



Prepare Prevent Protect
SOUTH CAROLINA

Best Practices
workplace security

**A Report from the Governor's
Workplace Security Advisory Committee
May 23, 2002**

**Jim Hodges, Governor
General Steve Siegfried, Homeland Security Director
Rita McKinney, Committee Chair**

www.state.sc.us/homeland/index.html



State of South Carolina

Office of the Governor

JIM HODGES
GOVERNOR

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Dear South Carolina Employer:

Following the atrocities of September 11, 2001, our lives in the workplace changed forever. Previously, many businesses conducted workplace risk assessments; but little thought or preparation was given to the devastating enemy that we never anticipated. Now, with vigilance and swiftness, we must prepare for the hidden face of terrorism.

To help protect South Carolina's companies, I appointed a Workplace Security Advisory Committee to address terrorism in South Carolina industries. I named Rita M. McKinney, Director of the South Carolina Department of Labor, Licensing and Regulation, chair of the committee. Serving on the committee with her are some of the top safety and health professionals from the communications, chemical, manufacturing, utility, fire service, law enforcement and other governmental sectors of the employment arena.

I charged the committee to identify safety and health threats in the workplace that could possibly occur from terrorist activity or sabotage; to ascertain possible targets of terrorism; and to develop and disseminate checklists of best practices for private and public sector employers in preventing and responding to terrorist activity or sabotage.

To assess the effectiveness of South Carolina companies' current emergency response plans, the Workplace Security Advisory Committee conducted a survey of 300 business people statewide. Survey responses came from the following industry segments: manufacturing, utilities, construction, distribution, electric motor repair, consulting, government, janitorial services/cleaning, lumber, nursing/medical, printing, repackaging, telecommunications and waste water treatment. Of the companies responding, 24 percent of small-size companies (1-250 employees) did not have written emergency preparedness plans; and 20 percent of medium-size companies (251-500 employees) did not have plans; but all large-size companies (501-1000 employees) had plans.

Likewise, the Committee's survey found that where emergency response plans exist, some plans failed to include:

- Management's commitment to the plan. Management must set policy, assign duties and support responsibilities.
- Employee involvement in the planning process. Employees often have specialized knowledge and can offer critical information.
- A working system for hazard identification and control.
- Employee training and understanding of worksite hazards.

Regardless of the sincere intent of a plan, these oversights can render an employer's work force vulnerable or unable to handle an emergency.

In an effort to keep all workplaces and communities safe, the Committee developed a Homeland Security Guide containing best practices for employers. This guide offers a template from which you can develop specific practices that will protect your employees and your company. The guide includes references, resources, and guidelines that address security, safety, terrorism, emergency preparedness, crisis management and other issues, enabling private and public sector employers to prepare, react, recover and ultimately prevent potential crises through the use of best practices.

The Homeland Security Guide provides resources to assist you in addressing terrorism and sabotage, minimizing damage to your business and community and, most importantly, saving lives. The guide is available to all employers free of charge on the Internet at the Homeland Security Office web address, www.state.sc.us/homeland/index.html, or by calling the South Carolina Department of Labor, Licensing and Regulation at 803-896-4380. It also is being distributed through a multitude of state agencies and business organizations.

After reviewing the Homeland Security Guide, we welcome your input. With your ideas and suggestions, the guide periodically will be revised to better address your security needs. Please let us know your suggestions by writing to the Workplace Security Advisory Committee at P.O. Box 11329, Columbia, SC 29211-1329 or by sending an email to: contactllr@mail.llr.state.sc.us

Thank you for all you do to make South Carolina's workplaces safe and secure.

Sincerely,

Jim Hodges
Governor, South Carolina

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DISCLAIMER

NOTE: The intent of this guide is to ensure a safe and healthy working environment through the implementation of sound work site security measures. This guide does not attempt to provide a comprehensive list of security considerations, nor does it assume that the user will be in compliance with local, state or federal laws or regulations.

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Is your company at risk of a terrorist attack?

