

PROGRAM INTRODUCTION

Purpose

The purpose of the introduction is twofold. First, it provides you with the opportunity to become familiar with the facilitator, training facility, sponsoring Chapter, National Safety Council, and colleagues in attendance. You are also introduced to the program goals, learning path, and materials that support this program.

This session also orients you to the fundamentals of emergency planning. After assessing your facility's experience with a wide scope of emergencies, you will review key terms, costs, planning goals, and a 4-step process for planning for and handling emergencies in the workplace based on best practices and OSHA requirements. The 4-step process is used in this program as a planning framework that can lead to implementing an effective emergency plan for your business.

Concepts are reinforced in this step to help ensure application to your business by:

- Reviewing sections of an emergency plan template and identifying resources that will help you in completing an emergency plan for your business.
- Demonstrating an understanding of Step 1 by responding to questions posed at critical decision points in a case study on emergency planning.

Objectives

After completing this module, you will be able to:

- Identify a learning goal/expectation for this program.
- Recognize the course goals, learning path, and structure and purpose of their Participant Guide (including the Tools and Resources section as a source for information, forms, assessments, and checklists for emergency action planning) that support this program.
- Rate your [basic] business readiness in the case of an emergency.
- Recognize the potential impact (benefits) of an effective emergency plan.
- Assess your facility's experience with a wide scope of specific and potential emergencies.
- Recognize, in an orientation to emergency planning:
 - Key terms.
 - Goals for emergency planning.
 - The 4 steps in the process for effective emergency planning.
 - Emergency management, planning elements, and considerations.
 - Cost to develop an emergency plan.
 - OSHA requirements.

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Planning for Emergencies training program.

Small businesses – those with 250 or fewer employees – are a vital component of our economy and provide employment for more than half the workers in United States industry. However, prevention of occupational illness and injury is often challenging in these small businesses because of limited resources. To respond to this challenge and meet your special business needs, the National Safety Council offers a wide array of safety training programs.

By being here, you are making a commitment to learn about emergency planning. You also gain access to resources that are available to small businesses. We are confident that your time and energy investment will be well spent when you apply what you learn in this program to your business.

How to Make the Most of Your Learning Experience

This program is designed to increase your knowledge and improve your skills in planning for emergencies. To make the most of the information, tools, and practice available in this program, you will participate in a variety of activities. These activities include short presentations, discussions, case studies, and practical exercises. You'll also be given a variety of resources that you can use back at your workplace.

Your learning experience will be most effective if you actively participate in all program activities. To be an active participant and make this experience meaningful:

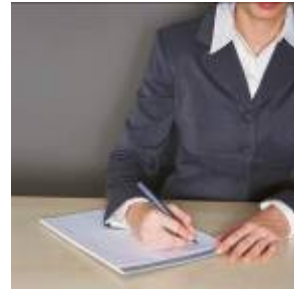
- Take part in program discussions.
- Assess issues at your business that relate to safety communication and training.
- Learn from each other. Stay in touch with other participants. Plan to learn from each other after this program ends.
- Ask questions when you are not clear on any points. The answers may be important later in the program.



Activity: Readiness Assessment

Directions: Think about your business readiness in regards to a potential emergency.

1. Using the Readiness Assessment on the following page, answer the questions (Yes, No, or Unsure) pertaining to your business readiness (level of preparedness) in the case of an emergency/disaster. Use this list as a quick gauge of your current level of preparedness for an emergency.
2. Calculate your results and check the corresponding rating.
3. Share your Readiness Assessment results during introductions.



