



# Property Risk Consulting Guidelines

## PRE-EMERGENCY PLANNING RESOURCES

### INTRODUCTION

Throughout the world, various governmental bodies as well as consensus standards-making organizations and trade associations have promulgated numerous laws, regulations, standards and recommended practices related to pre-emergency planning. A list of nongovernmental organizations that provide pre-emergency planning resources can be found in [Table 1](#).

**TABLE 1**  
**Organizations That Provide Training Resources**

|                        | TEXT BOOKS | PERIODICALS | VIDEOS/DVDS | ON-SITE TRAINING | ON-LINE TRAINING |
|------------------------|------------|-------------|-------------|------------------|------------------|
| IFSTA                  | X          | X           | X           |                  | X                |
| AXA XL Risk Consulting |            | X           |             | X                |                  |
| ISFSI                  | X          | X           | X           |                  | X                |
| NAFED                  | X          | X           | X           |                  | X                |
| NFPA                   | X          | X           | X           | X                | X                |

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AXA XL Risk Consulting 100 Constitution Plaza, Hartford, CT 06103

ISFSI 14001C Saint Germain Dr. Suite 128, Centreville, Virginia 20121

NAFED 180 N. Wabash Avenue, Suite 401, Chicago, IL 60601

NFPA 1 Batterymarch Park, Quincy, MA 02269

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## PRE-EMERGENCY PLANNING RESOURCES

In the United States, the most commonly referenced documents related to pre-emergency planning are:

**Title 29 Code of Federal Regulations, Part 1910, Section 38 (29 CFR 1910.38)** This part of the Occupational Health and Safety Administration's (OSHA) regulations requires businesses with more than 10 employees to develop and maintain: 1) an Emergency Action Plan and 2) a Fire Prevention Plan.

The Emergency Action Plan must address:

- Emergency escape procedures and routes;
- Procedures for employees who remain behind to operate critical equipment;
- Procedures to account for employees after evacuation;
- Rescue and medical duties;
- Procedures for reporting fires and other emergencies;
- Names or titles of people who can be contacted for further explanation of the plan.

The Fire Prevention Plan must address:

- Major fire hazards in the workplace;
- Educating employees about the hazards in the workplace;
- Methods of controlling fire hazards;
- Names or titles of people responsible for maintaining protective systems;
- Names or titles of people responsible for controlling fuels that could be a hazard.

**Title III of The Superfund Amendments and Reauthorization Act 1986 (SARA Title III)**. This law mandates appointment of a Local Emergency Response Committee and the development of a comprehensive, Local Emergency Response Plan. The plan must be reviewed and revised annually, and must include:

- The identification of specific sites and transportation corridors in which extremely hazardous materials are stored, used or transported;
- Emergency-response procedures;
- Designation of a community coordinator and facility coordinator to implement the emergency plan;
- Emergency notification procedures;
- Procedures for determining the occurrence of a chemical release and the probable area and population that will be affected;
- Description of community and industrial emergency-response equipment and resources, and the identity of personnel responsible for them;
- Evacuation plans;
- Method and schedule for conducting emergency-response plan exercises.

**NFPA 1600, Recommended Practice for Disaster Management**. This document recommends minimum criteria for disaster management for the private and public sectors in the development of a program for effective disaster preparedness, response, mitigation and recovery.

**NFPA 1620, Recommended Practice for Pre-Incident Planning**. This consensus document spells out the recommended practices for pre-incident planning relative to fire and like emergencies in all occupancies.

## EMERGENCY RESPONSE RESOURCES

The on-site emergency response functions needed in most industrial/business facilities generally fall into four basic areas:

- Fire Suppression
- Hazardous Materials
- Medical Emergencies
- Confined Space or other Specialized Rescue

In evaluating a facility's need for these functions, relevant standards and regulations should be reviewed. The following is a brief list of pertinent standards and regulations related to emergency response.

**Title 29 of the Code of Federal Regulations, Part 1910, Section 156 (Fire Brigades).** This part of the OSHA regulations was promulgated in 1980 and specifies OSHA's requirements for industrial fire brigades.

