



6.0 Emergency Preparedness and Response

6.1 EMERGENCY PREPAREDNESS

6.2 IDENTIFY EMERGENCY RESPONSE PRACTICES

6.3 EMS PROCEDURE FOR EMERGENCY PREPAREDNESS AND RESPONSE

6.4 EMERGENCY PREPAREDNESS AND RESPONSE COMPLETION CHECKLIST





6.1 Emergency Preparedness

Keys



Establish and maintain procedures to respond to and report, as appropriate, accidents, malfunctions, spills, upsets, and other emergency situations, and to mitigate any associated environmental impacts, and provide for a review of the procedures after the occurrence of an accident or emergency.
[R 324.1505(2)(b)
(vii)]

An EMS requires an emergency preparedness and response element as part of the system. Most facilities have some form of emergency response procedures in place in the event of an emergency, spill or fire, and to meet OSHA and EPA requirements. For the EMS, a general emergency response plan needs to be developed to encompass the following four items.

1. Emergency response,
2. Emergency reporting,
3. Review of incidents and procedures,
4. Practice emergency response.

Designate a central emergency response coordinator.





6.2 Identify Emergency Response Practices

Keys



Have you made arrangements with your local emergency response providers?

- **Local fire departments**
- **Local police departments**
- **Local health care provider/hospital**

Identify what emergency response plans or procedures you currently have in place and the equipment and resources required. Look for the following items.

- Emergency response and spill plans (e.g., SPCC, PIPP, SWPPP, Contingency Plans - RCRA, Air Malfunction Abatement Plans, Fire Evacuation Plans);
- Emergency response equipment listing and location (e.g., fire extinguishers, spill kits, eye wash stations, oil absorbent);
- Safety systems (e.g., sprinklers, hoses, alarms);
- Communication systems (e.g., telephone, two-way radio, verbal);
- Location of MSDSs or hazard information for reference;
- Building diagrams - Facility layout and process flow;
- First responder for emergencies (e.g., local fire departments, Hazmat teams, ambulance/local hospitals);
- Emergency and required notifications (e.g., plant security, MDEQ, EPA, county).

Identify potential hazards or significant impacts that would require emergency response in the event of an accident, malfunction, spill, process upset, or other situations, such as:

- Aboveground and underground storage tanks - spill potential during loading or unloading, failure and puncture;
- Transport of oils and chemicals to, from and within the facility - spill potential during loading or unloading;
- Air pollution control equipment that could malfunction;
- Storage areas or process equipment that house flammable, combustible or toxic materials;
- Fire or spark hazards.





6.2 Identify Emergency Response Practices (cont.)

In addition, check the significant impacts that you identified in Section 2.6 and determine if the emergency response procedures you have in place are adequate for the type of impact.

List the procedures and resources currently available at your facility and identify gaps that must be filled for your EMS. On the following page is an example table of emergency response practices for Joseph's Forklift and Hauling Company. A blank table (Form 6.1) is provided for your use or you can create your own documentation table/system for emergency response practices.



EXAMPLE 6.1

Joseph's Forklift and Hauling Company

Emergency Response Practices

<u>Type of Emergency Response / Plan</u>	<u>Emergency Coordinator</u>	<u>Coverage and Equipment</u>
Boiler Operations- Air Malfunction Abatement Plan	Operations Supervisor	Boiler operations/ Shut down procedures in place
Storm Water Pollution Prevention Plan- SWPPP	Storm Water Operator	All operations that could impact storm water are covered.
Spill Prevention, Control and Countermeasures / Pollution Incident Prevention Plan- SPCC/PIPP	Central Emergency Response Coordinator	Oil and chemical spills, response and equipment
Fire Evacuation Plan	Administration	Maps, locations of equipment, contacts for local responders
Tornado and Emergency Response Plan	Administration	Maps, alarm system, evacuation, and response

Approved by: Chris Josephi

Date: August 29, 1999



6.3 EMS Procedure for Emergency Preparedness and Response

Keys



Make sure that the procedure(s) for Emergency Preparedness and Response include all emergency and spill plan requirements mandated by law or regulatory agencies.