Activity: Readiness Assessment (continued)

How Prepared Is Your Business for an Emergency?	Yes	No	Unsure
1. Does your business know what kinds of emergencies might affect it – both internally and externally?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Does your business have a written, comprehensive emergency plan in place to help ensure your safety and take care of employees until help can arrive?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Has your business created and practiced procedures to quickly evacuate and find shelter in case of an emergency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Has your business created a communication plan to communicate with employees in an emergency? (Examples include set up a telephone call tree, password-protected page on the company Web site, e-mail alert or call-in voice recording, and a contact list that includes employee emergency contact information.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Has your business talked with utility service providers about potential alternatives and identified back-up options?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Has your business determined operations that need to be up and running first after an emergency and how to resume key operations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Has your business created a list of inventory and equipment, including computer hardware, software, and peripherals (such as backed up/protected records and critical data) for business continuity and insurance purposes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Has your business met with your insurance provider to review current coverage in case of an emergency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Does your business promote family and individual preparedness among co-workers (such as emergency preparedness information during staff meetings, newsletters, company intranet, periodic employee e-mails, and via other internal communication tools)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Have emergency shutdown procedures been developed for equipment such as boilers, automatic feeds or other operations that can not simply be left running in an emergency evacuation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Has your business worked with your community on emergency planning efforts and helped to plan for community recovery?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Readiness Results

Count your number of “Yes” responses to calculate a score. Your score is a **general reflection** of how much you know about emergency planning efforts at your business and/or how prepared your business may be for an emergency.

- If you have 8-11 “Yes” responses, you are well on your way to having a comprehensive and effective plan in place.
- If you have 4-7 “Yes” responses, while some aspects of your plan may be in place, you have some work to do to fill gaps.
- If you have 1-3 “Yes” responses, get started immediately on developing an emergency plan for your business. This training program is a great first step!

Activity: Introductions

Directions: Introduce yourself to your facilitator and other participants. Also, share comments about your business readiness in regards to a potential emergency/disaster.

1. Prepare to introduce yourself by sharing your name, industry/business name, size of your business, and job/type of work.
2. Also, identify the reason(s) you have for attending this training program (your learning goal). Ask yourself, **“What do I want to be able to DO as a result of participating in this program?”** The answer to this question is your reason for attending. Some possible learning goals are provided for you.
3. Briefly introduce yourself by sharing your name, industry/business name, job/type of work, reason for attending the program, and how you scored on the Readiness Assessment.



Participant Introductions

Name:

Industry/Business Name:

Size of Your Business:

Job/Type of Work:

Main Reasons (Learning Goals) for Attending this Training Program

Check all that apply.

- Learn how to create an emergency plan at our business.
- Obtain resources that will help us create an emergency plan for our business
- Protect our employees, customers, and business.
- Evaluate the emergency plan we have in place.
- Learn about what others are doing in their emergency planning efforts.
- List other reasons for being here:

NOTE: Make your introduction brief – just enough information so others can learn a little about you.

Program Goals and Agenda

As a result of completing the **Planning for Emergencies** training program, you will be able to implement an effective emergency action planning process and create a plan for your business.

- Based on best practices and OSHA requirements for emergency action planning, focus on a 4-step process and related elements for handling emergencies in the workplace.
- Address types of emergencies, planning guidelines, and planning priorities such as communications, direction and control, training, medical services, and community outreach.

The 4-step process for effective emergency planning that is the model and program framework for achieving this goal, as well as establishes the overarching learning path for participants, is:

- Step 1: Get Started – Establish a Planning Team
- Step 2: Analyze Capabilities, Risks, and Vulnerabilities
- Step 3: Develop the Plan
- Step 4: Implement the Plan

Training Program Agenda
Program Introduction
Module 1: Get Started – Establish a Planning Team
Module 2: Analyze Capabilities, Risks, and Vulnerabilities
Module 3: Develop the Plan
Module 4: Implement the Plan
Conclusion

Why Are We Here?

? *What would you do if an emergency – earthquake, fire, building/bridge collapsed, or pandemic – happened where you were at 9 AM tomorrow?*

Watch a short video on emergencies as you take a few minutes to consider the answer to this question.

