

# Emergency Planning & Response

Common Issues Found During Three Year Compliance Audits



The Emergency Planning and Response element is designed to help facilities pre-plan for workplace emergencies. In general, this element requires facilities to develop emergency procedures and to train employees in their roles and responsibilities for implementing those procedures.

**According to OSHA, "Well developed emergency plans and proper training (such that employees understand their roles and responsibilities within the plan) will result in fewer and less severe employee injuries and less structural damage to the facility during emergencies. A poorly prepared plan, likely will lead to a disorganized evacuation or emergency response, resulting in confusion, injury, and property damage."**

The following is a list of items that are commonly not implemented, are lacking, or not documented when it comes to the Emergency Planning and Response element:

## **Failure to maintain current contact information**

EAPs and ERPs typically include contact information for internal personnel and external agencies that need to be notified in the event of an emergency. All contact information listed within the plan must be maintained current and accurate, as incorrect information can cause delays in communicating emergencies to pertinent agencies and personnel. An annual review of all contact information is recommended. Reviews should also occur if there are changes in facility personnel.

## **Failure to train employees in their EAP/ERP responsibilities**

### Non-Responding Facilities

All employees should receive training in:

- The overall plan and their responsibilities/roles within it.
- Who to notify if there is an emergency.
- Employee alarm system.
- Evacuation routes, location of assembly areas, and drills.
- Duties if operating critical equipment.
- Where to gain more information on the plan.

### Responding Facilities

In addition to the training that all employees must receive under the EAP, Emergency Response Team (ERT) members must also receive:

- Necessary HAZWOPER training based upon response level, including PPE training.
- Training on the Incident Command System.
- Response drills.

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## **Failure to coordinate with emergency responders**

Coordinating emergency activities with offsite emergency responders is critical, regardless of the response level. Coordination helps ensure that both the facility and offsite responders have the necessary information, tools, and resources to handle an onsite emergency. It also allows the facility and the responder to have a mutual understanding of actions to take place in the event of an emergency. Coordination activities should include a discussion of the following:

- Facility capabilities vs. response agency capabilities.
- Expectations during an emergency.
- Facility-specific information such as facility operations, facility layout, the regulated chemical used onsite and the covered process, etc.
- Information about the responding agency (their contact information, responding personnel, how they operate, resources they can provide, etc.).

Additionally, it is important to coordinate with the SERC and LEPC. This typically occurs as part of the annual Tier II submittal, however depending on the state and region, there can be additional requirements.

## **Failure to conduct drills**

Conducting drills (response and/or evacuation) on a regular basis is important to ensure that employees know their roles / responsibilities and the actions they need to take in the event of an emergency. Drills also allow management to evaluate the effectiveness of their EAP/ERP and to identify areas where improvement can be made.

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