A procedure for Emergency Preparedness and Response should be developed for your EMS. The procedure needs to include:

- Emergency response requirements,
- Implementation and emergency response chain,
- Emergency notifications and reporting,
- Review of incidents and procedures, and modification of procedures in response to findings,
- Practice and training for emergency response.

On the following page is a procedure for Emergency Preparedness and Response for Joseph's Forklift and Hauling Company's EMS. Also, included for your review is an Emergency Preparedness and Response procedure for Denso Mfg. Michigan, Inc., which was developed for their EMS. Review these examples and develop your procedure for your system documentation.



EXAMPLE 6.2

Joseph's Forklift and Hauling Company

EMS Procedure No. EMS-5 Emergency Preparedness and Response

I. Purpose

This procedure is to establish and maintain emergency preparedness and response procedures for Joseph's Forklift and Hauling Company.

II. Scope

This procedure for emergency preparedness and response contains provisions to identify, implement, and update emergency response programs necessary for facility operations.

III. Definitions

N/A

IV. Procedures

A. Identify Emergency Preparedness and Response Plans

Identify emergency response plans and procedures that are in place for all operations and activities. Include the following types of plans:

- Spill Plans- SPCC, PIPP, etc.,
- SWPPP,
- Air Malfunction Abatement Plans,
- Fire, explosions, general emergencies, and injuries, and
- Contingency plans - RCRA.

Create a general listing of emergency preparedness and response plans as a reference for the EMS.

B. Identify Emergency Response Equipment

Identify and locate necessary emergency response equipment. Create a list of equipment locations for easy reference on a facility map. Include the following types of equipment:

- Fire extinguishers,
- Spill kits,

- Absorbent materials,
- Eye wash stations,
- Mops, brooms, buckets, shovels, etc.,
- Personal protective equipment,
- First aid kits,
- Fire and Emergency alarms.

C. Emergency Response for Significant Impacts

Review identified significant impacts and make sure current emergency procedures are adequate for these areas. If inadequate, develop or revise Emergency Preparedness and Response plans.

D. Central Emergency Response Plan

Create a standard Emergency Response plan for the facility. Identify a Central Emergency Response Coordinator. The attached schematic outlines the general response procedure in the event of a spill, accident, fire, etc. Regulatory requirements for spill and emergency response plans should be included and referenced in this Plan. External emergency responders are to be identified and clearly listed as part of the plan. It is the responsibility of the Central Emergency Response Coordinator to make sure that external emergency responders are aware of potential hazards at the facility and are capable of handling specified emergencies.

The Central Emergency Response Coordinator is solely responsible for contracting external responders, and for creating and filing spill, accident, fire, etc. reporting that is required by regulatory agencies and for the EMS.

E. Incident Review

Spills, accidents and emergencies are to be reviewed for appropriate response and for prevention of reoccurrence. Inadequate emergency plans are to be revised upon review.

F. Practice and Training for Emergency Response

Training necessary for emergency response is to be identified and become part of the training and tracking system for all employees. Emergency and evaluation plans are to be practiced on an annual basis where practical.

V. **Records**

A list of emergency preparedness and response plans for the EMS will be kept and updated as necessary for reference.

A list of all emergency response equipment and locations will be kept and updated as necessary for reference.

VI. Updates and Reviews

Emergency preparedness and response practices will be reviewed and updated annually, after emergencies, or upon the addition of new environmental/legal requirements, and process changes.

VII. Responsibilities

Updating and removal of emergency preparedness and response procedures must be coordinated and approved by the EMS Manager and the Central Emergency Response Coordinator.

VIII. Related Documentation

A list of EMS Emergency Preparedness and Response procedures will be maintained on file by the EMS manager.

Maps and emergency phone numbers are to be posted in designed locations.