Your answer to the question above is dependant on a number of factors. For example:

- Are you directly impacted by the emergency? Are your loved ones affected by the emergency?
- Are you at work or at home? If you are at home, you might make different choices than it you were at work.
- If you were at work, you might immediately begin performing an emergency function. However, there is also a likelihood that you might leave work and try to find and round up your family and then flee the area, experiencing such things as traffic chaos and clogged communication lines.
- If it was a health emergency, you might head for a hospital, clinic, or doctor's office to get Tamiflu.

The terrorist attacks on September 11, 2001 changed the landscape of United States homeland security forever, creating an unprecedented focus on heightened security and emergency preparedness. This focus is comparable to no other time in American history.

While we all hope that we will not be faced with another 911 – or **any** emergency, the majority of us have come to realize the need to implement emergency plans on a national, state, local/community, and business level. Since emergencies **will** occur, planning is necessary to prevent possible disaster. An urgent need for rapid decisions, shortage of time, and lack of resources and trained personnel can lead to chaos during an emergency. The lack of an emergency plan could lead to severe losses such as multiple casualties and possible financial collapse of an organization.

So, what should you and your business do in case of an emergency?

Activity: Preparing Your Business for Any Emergency

Directions: A comprehensive plan must address any emergency that may be face by a business.

1. Consider the perspective of your business in regard to ANY emergency as you read the questions below.
2. Answer and discuss each question. Take notes in the space provided.
3. Prepare to share your responses with other participants.



? Consider the situations below that may be faced by a business. Place checkmarks next to the threats, criminal acts, emergencies, crises, or disasters that have affected or could affect your business.

- | | |
|---|--|
| <input type="checkbox"/> [Armed] Robbery | <input type="checkbox"/> Hazardous Materials |
| <input type="checkbox"/> Assault and/or Battery | <input type="checkbox"/> Homicide |
| <input type="checkbox"/> Biological Agents | <input type="checkbox"/> Kidnapping (extortion) |
| <input type="checkbox"/> Bombing/Explosion | <input type="checkbox"/> Medical Emergency |
| <input type="checkbox"/> Chemical Agents | <input type="checkbox"/> Nuclear Attack/Radioactive Fall-out (Dirty bomb) |
| <input type="checkbox"/> Civil Unrest/Disturbance | <input type="checkbox"/> Tornado |
| <input type="checkbox"/> Communication Failure | <input type="checkbox"/> Other Natural Disasters (Flood, Hurricane, Landslide, Tsunami, Mudflow, Volcano, Wildland Fire) |
| <input type="checkbox"/> Computer Crime/Data Loss | <input type="checkbox"/> Property Damage |
| <input type="checkbox"/> Drug Dealing | <input type="checkbox"/> Sabotage |
| <input type="checkbox"/> Drunks, Jokesters, Psychopaths, Unruly Customers | <input type="checkbox"/> Shooting |
| <input type="checkbox"/> Earthquake | <input type="checkbox"/> Structural Failure |
| <input type="checkbox"/> Industrial Espionage (Trademarks, Patents, Licensing, Copyright) | <input type="checkbox"/> Terrorism |
| <input type="checkbox"/> Falls | <input type="checkbox"/> Transportation Incident |
| <input type="checkbox"/> Fire | <input type="checkbox"/> Vandalism |
| <input type="checkbox"/> Flood or Flash Flood | <input type="checkbox"/> Workplace Violence |
| <input type="checkbox"/> Forgery/Fraud | |

List other emergencies you can think of that may not be noted in the space below.

? In what area(s) of your business and/or emergency plan do you think you are most vulnerable?

? Do you have a written emergency response plan that takes into account all emergencies? If “yes,” briefly describe it. If “no,” identify a reason why you think it does not exist.

Key Terms & Scope of Workplace Emergencies

Before exploring the major elements and steps for emergency planning, review the basic concepts, terms, and principles related to emergencies in the following charts.

