

## **Appendix 5F**

### **HAZWOPER Emergency Response Regulatory Requirements**

**Table 5F-1. HAZWOPER Emergency Response Regulatory Requirements**

Regulatory Requirement	Longhorn ER Document Cross Reference	Comments on Compliance Status
<p>1910.120(q) Emergency response program to hazardous substance releases.</p> <p>(1) Emergency response plan. An emergency response plan shall be developed and implemented to handle anticipated emergencies prior to the commencement of emergency response operations. The plan shall be in writing and available for inspection and copying by employees, their representatives, and OSHA personnel.</p>	<p>Longhorn Facility Response Plan (FRP) Williams System of Operating Manuals, Volume: Emergency Response Plan (ERP)</p>	<p>In compliance</p>
<p>(2) Elements of an emergency response plan. The employer shall develop an emergency response plan for emergencies which shall address, as a minimum, the following areas to the extent that they are not addressed in any specific program required in this paragraph:</p> <p>(i) Pre-emergency planning and coordination with outside parties.</p>	<p>FRP ERP</p>	<p>In compliance</p>
<p>(ii) Personnel roles, lines of authority, training, and communication.</p>	<p>FRP Vol. I, Sec. 2, 5, &amp; 6 ERP pages 26-55</p>	<p>In compliance</p>
<p>(iii) Emergency recognition and prevention.</p>	<p>FRP Vol. I, Sec. 3.1</p>	<p>In compliance</p>
<p>(iv) Safe distances and places of refuge.</p>	<p>FRP Vol. I, Sec. 3.3.7; ERP pages 19-21</p>	<p>In compliance</p>
<p>(v) Site security and control.</p>	<p>FRP Vol. I, Sec. 3.3.7; ERP page 13</p>	<p>In compliance</p>
<p>(vi) Evacuation routes and procedures.</p>	<p>FRP Vol. I, Sec. 3.3.7; ERP pages 14, 20-21</p>	<p>In compliance</p>
<p>(vii) Decontamination.</p>	<p>ERP pages 19, 37, 42</p>	<p>In compliance</p>
<p>(viii) Emergency medication treatment and first aid.</p>	<p>ERP pages 48-49</p>	<p>In compliance</p>
<p>(ix) Emergency alerting and response procedures.</p>	<p>FRP Vol. I, Sec. 3.1 and 3.2; ERP page 15</p>	<p>In compliance</p>
<p>(x) Critique of response and follow-up.</p>	<p>FRP Vol. I, Sec. 3.9; ERP ICS duties</p>	<p>In compliance</p>
<p>(xi) PPE (personal protective equipment) and emergency equipment.</p>	<p>FRP Vol. I, Sec. 3.3.3; ERP pages 21-24</p>	<p>In compliance</p>
<p>(3) Procedures for handling emergency response</p> <p>(i) The senior emergency response official responding to an emergency shall become the individual in charge of a site-specific Incident Command System (ICS).</p>	<p>FRP Vol. I, Sec. 2.3; ERP pages 27-28</p>	<p>In compliance</p>
<p>(ii) The individual in charge of the ICS shall identify, to the extent possible, all hazardous substances or conditions present and shall address as appropriate site analysis, use of engineering controls, maximum exposure limits, hazardous substance handling procedures, and use of any new technologies.</p>	<p>ERP pages 27-28 FRP Vol. II, Sec. 4 Initial Response Actions Checklist</p>	<p>In compliance</p>
<p>(iii) Based on the hazardous substances and/or conditions present, the individual in charge of the ICS shall implement appropriate emergency operations, and assure that the PPE worn is appropriate for the hazards to be encountered.</p>	<p>FRP Vol. I, Sec. 3.3.3; ERP pages 21-24, 27-28</p>	<p>In compliance</p>
<p>(iv) Employees engaged in emergency response and exposed to hazardous substances presenting an inhalation hazard or potential inhalation hazard shall wear positive pressure self-contained breathing apparatus while engaged in emergency response, until such time that the individual in charge of the ICS determines through the use of air monitoring that a decreased level of respiratory protection will not result in hazardous exposures to employees.</p>	<p>ERP pages 21-22, 28, 32</p>	<p>In compliance</p>

