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| Process Safety Management Program |
| **Title:** Compliance Guidelines for Emergency Preparedness  **Document #:** PSM-SY-UN-019 **Issued:** 09/24/2014 |
| **Responsible Dept.:** EHS **Version:** New  **Approved By:** PSM Focus Group **Page:** 1 of 2 |

**1.0 Purpose:** This document summarizes the method The Pennsylvania State University uses to comply with the requirements relating to the Emergency Preparedness Element of the Process Safety Management (PSM) Program.

**2.0 Scope:** The intent of this element is to outline the requirements associated with potential emergency response situations such as fire, explosion, or highly hazardous chemical / biological releases that may occur within PSM covered processes. There are two main components to the Emergency Preparedness element, Emergency Action Plan and Off-Site Consequence Analysis. For each covered process that involves a highly hazardous chemical, the off-site consequences will define the worst-case and alternate release scenarios.

**3.0 Guidelines:** The University has long established Emergency Preparedness programs and response plans including a certified Hazardous Materials Response Team (Hazmat Team). Through this established framework, the EHS Department is responsible for ensuring the development of facility-specific emergency response plans that encompass the prevention of fires, explosions, hazardous materials releases and appropriate response actions.

Although the Emergency Preparedness Element is functionally managed based on existing University emergency response plans, it is recognized that the associated plans will at a minimum contain the following elements:

1. A written plan has been developed for the covered process areas, available at the facility and affected employees are aware of their responsibilities
2. Written plans will include procedures for reporting emergencies, appropriate evacuation routes, accountability methods and communication methods for affected groups including local emergency response agencies, public and state/federal agencies
3. Procedures and measures for emergency response after an accidental release
4. Location of appropriate documentation for proper first-aid and emergency medical treatment necessary to treat accidental human exposures
5. Emergency response equipment is identified and maintained accordingly for use in response scenarios
6. Training on relevant procedures conducted for all affected employees

The appropriate plans covered by the Emergency Preparedness element will be reviewed and updated according to established review cycles. In addition, certain aspects of the response plans will be tested and exercised according to existing schedules.

The Process Safety Program Manager (PSPM) will maintain oversight of the requirements within this element and ensure appropriate measures are in-place within the covered process areas. In addition, the PSPM will periodically audit facility compliance to the requirements within this element including testing and exercising response plans.

**4.0 Definitions:** The following definitions provide guidance regarding common issues surrounding the Emergency Preparedness Element.

*Covered Process* - any process where a highly hazardous chemical / biological agent or extremely hazardous substance deemed by Penn State is used, handled or stored. This also includes critical process operations identified by the University that would benefit from PSM program implementation.

*Emergency Actions –* actions taken to address equipment or process issues immediately to mitigate an imminent failure that could lead to a health, safety or environmental event. Emergency actions may be taken by various individuals including but not limited to employees, building/operations personnel, and first responders*.*

*Emergency Action Plan –* thewritten document required by OSHA regulations, 29CFR1910.38.

*Emergency Response -* means a response effort by employees from outside the immediate release area or by other designated responders (i.e., mutual aid groups, local fire departments, etc.) to an occurrence which results, or is likely to result, in an uncontrolled release of a hazardous substance.

*Incidental Release* - a release of a hazardous substance which does not pose a significant safety or health hazard to employees in the immediate vicinity or to the employees cleaning it up, nor does it have the potential to become an emergency within a short time frame

*Off-Site Consequence Analysis* – assessment of potential off-site consequences of an accidental chemical / biological release consisting of two components, worst-case release scenario and alternate release scenarios.

*Training -* a process by which someone is taught the skills that are needed for a task, function or specific job.

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| Process Safety Management Program |
| **Title:** Emergency Preparedness Procedure  **Document #:** PSM-SOP-UN-011 **Issued:** 11/26/2014 |
| **Responsible Dept.:** EHS **Version:** New  **Approved By:** PSM Focus Group **Page:** 1 of 5 |

**1.0 Purpose:** This document is intended to guide employees of The Pennsylvania State University (Penn State) in the requirements of Emergency Preparedness within the Process Safety Management (PSM) Program. This procedure supplements the existing University emergency response plans associated with covered process areas.