Term	Definition/Description
Threat	The intention to inflict evil, injury, or damage or the warning/fear that something harmful (criminal act/incident) may occur. A threat can be specific; that is, have details related to it such as who, what, when, why, and how. A non-specific threat is general in nature and is not likely to have these details related to it. NOTE: A threat can be prevented from becoming a criminal act (incident).
Criminal Act	An illegal and/or malicious action (crime) that has been intentionally committed.
Emergency	An unforeseen combination of circumstances or the resulting state that calls for immediate/urgent action, assistance, or relief due to injury or death (or the potential for injury or death to any person) or the loss or damage to private, public, or company property.
Crisis	An unstable or crucial time or state of affairs in which a decisive change is impending; especially one with the distinct possibility of a highly undesirable outcome in a situation that has reached a critical phase.
Disaster	A sudden, catastrophic event that results in great damage, loss, or destruction. A disaster may be the result of a natural occurrence or criminal act.
Hazard	Any existing or potential workplace condition that, by itself or by interacting with other variables, can result in death, injury, property damage, or other loss. Hazards: <ul style="list-style-type: none"> ■ Include unsafe conditions, practices, and procedures. ■ Are defined as the potential for harm or damage to people, property, or environment. ■ Include characteristics of objects in the actions or lack of actions by people. ■ May exist with or without the presence of people and land development. Earthquakes, hurricanes, tornadoes, and other geological and meteorological events have been occurring for a very long time and the natural environment adapted to their impacts.
Risk	A measure of the probability and severity of adverse effects. <ul style="list-style-type: none"> ■ Risk depends on 3 factors: hazard, vulnerability, and exposure. ■ Risk is the estimated impact that a hazard would have on people, services, facilities, and structures. It refers to the likelihood of a hazard event resulting in an adverse condition that causes injury or damage.
Vulnerability	The exposure of people, property, industry, resources, ecosystems, or historical buildings and artifacts to risk.
RVA (Risk and Vulnerability Analysis)	A measure of exposure to risk.
Capability	The level of preparedness (ability) to respond to an emergency, including assets/resources, qualifications, capacity, means, and strengths.
Capability Analysis	A systematic review of an organization's ability to respond to an emergency.

Scope of Workplace Emergencies (continued)

In this module, focus is on ANY type of an event that may be positively affected by emergency planning. Some of the most common emergencies that affect businesses are profiled in the following chart.

Type of Emergency	Description
Fire	<p>Common causes of fire in the workplace include electric equipment, arson, smoking, static electricity, welding or other “hot work “ activities like grinding or chipping, or spontaneous combustion from sources like improperly disposed oily rags. Once a fire begins, it will expand quickly – doubling in size in as little as 30 seconds.</p> <ul style="list-style-type: none"> ■ Each year thousands of Americans die in fires. Over two-thirds of the victims die from inhalation of smoke and toxic vapors. ■ Fires also destroy jobs. Approximately 35-45 % of businesses destroyed by fire do not rebuild.
Natural (Weather-Related) Disasters	<p>Severe weather events are often referred to as disasters. Depending on the area of the country, these events may include:</p> <ul style="list-style-type: none"> ■ Tornadoes ■ Flash flooding ■ Snow storms/blizzards ■ Earthquakes ■ Hurricanes ■ Temperature extremes, such as cold waves or heat spells <p>Planning should account for the possibility of infrastructure failings, such as structural collapse in buildings or roads rendered impassable.</p>
Medical Emergencies <ul style="list-style-type: none"> ■ Injury ■ Illness 	<p>Consider medical emergencies from 2 primary perspectives:</p> <ul style="list-style-type: none"> ■ What type of life threatening injury could occur at the workplace? Response to injuries such as severe bleeding, burns, chemical exposure, crushing, or breathing emergencies must be addressed in emergency planning. ■ What type of illnesses can exhibit themselves in the workplace? Planning must address sudden onset of illness such as cardiac arrest, heat stroke, or seizure and issues that include recognizing early symptoms and protecting responders from blood borne pathogens and body fluids.