**Table 5F-1. (Continued)**

<b>Regulatory Requirement</b>	<b>Longhorn ER Document Cross Reference</b>	<b>Comments on Compliance Status</b>
(v) The individual in charge of the ICS shall limit the number of emergency response personnel at the emergency site, in those areas of potential or actual exposure to incident or site hazards, to those who are actively performing emergency operations. However, operations in hazardous areas shall be performed using the buddy system in groups of two or more.	ERP pages 14, 19	In compliance
(vi) Back-up personnel shall be standing by with equipment ready to provide assistance or rescue. Qualified basic life support personnel, as a minimum, shall also be standing by with medical equipment and transportation capability.	ERP page 19	In compliance
(vii) The individual in charge of the ICS shall designate a safety officer, who is knowledgeable in the operations being implemented at the emergency response site, with specific responsibility to identify and evaluate hazards and to provide direction with respect to the safety of operations for the emergency at hand.	FRP Vol. I, Sec. 3.3.3; ERP pages 32-33	In compliance
(viii) When activities are judged by the safety officer to be an IDLH and/or to involve an imminent danger condition, the safety officer shall have the authority to alter, suspend, or terminate those activities. The safety official shall immediately inform the individual in charge of the ICS of any actions needed to be taken to correct these hazards at the emergency scene.	ERP pages 32-33	Safety Officer responsibilities do not specifically state authority to stop or change work when facing imminent danger or IDLH.
(ix) After emergency operations have terminated, the individual in charge of the ICS shall implement appropriate decontamination procedures.	ERP pages 19, 37, 42	Responsibilities of Repair and Environmental Group Leaders include decontamination, but no specific procedures are given.
(x) When deemed necessary for meeting the tasks at hand, approved self-contained compressed air breathing apparatus may be used with approved cylinders from other approved self-contained compressed air breathing apparatus provided that such cylinders are of the same capacity and pressure rating. All compressed air cylinders used with self-contained breathing apparatus shall meet US.Department of Transportation and National Institute for Occupational Safety and Health criteria.	Not addressed in plan.	SCBA addressed in Safety Manual, SA-6.iii and SA-6.43
(4) Skilled support personnel. Personnel, not necessarily an employer’s own employees, who are skilled in the operation of certain equipment, such as mechanized earth moving or digging equipment or crane and hoisting equipment, and who are needed temporarily to perform immediate emergency support work that cannot reasonably be performed in a timely fashion by an employer’s own employees, and who will be or may be exposed to the hazards at an emergency response scene, are not required to meet the training required in this paragraph for the employer’s regular employees. However, these personnel shall be given an initial briefing at the site prior to their participation in any emergency response. The initial briefing shall include instruction in the wearing of appropriate PPE, what chemical hazards are involved, and what duties are to be performed. All other appropriate safety and health precautions provided to the employer’s own employees shall be used to assure the safety and health of these personnel.	FRP Vol. I, Sec. 6.2.1	In compliance
(5) Specialist employees. Employees who, in the course of their regular job duties, work with and are trained in the hazards of specific hazardous substances, and who will be called upon to provide technical advice or assistance at a hazardous substance release incident to the individual in charge, shall	FRP Vol. I, Sec. 6.3	In compliance