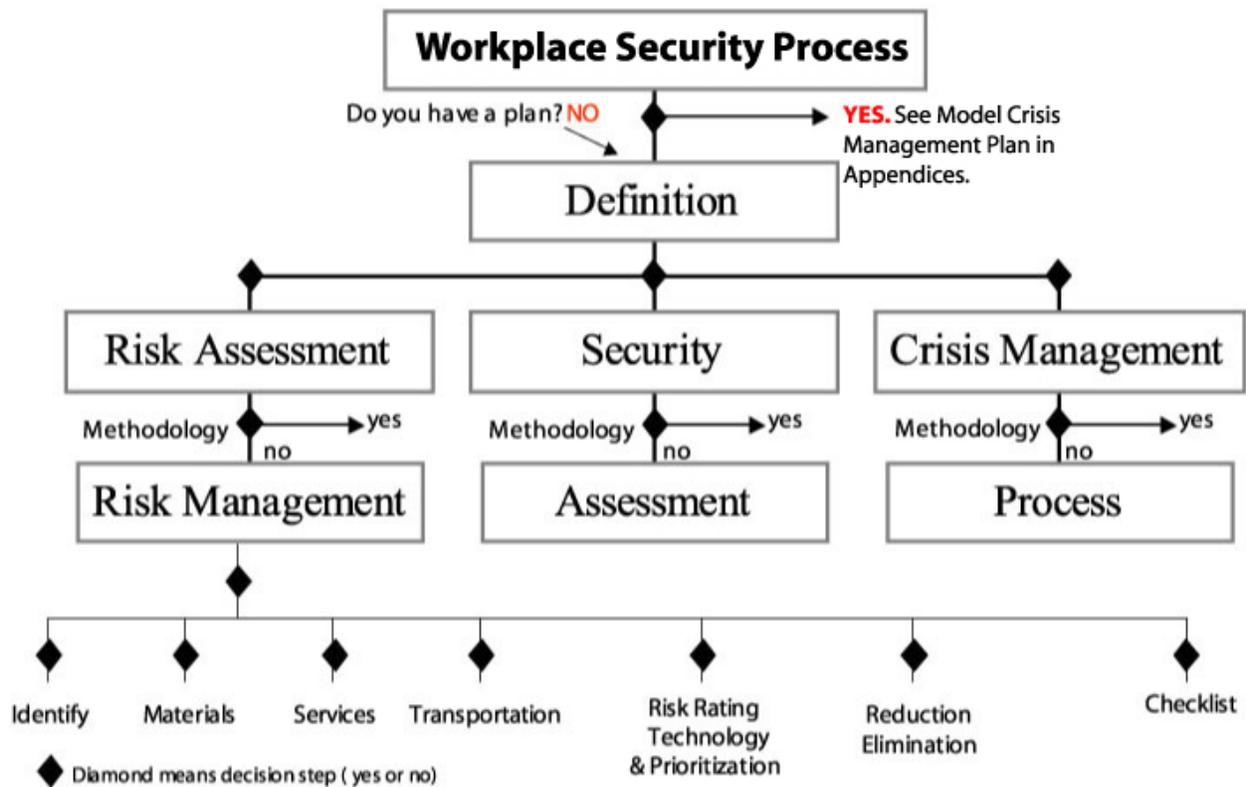
Absolutely!

Regardless of your size, location, or technology, terrorists could involve you, your employees and your business in their evil plot. They could hijack one of your trucks loaded with flammable materials and crash it into a public school, steal hazardous chemicals from your worksite to bring harm to a neighboring city, or drive a delivery truck with a bomb onto your property.

In short, no one is safe from terrorism.

One very important question you need to ask yourself is: Do I have a workplace security plan for my company that includes risk assessment, security processes and crisis management? If so, when was the last time the plan was modified, revised and/or reviewed? Do you practice the plan and does each employee understand his/her role? Is management committed to the plan?

This Workplace Security Guide is designed to assist you in assessing your company's level of risk and to suggest ways to manage that risk.



Use the above diagram to develop a workplace security plan for your company. Have you conducted a risk assessment of your business? If your answer is no, consider these questions: What are your hazards? Focus on the materials, services and transportation areas of your business. What is the probability that the hazards could be used in acts of terrorism/sabotage? How can you reduce or eliminate the hazard/hazards?