Scope of Workplace Emergencies (continued)

Type of Emergency	Description
Hazardous Material Emergencies	<p>Consider hazardous material emergencies from 2 primary perspectives:</p> <ul style="list-style-type: none"> ■ What type of chemicals are stored or used onsite may be involved in an emergency? <ul style="list-style-type: none"> – The list of chemicals in your hazard communication plan is a good place to start. MSDSs should be reviewed to see if the product is incompatible with other chemical used in the facility. Even small amounts of a common cleaning chemical improperly mixed can release a significant plume of irritating gases. For example, mixing household bleach with an acid based cleaning compound will result in the release of chlorine gas. – Other departments that often have significant amounts of potentially dangerous chemicals include laboratories and maintenance shops. Any department that uses gas cylinders, such as welding areas or flammable chemicals, should be reviewed. Do not restrict emergency response planning to materials held in large storage tanks. Many emergencies begin with small amounts of chemicals improperly used. ■ What type of chemicals stored offsite may impact your facility? <ul style="list-style-type: none"> – Since the 1990s, facilities that store quantities of specific chemicals above a threshold quantity are required to develop risk management plans. These plans must include a worst-case scenario of chemical release from the facility. Plans are available to a surrounding community and local emergency responders. Contact your local emergency responder to see what chemical releases from surrounding facilities can impact your site.
Workplace Violence/ Intruder	<p>After motor vehicle deaths, homicide was the most common cause of occupational deaths between 1992 and 1999. Most of these homicides were in wholesale and retail trades. Emergency planning should include the possibility of violence in the workplace. The objectives of this planning should address:</p> <ul style="list-style-type: none"> ■ Securing the area as a crime scene (usually done by external resource, but business personnel should know what to do/not to do in this situation) ■ Prevention and mitigation of traumatic stress ■ Intervention to assist in recovery from traumatic stress ■ Acceleration of recovery whenever possible ■ Restoration to work functions ■ Maintenance of worker health and welfare ■ Media coordination and timely dissemination of information in the workplace
Intentional Emergencies or Disasters	<p>Emergency planning should also consider the possibility of man-made disasters such as explosions from a bomb or civil disturbances. Also, the possibility of radiation leakage must be considered if nuclear power plants are in the region. Procedures should also be developed for handling suspicious mail.</p>

Introduction to Emergency Planning

Social and economic costs of emergencies, criminal acts, crises, and disasters can be significantly reduced if families, businesses, and communities take proactive steps to ensure their own safety. Emergency planning is an important part of a comprehensive workplace safety program. An effective response during an emergency depends on the quality of planning and training that occurs before a situation arises.



Goals of Emergency Planning

Your goal in planning is to protect employees and your facility and develop a plan to resume operations if a facility is damaged or destroyed in an emergency. Through effective planning, you can:

- Lessen potential for loss of life and property by anticipating emergencies (minimize the impact of an emergency).
- Protect your employees, customers, and business.
- Assist employees in understanding their responsibilities and those of their co-workers in the event of an emergency.

Management and employees must be committed to and involved in all aspects of a safety program, including emergency planning. The program must be regularly reviewed and updated. Input and support from all employees helps ensure that an effective program is implemented.