**2.0 Scope:** This element covers emergency response situations such as fire, explosion, or highly hazardous chemical / biological releases that may occur within a PSM covered process area. The element consists of two components, Emergency Action Plan and Offsite Consequence Analysis. For each covered process area defined within the PSM program, the off-site consequences will outline the worst-case and alternate release scenarios.

**3.0 Responsibility:** The following employees have specific responsibilities assigned to them in accordance with the requirements of Emergency Preparedness within the PSM Program. Specific Budget Executives and Budget Administrators may assign these responsibilities to a Department or individual other than the one identified in this procedure as appropriate.

Budget Executives and Budget Administrators:

1. Assume primary responsibility to maintain a safe work environment within their jurisdiction, by monitoring and exercising control over their assigned areas.
2. Assign a representative from their respective academic or administrative unit to ensure compliance with this procedure.
3. Identify appropriate processes to EHS Department for inclusion in the University’s Environmental Emergency Plans.
4. Ensure appropriate mechanisms exist to develop, update and as appropriate practice emergency preparedness procedures within the academic departments or administrative units for which they are responsible.

EHS Department:

1. Provide guidance on implementation of the University’s Environmental Emergency Plans
2. Define and assign appropriate resources to implement the measures described within the plans.

Physical Plant Supervisors:

1. Ensure employees within their area(s) of responsibility are aware and understand their responsibilities outlined within the emergency preparedness procedures.
2. Provide appropriate opportunities for employees to actively participate in emergency planning and response exercises.
3. Take prompt corrective action when unsafe process safety conditions or practices are observed or reported.

Operations/Facility Manager:

1. Ensure employees within their area(s) of responsibility are aware and understand their responsibilities outlined within the emergency preparedness procedures.
2. Provide appropriate opportunities for employees to actively participate in emergency planning and response exercises.
3. Ensure existing emergency preparedness procedures are reviewed annually and updated accordingly.
4. Immediately report releases as required by University procedure.
5. Take prompt corrective action when unsafe process safety conditions or practices are observed or reported.

Safety Officer:

1. Ensure Emergency Evacuation plans are reviewed annually and updated as required
2. Document that evacuation plans have been updated and are in compliance with applicable requirements.
3. Appoint Building / Department Emergency Coordinators in coordination with Administrative Unit Leaders.
4. Designate Safety Monitors in coordination with Building / Department Emergency Coordinators.

Building / Department Emergency Coordinator:

1. In conjunction with the unit Safety Officer, designate Safety Monitors and alternate Safety Monitors for specific work areas in the facility.
2. Oversee the development, communication, implementation and maintenance of the Emergency Evacuation Plan.
3. Ensure that floor plans and route evacuation maps are posted.
4. Ensure the training of building occupants, Safety Monitors, and Critical Operations Personnel, and notify all personnel of changes to the evacuation plan.
5. Maintain up to date lists of building occupants for each Safety Monitor’s area of coverage, Critical Operations Personnel, Listing of Individuals requiring evacuation assistance and any other personnel with assigned duties under this plan
6. In the event of a fire or other emergency, relay applicable information to emergency personnel, occupants and Safety Monitors.

Process Safety Program Manager – EHS Department:

1. Oversee all aspects of the University’s Process Safety Emergency Preparedness program.
2. Assist EHS Department personnel with preparation and update emergency preparedness plans.
3. Coordinate auditing of Emergency Preparedness for PSM covered processes.

Employees:

1. Understand their requirements and responsibilities outlined within the emergency preparedness procedures.
2. Immediately report releases as required by University procedure.
3. Report Process Safety issues to appropriate line management and/or Process Safety Program Manager that may help eliminate or mitigate the consequences of a catastrophic release in a covered process area.

**4.0 Definitions:**

*Covered Process* - any process where a highly hazardous chemical / biological agent or extremely hazardous substance deemed by Penn State is used, handled or stored. This also includes critical process operations identified by the University that would benefit from PSM program implementation.

*Emergency Actions –* actions taken to address equipment or process issues immediately to mitigate an imminent failure that could lead to a health, safety or environmental event. Emergency actions may be taken by various individuals including but not limited to employees, building/operations personnel, and first responders*.*

*Emergency Action Plan –* thewritten document required by OSHA regulations, 29CFR1910.38.