Written by: Vince Ray

Date: August 27, 1999

Reviewed by: Chris Joseph

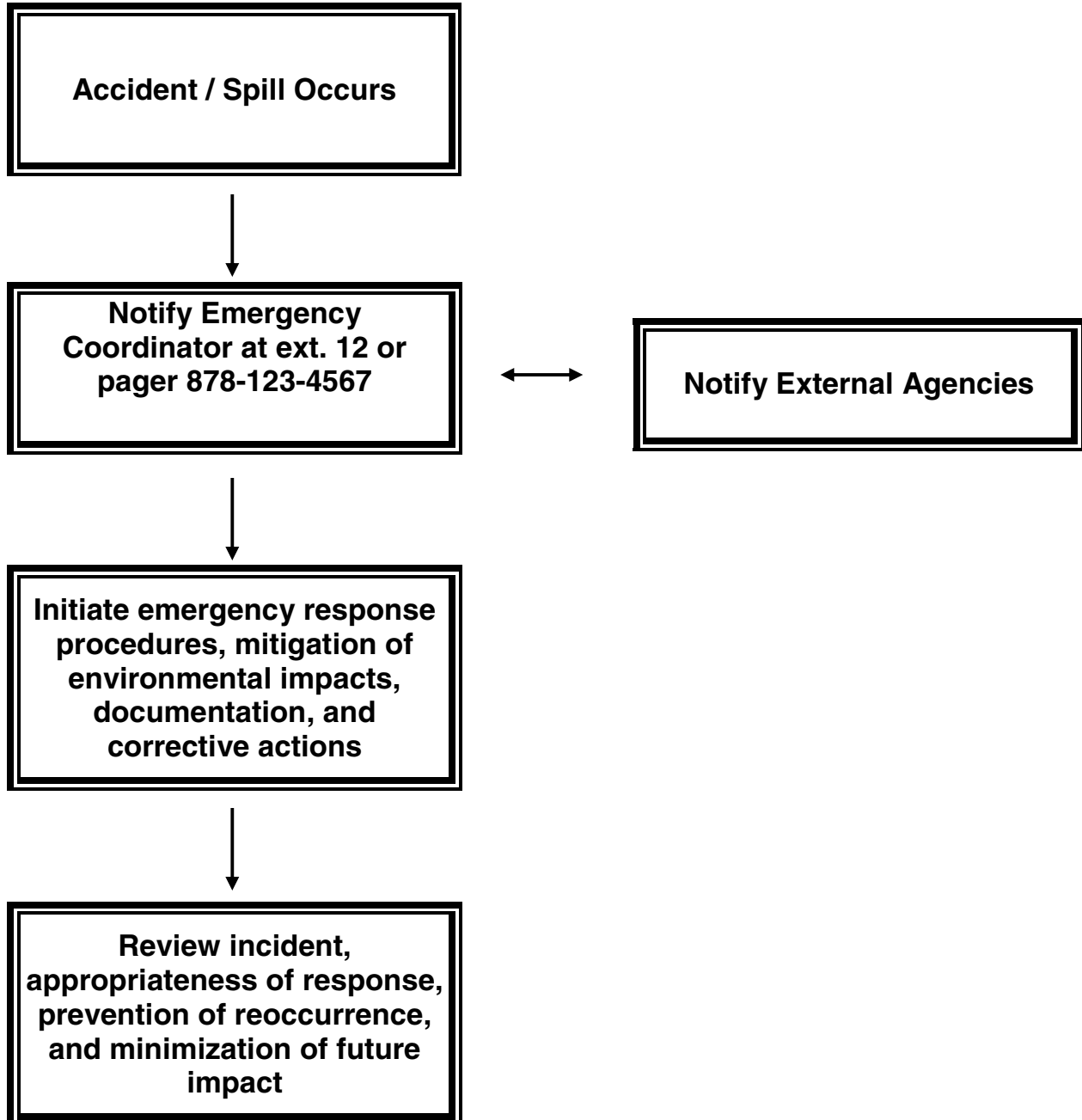
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Joseph's Forklift and Hauling Company

EMS Emergency Preparedness and Response Chain



DENSO MFG. MICHIGAN, Inc. One Denso Rd., Battle Creek, MI		Standard Reference: ISO 14001(96)		Environmental Manual Emergency Preparedness and Response		Page 1
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1.1 PURPOSE

This procedure provides a reference to existing emergency response procedures and plans.

1.2 SCOPE

This procedure applies to all departments and activities at DMMI.

1.3 RESPONSIBILITY

The President holds the responsibility for ensuring emergency procedures are in place to prevent industrial emergencies and minimize their effect if they occur. The Safety Department is responsible for developing, maintaining, and implementing emergency response programs.