**Table 5F-1. (Continued)**

<b>Regulatory Requirement</b>	<b>Longhorn ER Document Cross Reference</b>	<b>Comments on Compliance Status</b>
receive training or demonstrate competency in the area of their specialization annually.		
(6) Training. Training shall be based on the duties and function to be performed by each responder of an emergency response organization. The skill and knowledge levels required for all new responders, those hired after the effective date of this standard, shall be conveyed to them through training before they are permitted to take part in actual emergency operations on an incident. Employees who participate, or are expected to participate, in emergency response, shall be given training in accordance with the following paragraphs:	FRP Vol. I, Sec. 6.3	In compliance
(i) First responder awareness level. First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the authorities of the release. First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas: (A) An understanding of what hazardous substances are, and the risks associated with them in an incident.	FRP Vol. I, Sec. 6.3 ERP page 13	In compliance
(B) An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.	FRP Vol. I, Sec. 6.3	In compliance
(C) The ability to recognize the presence of hazardous substances in an emergency.	FRP Vol. I, Sec. 6.3	In compliance
(D) The ability to identify the hazardous substances, if possible.	FRP Vol. I, Sec. 6.3	In compliance
(E) An understanding of the role of the first responder awareness individual in the employer's emergency response plan including site security and control and the US. Department of Transportation's Emergency Response Guidebook.	FRP Vol. I, Sec. 6.3	In compliance
(F) The ability to realize the need for additional resources, and to make appropriate notifications to the communication center.	FRP Vol. I, Sec. 6.3	In compliance
(ii) First responder operations level. First responders at the operational level shall have received at least eight hours of training or have had sufficient experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level and the employer shall so certify: (A) Knowledge of the basic hazard and risk assessment techniques.	FRP Vol. I, Sec. 6.3 ERP page 27	In compliance
(B) Know how to select and use proper PPE provided to the first responder operational level.	FRP Vol. I, Sec. 6.3	In compliance
(C) An understanding of basic hazardous materials terms.	FRP Vol. I, Sec. 6.3	In compliance
(D) Know how to perform basic control, containment and/or confinement operations within capabilities of the resources and PPE available with their unit.	FRP Vol. I, Sec. 6.3	In compliance
(E) Know how to implement basic decontamination procedures.	Explicit discussion not found	Explicit discussion not found
(F) An understanding of the relevant standard operating procedures and termination procedures.	FRP Vol. I, Sec. 6.3	In compliance

**Table 5F-1. (Continued)**

<b>Regulatory Requirement</b>	<b>Longhorn ER Document Cross Reference</b>	<b>Comments on Compliance Status</b>
(iii) Hazardous materials technician. Hazardous materials technicians shall have received at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas and the employer shall so certify: (A) Know how to implement the employer’s emergency response plan.	FRP Vol. I, Sec. 6.3	In compliance
(B) Know the classification, identification and verification of known and unknown materials by using field survey instruments and equipment.	FRP Vol. I, Sec. 6.3	In compliance
(C) Be able to function within an assigned role in the Incident Command System.	FRP Vol. I, Sec. 6.3	In compliance
(D) Know how to select and use proper specialized chemical PPE provided to the hazardous materials technician.	FRP Vol. I, Sec. 6.3	In compliance
(E) Understand hazard and risk assessment techniques.	FRP Vol. I, Sec. 6.3	In compliance
(F) Be able to perform advance control, containment, and/or confinement operations within the capabilities of the resources and PPE available with the unit.	FRP Vol. I, Sec. 6.3	In compliance
(G) Understand and implement decontamination procedures.	Not specifically addressed	Not specifically addressed
(H) Understand termination procedures.	FRP Vol. I, Sec. 6.3	In compliance
(I) Understand basic chemical and toxicological terminology and behavior.	FRP Vol. I, Sec. 6.3	In compliance
(iv) Hazardous materials specialist. Hazardous materials specialists shall have competency in the following areas and the employer shall so certify: (A) Know how to implement the local emergency response plan.	FRP Vol. I, Sec. 6.3	In compliance
(B) Understand classification, identification and verification of known and unknown materials by using advanced survey instruments and equipment.	FRP Vol. I, Sec. 6.3	In compliance
(C) Know the state emergency response plan.	FRP Vol. I, Sec. 6.3	In compliance
(D) Be able to select and use proper specialized chemical PPE provided to the hazardous materials specialist.	FRP Vol. I, Sec. 6.3	In compliance
(E) Understand in-depth hazard and risk techniques.	FRP Vol. I, Sec. 6.3	In compliance
(F) Be able to perform specialized control, containment, and/or confinement operations within the capabilities of the resources and PPE available.	FRP Vol. I, Sec. 6.3	In compliance
(G) Be able to determine and implement decontamination procedures.	Not specifically addressed	Not specifically addressed
(H) Have the ability to develop a site safety and control plan.	FRP Vol. I, Sec. 6.3	In compliance
(I) Understand chemical, radiological and toxicological terminology and behavior.	FRP Vol. I, Sec. 6.3	In compliance
(v) On scene incident commander. Incident commanders, who will assume control of the incident scene beyond the first responder awareness level, shall receive at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas and the employer shall so certify: (A) Know and be able to implement the employer’s incident command system.	FRP Vol. I, Sec. 6.3 ERP page 27	In compliance
(B) Know how to implement the employer’s emergency response plan.	FRP Vol. I, Sec. 6.3	In compliance
(C) Know and understand the hazards and risks associated with employees working in chemical protective clothing.	FRP Vol. I, Sec. 6.3	In compliance