**NFPA 600, Standard on Industrial Fire Brigades.** This document closely parallels OSHA's requirements and actually expands and clarifies the work done by OSHA in 1910.156 with regard to industrial fire brigades.

**Title 29 of the Code of Federal Regulations, Part 1910, Section 120, [HAZWOPER].** OSHA requires that personnel who function as emergency responders to incidents involving hazardous materials (HazMat) have minimum levels of training. The levels identified are:

- First Responder - Awareness
- First Responder - Operations
- Hazardous Materials Technician
- Hazardous Materials Specialist
- On Scene Incident Commander

**NFPA 472, Professional Competence of Responders to Hazardous Materials Incidents.** The performance requirements of this consensus standard closely parallel and further clarify those requirements in OSHA 1910.120.

**Title 29 of the Code of Federal Regulations, Part 1910, Section 151, (Medical Services and First Aid).** OSHA states: "If a medical facility is not located in proximity to the workplace, there shall be a person or persons on-site with adequate first-aid training. First aid supplies approved by a consulting physician shall be available on-site. If there is a potential of corrosive materials on-site, suitable facilities shall be available for drenching of eyes and skin."

**Title 29 of the Code of Federal Regulations, Part 1910, Section 146,(d)(9) (29 CFR 1910.146 (d)(9)).** OSHA explains its requirements regarding rescue from permit-required confined spaces. This requires employers to "develop and implement procedures for summoning rescue and emergency services, for rescuing entrants from permit-required confined spaces, for providing necessary emergency services to rescue employees, and for preventing unauthorized personnel from attempting a rescue."

OSHA requires that each employer who requires employees to enter permit required confined spaces to perform rescue services to ensure that each member of the rescue service:

- Is provided with, and is trained to use the personal protective equipment and rescue equipment necessary for making rescues from permit-required spaces;
- Is trained to perform assigned rescue duties in addition to the training required for confined space entrants;
- Practices a simulated rescue of a simulated victim from a confined space at least once per year;

- Is trained in basic first-aid and in cardiopulmonary resuscitation (CPR).

When an employer elects to have outside rescue services perform confined space rescue, OSHA requires the host employer to:

- Inform the rescue service of the hazards they may confront;
- Provide the rescue service with access to all permit-required confined spaces from which rescue may be necessary, so that the rescue service can develop appropriate rescue plans and practice rescue operations.

The Emergency Team must remember that regardless of whether the employer's personnel or outside rescue services are to perform confined space rescue, OSHA places all responsibility for the rescue operations on the employer.

## INCIDENT MANAGEMENT SYSTEMS RESOURCES

The following documents require that can be utilized for managing emergencies:

- NFPA 1600, Recommended Practice on Disaster Management
- OSHA 1910.120(q)(3) HAZWOPER
- NFPA 600, Standard on Industrial Fire Brigades
- NFPA 471, Recommended Practice for Responding to Hazardous Materials Incidents.

## Aids In Preparing The Written Document

### Put The Plan On Paper

The final product of the Pre-Emergency Planning efforts is the written plan. See [PRC.1.7.0](#). This is the document that takes all of the results of the planning work and puts it in a format that allows it to be easily used on a day-to-day basis by anyone involved in emergency response and recovery operations.

To be effective, emergency plans must be “user friendly” and written for ease of use and understanding by end users. To achieve this, we offer the following tips:

### Write For Understanding

- Write for the reader, not the writer.
- Keep it simple.
- Understanding and clarity is critical.
- Use easily understood text and avoid technical jargon.
  - Avoid abbreviations and acronyms unless they are clearly defined.
  - Long words and long sentences reduce clarity and increase the likelihood of misinterpretation by the reader.
- Use drawings and charts wherever possible.
- Provide a glossary of terms used within the plan.

### Format The Plan

- Use a binding system, such as a loose leaf binder, that allows for ease of revisions and/or additions.
- Divide the plan into sections.
- Number each section.
- Number each page with a section and page number so that any page can be updated without having to revise the entire section.

- Date each page, and show the “effective date,” the “date of revision” and the “date which the revision replaces.”
- Select a format that is functional and easy to navigate.
- Remember that a emergency plan:
  - Is a dynamic working document;
  - Will never be complete - it will always be in a state the revision.