All associates are responsible for understanding and following the company's emergency response procedures. All managers are responsible for ensuring that associates follow emergency procedures.

1.4 ACTIONS AND METHODS

1.4.1 DENSO Safety Manual

The DENSO Safety Manual serves as the primary document for the reference of Safety policies and procedures. The Safety Department is responsible for the development of such policies and procedures. All managers are responsible for ensuring that all associates follow such policies and procedures. Materials contained within the manual include procedures for associate safety and well-being, accident prevention, emergency response, and site security.

1.4.2 Emergency Response Plan

DMMI has an Emergency Response Plan which defines the procedures that are to be taken in the event of an emergency. The Safety Department is responsible for the development and implementation of this plan. Responsibilities for internal and external communications are provided in Procedure #EN-EM-443-01, Communication.

1.4.3 Emergency Response Team

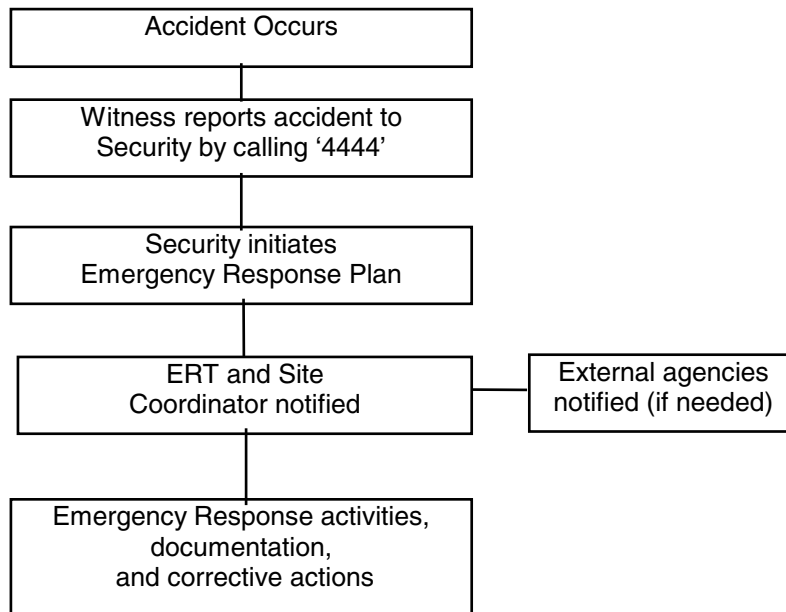
As a function of the Emergency Response plan, DMMI has an on-site Emergency Response Team (ERT). The ERT serves as the first responders in the event of an on-site emergency. The purpose of the ERT is to provide associate safety, minimize damage, and prevent and mitigate environmental impacts associated with emergency situations. Policies and guidelines for ERT members are given in the DENSO Emergency Response Team Handbook. The Safety Department is responsible for ensuring that procedures exist for incident reporting and review, equipment management, and periodic drills.

1.4.4 Generalized Emergency Procedure

* Denotes change in procedure

DENSO MFG. MICHIGAN, Inc. One Denso Rd., Battle Creek, MI		Standard Reference: ISO 14001(96)		Environmental Manual Emergency Preparedness and Response		Page 2
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The flow chart below contains DMMI's generalized emergency response procedure:



1.5 REFERENCES

Procedure #EN-EM-443-02, Communication
 Procedure #EN-EM-453-01, Records
 DENSO Safety Department Manual Policies and Guidelines
 DENSO Emergency Response Plan
 DENSO Emergency Response Team Handbook
 DENSO Crisis Communications Management Plan

1.6 RECORDS

Records produced from this procedure are handled per Records Procedure #EN-EM-453-01.

END

EM447-01.doc



6.4 Emergency Preparedness and Response Completion Checklist

Check Box

- 1. Have you identified your emergency preparedness and response requirements?
- 2. Have you designated a Central Emergency Response Coordinator?
- 3. Have you developed your emergency response plans?
- 4. Do you have the necessary emergency response equipment onsite and do your employees know how to use it?
- 5. Have you written a procedure for Emergency Preparedness and Response for your EMS?
- 6. Have you included in your procedure an incident review plan?