**Table 5F-1. (Continued)**

<b>Regulatory Requirement</b>	<b>Longhorn ER Document Cross Reference</b>	<b>Comments on Compliance Status</b>
(D) Know how to implement the local emergency response plan.	FRP Vol. I, Sec. 6.3	In compliance
(E) Know of the state emergency response plan and of the Federal Regional Response Team.	FRP Vol. I, Sec. 6.3	In compliance
(F) Know and understand the importance of decontamination procedures.	FRP Vol. I, Sec. 6.3	In compliance
(7) Trainers. Trainers who teach any of the above training subjects shall have satisfactorily completed a training course for teaching the subjects they are expected to teach, such as the courses offered by the US National Fire Academy, or they shall have the training and/or academic credentials and instructional experience necessary to demonstrate competent instructional skills and a good command of the subject matter of the courses they are to teach.	Not addressed	Not addressed
(8) Refresher training. (i) Those employees who are trained in accordance with paragraph (q)(6) of this section shall receive annual refresher training of sufficient content and duration to maintain their competencies, or shall demonstrate competency in those areas at least yearly.	FRP Vol. I, Sec. 6.2	In compliance
(ii) A statement shall be made of the training or competency, and if a statement of competency is made, the employer shall keep a record of the methodology used to demonstrate competency.	FRP Vol. I, Sec. 6.2	In compliance
(9) Medical surveillance and consultation. (i) Members of an organized and designated HAZMAT team and hazardous materials specialist shall receive a baseline physical examination and be provided with medical surveillance as required in paragraph (f) of this section.	Not addressed	Not addressed
(ii) Any emergency response employees who exhibit signs or symptoms which may have resulted from exposure to hazardous substances during the course of an emergency incident either immediately or subsequently, shall be provided with medical consultations as required in paragraph (f)(3)(ii) of this section.	ERP page 48	In compliance
(10) Chemical protective clothing. Chemical protective clothing and equipment to be used by organized and designated HAZMAT team members, or to be used by hazardous materials specialists, shall meet the requirements of paragraphs (g)(3) through (5) of this section.	FRP Vol. I, Sec. 3.3.3 ERP pages 21-24	In compliance

**Table 5F-1. (Continued)**

<b>Regulatory Requirement</b>	<b>Longhorn ER Document Cross Reference</b>	<b>Comments on Compliance Status</b>
<p>(11) Post-emergency response operations. Upon completion of the emergency response, if it is determined that it is necessary to remove hazardous substances, health hazards and materials contaminated with them (such as contaminated soil or other elements of the natural environment) from the site of the incident, the employer conducting the clean-up shall comply with one of the following:</p> <p>(i) Meet all the requirements of paragraphs (b) through (o) of this section; or</p> <p>(ii) Where the clean-up is done on plant property using plant or workplace employees, such employees shall have completed the training requirements of the following: 29 CFR 1910.38(a); 1910.134; 1910.1200, and other appropriate safety and health training made necessary by the tasks that they are expected to perform such as PPE and decontamination procedures. All equipment to be used in the performance of the clean-up work shall be in serviceable condition and shall have been inspected prior to use.</p>	<p>FRP Vol. I, Sec. 3.9 ERP pages 41-42</p>	<p>In compliance</p>

Note: All references to Volume II (Sugarland Response zone) apply equally to Volume III (Hobbs Response Zone).