

Emergency Spill Response (ESR) 2

Steps in Spill Response: Nail the planning and training requirements

This is part three in a series addressing various steps involved in responding to spills. Remaining topics include spill response techniques, decontamination of workers and equipment, and reporting requirements.

Planning for safety

Under the Hazardous Waste Operations and Emergency Response (HAZWOPER) standard, the Occupational Safety and Health Administration (OSHA) require written plans that, “address the tasks and objectives of the site operations and the logistics and resources required to reach those tasks and objectives.”

When writing an emergency response plan, identify spill-prone areas in your facility and customize a plan of action for each, based on the volume or nature of the chemicals stored there. Response to a 1 oz. laboratory spill will be much different from response to a break in the main feed line supplying a flammable material to a processing area.

Documenting possible scenarios and detailing the steps for effective response is a key to thorough planning, because it helps identify what resources are necessary. The time to find out you need a backhoe to create an earthen dam is not when the bottom fill valve of a tanker truck fails during offloading a bulk shipment.

Plans should also detail employee responsibilities. Rather than write particular names into the plan, it may be better to categorize employees – for example, “office staff,” “press operators”, etc. – so that you can facilitate training by employee type and not have to alter your plan every time someone changes positions or leaves your company.

Levels of training

With plans in place, facility safety coordinators can determine the levels of training needed. It may not be practical or necessary to train everyone to a technician or specialist level.

Before planning levels of training, consider this: The HAZWOPER standard does allow the option to train all employees to evacuate the facility in the event of a spill and use outside resources for response and clean up. A choice for this option must be well documented and should identify the outside resources, with contact information including phone numbers. It is also a good idea to have a letter or other documentation from the outside resource(s) stating their commitment and detailing their services.

When employees will handle emergency releases, OSHA requires the following levels of training, depending on the extent to which the employee will be involved with the response operation:

- **First responder awareness level:** This level of training is a “baseline” training appropriate for anyone likely to encounter a hazardous materials spill at your facility. These employees need to know the dangers of chemicals stored at the facility, as well as who to contact so that those who have received more in-depth training can initiate the proper response.
- **First responder operations level:** In addition to recognizing a spill and notifying others, employees trained to operations level can initiate basic spill control, containment or confinement measures, but will not actually be involved with stopping the flow of a release or with spill cleanup measures. These employees can also implement decontamination procedures.
- **Hazardous materials technicians:** Have the skills of both awareness and operations level employees. They are also trained to safely respond to spill situations by stopping the flow of a spill and actually cleaning up any spilled materials. These employees receive a more in-depth training on chemical safety and selection of personal protective equipment, and are trained on how to function within the incident command system.
- **Hazardous materials specialists:** Are employees who have specialized knowledge on certain hazardous materials. They support response technicians and act as a liaison with governing agencies. Knowledge of local and state emergency response plans is also an essential part of their training.
- **On-scene incident commanders:** Are trained to “assume control of the incident scene.” They must be able to implement the emergency response plan and know the risks involved with the chemicals spilled. Training also includes knowledge of state and regional response plans and teams.

It’s unlikely that a front office receptionist will need to leave her post to respond to a holding tank spill in the storage yard. However, she may be part of the response plan if she has such duties as making an announcement for others to evacuate or securing the perimeter of the facility by closing gates. Thorough plans help everyone know what is expected in an emergency, and training helps ensure that plans will run smoothly when and if they are ever needed.

To help facilities with guidance on this standard, OSHA has published an informal booklet that discusses the steps that employers must take to protect their employees during response operations. OSHA has also issued many interpretation letters on the HAZWOPER standard.