

TRAINING REQUIREMENTS FOR EMERGENCY RESPONSE TEAMS

There is a growing trend toward the establishment of company in-house emergency response teams for handling emergencies that involve hazardous materials. The advantages of a company emergency response team becomes apparent when one considers that the damages and/or injuries (and subsequent liabilities) resulting from an emergency can often be reduced by eradicating it before it becomes difficult to control, or by preventing the emergency from expanding.

Most of the major compressed gas manufacturers have established their own emergency response teams to not only handle emergencies within the confines of their own operations, but will also respond to off-site emergencies. These teams are trained to work in cooperation with public emergency responders, such as the local fire department, in areas of their expertise. Also within the compressed gas industry, the Compressed Gas Association (CGA) sponsors a mutual aid program called COMPGEAP (Compressed Gas Emergency Action Plan), which works in conjunction with CHEMTREC in the United States and CANUTEC in Canada. Within the framework of COMPGEAP, participating member companies agree to make themselves available to each other to assist in off-site emergency situations that may take place where another participating company can respond more expeditiously than can the shipper/owner of the hazardous material. Further information on COMPGEAP can be obtained from the CGA at 1725 Jefferson Davis Highway, Arlington, VA 22202; Phone 703-979-0900.

Welding distributors, particularly those handling specialty gases, may find it prudent to set up emergency response teams, if they have not done so already. In some cases, manufacturers who supply gases in bulk containers, only, may not have emergency response teams trained to deal with emergency incidents for distributors handling their products in cylinder quantities. If you have, or intend to set up, an emergency response team, you will come under regulations that mandate training requirements for team members, depending on their involvement in mitigating emergencies.

Starting with SARA Title III, if you have a facility that has on hand, at any time, a hazardous substance over the Threshold Planning Quantity, you must appoint a facility emergency coordinator to cooperate with a local emergency response committee. In some instances, the local emergency response committee will ask a company to set up an emergency response team that they can work

with in cases of emergency releases. In other cases, if the local emergency response committee is well trained and equipped to handle releases, then the facility coordinator can elect to work with the local committee to handle such releases.

Once a company sets up its own emergency response program to handle any regulated hazardous substances, it must meet the requirements of OSHA regulation CFR 29 §. 1920.120. Under this regulation there are a number of designations of personnel, requiring varying degrees of training, that have specific duties to perform during an emergency. They are as follows:

1. **First Responder Awareness Level:** One who discovers or witnesses a release and initiates a sequence of response actions by notifying the proper authority about the situation. The First Responder must be trained to an awareness level that will allow him/her to recognize an emergency (or incipient emergency) condition. The amount of training is not specified by time, but designated as "sufficient training to demonstrate competency."
2. **First Responder operations Level:** Provides initial response to protect persons, property, and environment from the effects of a release. This responder is responsible for containing a release from a safe distance and keeping it from spreading, and also preventing exposures. At least 8 hours of training, or sufficient experience to demonstrate competence, is required.
3. **Hazardous Materials Technician:** Responsible for stopping a release. This technician is trained to know how to contain a release, and to know and understand the properties of the hazardous substances at the facility. He must know how to implement the emergency response plan, and be familiar with the instruments, equipment and personal protective equipment to be used in emergency situations. At least 24 hours of training is required.
4. **Hazardous Materials Specialist:** Provides support to Hazardous Materials Technicians and acts as liaison with outside authorities with regard to site activities during an emergency. This specialist must have a complete understanding of the emergency plan, and have the ability to develop a site safety and control plan. He/she must also understand the chemical, radiological;, and toxicological properties of the hazardous substances on site. At least 24 hours of training is required.

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5. **On scene Incident Commander:** The Incident Commandeer is the sole authority in conducting the activities at the site of an emergency situation. In many cases, a plant employee is assigned to be an Incident Commander, but often relinquishes his authority to an outside professional response organization, such as the local fire department,

in which case the Incident Commander position is taken over by the local responding fire chief. This is something that is usually worked out with the local authorities prior to an actual emergency condition. The Incident Commander must 1) know and be able to implement the Incident Command System, 2) know the hazards and risks associated with the site, 3) be familiar with state and federal regional plans and teams that can be called upon, if needed, for further support, and 4) be familiar with decontamination procedures. At least 24 hours of training is required.

All of the above persons shall receive a minimum of yearly refresher training of sufficient content and duration to maintain their competency in their areas of responsibility. There are organizations and consultants who offer such training, although in-house training is permitted as long as the people doing the training are considered capable of providing the information required. Depending on the types of hazardous products being handled, a close working relationship with a local fire department or emergency response committee may provide the necessary background for a company to take on the training program on an in-house basis.

**The following link will take you to
OSHA regulation CFR 29 1920.120**

[Click Here](#)