emergency situations. Professional emergency services responding in an emergency will help with and direct all rescue and medical duty assignments upon their arrival on site. Appropriate first-aid supplies have also been provided.

Circumstances calling for rescue or first aid include:

#### **Circumstances:**

Personnel caught in equipment

#### **Procedures:**

Contact Maintenance Manager immediately to determine machine shutdown/extraction procedure

### **Training**

Our Local Manager reviews the EAP with each of our employees at the following times:

- initially when the plan is developed
- whenever a new employee is hired
- whenever the employee is assigned initially to a job
- whenever an employee's responsibilities or designated actions under the plan change
- whenever new equipment, materials, or processes are introduced into the workplace
- whenever the layout or design of the facility changes
- whenever the plan is changed.

The training includes the following:

- employee roles and responsibilities
- threats, hazards, and protective actions
- notification, warning, and communications procedures
- means for locating family members
- emergency response procedures
- evacuation, shelter, and accountability procedures
- location and use of common emergency equipment
- emergency shutdown procedures.

The information in this plan is not intended for casual reading, but is intended to get the appropriate message across. We present the material for training in the following manner:

- safety meetings
- hands-on demonstrations.

## Drills

ABC Company performs drills for the following emergencies:

- fire
- tornado.

We hold these drills at least annually.

After a drill, the Local Manager judges the effectiveness of the plan and reviews any employee input concerning the drill. Employees performing the drill may identify something that did not follow procedure or was ineffective. For example, they may discover doors that would not open; they may enter storage closets instead of exiting; they may get lost and confused; or they may carry a suspicious package through the facility. These are the types of things the Local Manager needs to hear about after a drill. That way, these issues can be addressed before a real emergency.