*Emergency Response -* means a response effort by employees from outside the immediate release area or by other designated responders (i.e., mutual aid groups, local fire departments, etc.) to an occurrence which results, or is likely to result, in an uncontrolled release of a hazardous substance.

*Incidental Release* - a release of a hazardous substance which does not pose a significant safety or health hazard to employees in the immediate vicinity or to the employees cleaning it up, nor does it have the potential to become an emergency within a short time frame

*Offsite –* means areas beyond the property boundary of the stationary source, and areas within the property boundary to which the public has routine and unrestricted access during or outside business hours.

*Off-Site Consequence Analysis* – assessment of potential off-site consequences of an accidental chemical / biological release consisting of two components, worst-case release scenario and alternate release scenarios.

*Operations/Facility Manager* – a person who has control / oversight of building use, stewardship, operation, repair, and general administration of campus facilities. Also includes the operational responsibility of a specific unit operation within a facility.

*Physical Plant Supervisors* – group of individuals in first-line management who monitors and regulates employees in their performance of assigned or delegated tasks (e.g. trains, evaluates, hires, and discipline employees; approves time & attendance; administers the University / Teamster contract, manages absences; plans & rotates overtime work, etc.).

**5.0 Procedure:** Penn State has established a variety of Emergency Preparedness programs for ensuring the development of facility-specific plans that encompass the prevention of fires, explosions, hazardous material releases and appropriate response actions. The following steps outline the requirements relating to Emergency Preparedness within the PSM program.

1. Penn State is committed to preventing discharges of hazardous materials to soil, air, and water and to maintaining the highest standards for spill/release prevention. Specific plans have been developed to describe measures to prevent spills and releases from occurring and to prepare for an effective, safe, and timely response to mitigate the impacts of a release. In addition, other emergencies may require employees to perform specific actions both for their own personal safety and to prevent / minimize the consequences of those emergencies. Plans have also been developed to assist in preplanning for these emergencies and to provide specific procedures in the event an emergency occurs.
2. These plans meet regulatory requirements and serve as a reference for hazardous material storage requirements, as a tool to communicate practices on preventing and responding to spills/discharges or other emergencies with employees, as a guide for inspections, and as a resource during emergency response.
3. The requirements of the Emergency Preparedness element within the PSM Program are outlined within the University’s existing Environmental Hazards Emergency Response Plans and Critical Incident Plans. Although this elements requirements are managed through existing University programs, it is recognized that the applicable plans will at a minimum contain the following requirements:
   1. A written plan for the covered process areas is available at the facility and affected employees are aware of their responsibilities
   2. Written plans include procedures for reporting emergencies, appropriate evacuation routes, accountability methods and communication methods for affected groups including local emergency response agencies, public and state/federal agencies
   3. Procedures and measures for emergency response after an accidental release
   4. Location of appropriate documentation for proper first-aid and emergency medical treatment necessary to treat accidental human exposures
   5. Emergency response equipment is identified and maintained accordingly for use in response scenarios
   6. Training on relevant procedures is conducted for all affected employees
4. In addition to the requirements in the Environmental Hazards Emergency Response Plans and Critical Incident Plans, certain aspects of the covered process area plans will be tested periodically but at least once every three (3) years. The method to test the plans will be dependent on the specific operation but can include, discussion based or operational based exercises. Exercises can include representatives from the building and/or on/off-site first responders.
5. The designated individuals responsible to review and update these plans are defined within the existing Environmental Hazards Emergency Response Plans and Critical Incident Plans. The updates should include a review of past incidents, countermeasures utilized and their effectiveness in addition to any facility modifications.
6. Proposed modifications to approved response plans that impact the covered process area are required to go through the Management of Change (MOC) program requirements (#14). In addition, certain modifications managed within the MOC element may require revisions to the Emergency Action Plan or Offsite Consequence Analysis.
7. The Process Safety Program Manager (PSPM) will maintain oversight of the requirements within this element and ensure appropriate measures are in place within the covered process areas. In addition, the PSPM will periodically audit facility compliance to the requirements within this element including testing and exercising response plans.

**6.0 Attachments**

* 1. N/A