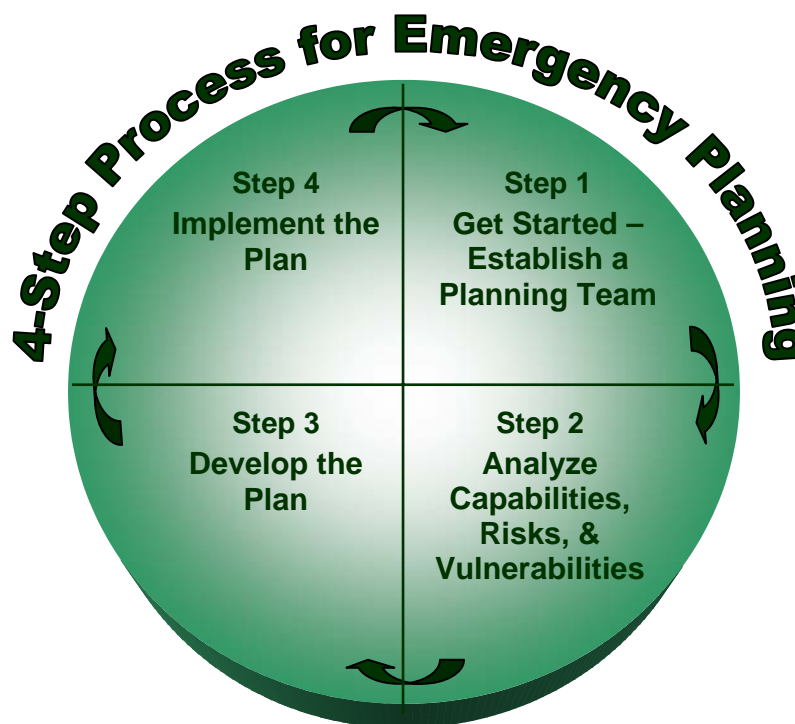
NOTE: For purposes of this training, it is important to note difference between “emergency planning” and “business recovery and restoration planning.” Focus in this course is on emergency planning, as defined above. Emergency planning is different from business recovery and restoration planning in that the goal of recovery and restoration operations is to recover the facility or operation and maintain critical service or product delivery. Recovery and restoration, beyond the scope of this program, includes:

- Re-deploying personnel.
- Deciding whether to repair the facility, relocate to an alternate site, or build a new facility.
- Acquiring additional resources necessary for restoring business operations.
- Re-establishing normal operations.
- Resuming operations at pre-disruption levels.

Introduction to the 4-Step Emergency Planning Process

The 4-step planning process explored in this training program is generally based on the Emergency Management Guide for Business and Industry – A Step-by-Step Approach to Emergency Planning, Response and Recovery for Companies of All Sizes, FEMA 141/October 1993.

NOTE: Obtain the Emergency Management Guide for Business and Industry at <http://www.fema.gov/pdf/library/bizindst.pdf> or in the Tools and Resources section of your Participant Guide.



The process is step-by step advice on how to create and maintain a comprehensive emergency management program. It can be used by manufacturers, corporate offices, retailers, utilities, or any organization where a sizable number of people work or gather. The concepts in this program will apply:

- Whether you operate from a high-rise building or an industrial complex.
- Whether you own, rent or lease your property.
- To companies of all sizes.

Introduction to the 4-Step Emergency Planning Process (continued)

Emergency Management

To begin, you need not have in-depth knowledge of emergency management. What you need is the authority to create a plan and a commitment from the chief executive officer to make emergency management part of your corporate culture. If you already have a plan, use this training program as a resource to assess and update your plan.

Emergency management is a dynamic process. Planning, though critical, is not the only component. Training, conducting drills, testing equipment and coordinating activities with the community are other important functions.

To be successful, emergency management requires upper management support. The chief executive sets the tone by authorizing planning to take place and directing senior management to get involved.

The Case for Emergency Management

When presenting the “case” for emergency management, avoid dwelling on the negative effects of an emergency (such as deaths, fines, criminal prosecution) and emphasize the positive aspects of preparedness. For example, it:

- Helps companies fulfill their moral AND social responsibility to protect employees, the community, and the environment.
- Facilitates compliance with regulatory requirements of Federal, State, and local agencies.
- Enhances a company’s ability to recover from financial losses, regulatory fines, loss of market share, damages to equipment, or products or business interruption.
- Reduces exposure to civil or criminal liability in the event of an incident.
- Enhances a company’s image and credibility with employees, customers, suppliers, and the community.
- May reduce your insurance premiums.

Costs to Develop an Emergency Plan

The following will give you an idea of what it may cost to develop an emergency plan. Some recommendations can be done at little or no cost. Use this list from *What Are the Costs?* at <http://www.ready.gov/business/downloads/cost.pdf> (Ready Business, Homeland Security) to get started. Then, consider what else you can do to protect and prepare your employees and business.



No Cost

- Meet with your insurance provider to review current coverage.
- Create procedures to quickly evacuate and shelter-in-place. Practice the plans.
- Talk to your people about the company's disaster plans. Two-way communication is central before, during and after a disaster.
- Create an emergency contact list, include employee emergency contact information.
- Create a list of critical business contractors and others you will use in an emergency.
- Know what kinds of emergencies might affect your company both internally and externally.
- Decide in advance what you will do if your building is unusable.
- Create a list of inventory and equipment, including computer hardware, software and peripherals, for insurance purposes.
- Talk to utility service providers about potential alternatives. Identify back-up options.
- Promote family and individual preparedness among your co-workers. Include emergency preparedness information during staff meetings, in newsletters, on company intranet, periodic employee emails and other internal communications tools.

More than \$250

- Buy a fire extinguisher and smoke alarm.
- Decide which emergency supplies the company can feasibly provide, if any, and talk to your co-workers about what supplies individuals might want to consider keeping in a personal and portable supply kit.
- Set up a telephone call tree, password-protected page on the company website, email alert, or call-in voice recording to communicate with employees in an emergency.
- Provide first aid and CPR training to key co-workers.
- Use and keep up-to-date computer anti-virus software and firewalls.
- Attach equipment and cabinets to walls or other stable equipment. Place heavy or breakable objects on low shelves.
- Elevate valuable inventory and electric machinery off the floor in case of flooding.
- If applicable, make sure your building's HVAC system works properly and is well-maintained.
- Back up your records and critical data. Keep a copy offsite.

Costs to Develop an Emergency Plan (continued)

More than \$1,000

- Consider additional insurance such as business interruption, flood, or earthquake.
- Purchase, install and pre-wire a generator to the building's essential electrical circuits. Provide for other utility alternatives and back-up options.
- Install automatic sprinkler systems, fire hoses, and fire-resistant doors and walls.
- Make sure your building meets standards and codes. Consider a professional engineer to evaluate the wind, fire, or seismic resistance of your building.
- Consider a security professional to evaluate and/or create your disaster preparedness and business continuity plan.
- Upgrade your building's HVAC system to secure outdoor air intakes and increase filter efficiency.
- Send safety and key emergency response employees to trainings or conferences.
- Provide a large group of employees with first aid and CPR training.

OSHA Requirements Related to Emergencies

Emergency responder health and safety is currently regulated primarily under the following Occupational Safety and Health Administration (OSHA) standards.



- Exit routes, emergency action plans, and fire prevention plans (29 CFR 1910.33-1910.39)
- Fire brigades (29 CFR 1910.156)
- Hazardous waste operations and emergency response (29 CFR 1910.120)
- Respiratory protection (29 CFR 1910.134)
- Permit-required confined spaces (29 CFR 1910.146)
- Bloodborne pathogens (29 CFR 1910.1030)

Some of these standards were promulgated decades ago and none were designed as comprehensive emergency response standards. Consequently, they do not address the full range of hazards or concerns currently facing emergency responders. Also, this list of OSHA requirements does not address every emergency-related issue that may affect your workplace.

- Many do not reflect major changes in performance specifications for protective clothing and equipment.
- Current OSHA standards also do not reflect all the major developments in safety and health practices that have already been accepted by the emergency response community and incorporated into National Fire Protection Association (NFPA) and American National Standards Institute (ANSI) consensus standards.

An emergency response plan should be developed locally and should be comprehensive enough to deal with all types of emergencies specific to that facility.

When emergency action plans are required by a particular OSHA standard, the plan must be in writing; except for firms with 10 or fewer employees, the plan may be communicated orally to employees.