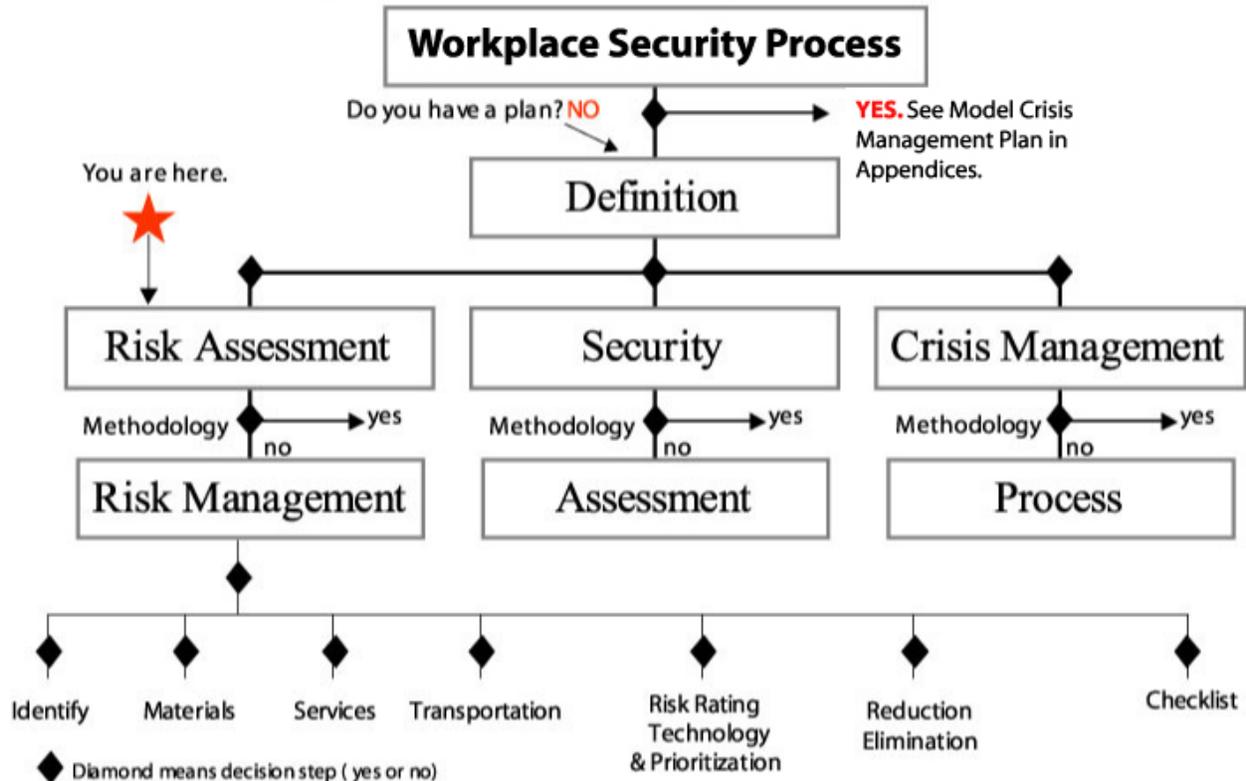
If your risks can't be reduced or eliminated, then you must manage them through security and crisis management. Assess and address the security of your employees and work site. What and where you are your vulnerabilities?

Next, develop a crisis management plan for your business so that if your company is the subject of a terrorist act, you and your employees can successfully respond and recover from the event. If you already have a plan in place, go to page 36 in the Appendices to review the model Crisis Management Plan located there to determine if your plan is up to date and whether revisions/modifications are needed.

For the safety of you, your employees, your company and our state, you must: Prepare, Prevent and Protect.

Risk Assessment and Risk Management

Sections I and II, Risk Assessment and Risk Management, offer information and a working guide from which managers can determine their company's level of risk and how to manage the risk. By taking the time to review the risk elements, you will be able to evaluate, eliminate or better manage the risk elements inherent to your work site.



Section I – Risk Assessment

What is Risk Assessment?

Performing a risk assessment is the first step toward ensuring that all hazards at a worksite have been identified.

Risk is the chance of injury, damage, or loss.

Chance means the probability of something happening.

A **Hazard** is something that is dangerous – an object, a chemical, an infectious agent, or a situation. Hazards are categorized into three groups; **Physical** hazards, **Chemical** hazards, and **Biological** hazards

Risk assessment is an action or series of actions taken to recognize or identify hazards and to measure the risk or probability that something will happen because of the hazard. In evaluating risk, the severity of the consequences is also taken into account.

Worksite Risk Assessment List

Identify your risks

The following set of questions entitled “Worksite Risk Assessment List” is a starting point to identify worksites thought to have the highest level of risk as a target. Answer the questions and identify factors that may place your worksite at a higher risk of an intentional harmful act. If you answer YES to any of the questions, then proceed to the next section to better understand the risk assessment process and to begin applying risk management techniques in eliminating, reducing, or mitigating these risks.

Does your work site USE, HANDLE, STORE or TRANSPORT **Hazardous Materials**? YES NO *If YES, what category of Hazard?*

<input type="checkbox"/> Chemicals <ul style="list-style-type: none"> • Flammable liquids, solids or gases • Toxic or Poisonous Materials • Corrosive Materials • Reactive Materials • Oxidizers or Organic Peroxides 	<input type="checkbox"/> Biological/Infectious Materials <ul style="list-style-type: none"> • Select Agents <input type="checkbox"/> Radioactive Materials <ul style="list-style-type: none"> • Licensed Materials <input type="checkbox"/> Explosives	<input type="checkbox"/> Other Potential Hazards _____ _____ _____ _____
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Does your work site **Provide Essential Service**? YES NO *If YES, which of these services fits your worksite?*

<input type="checkbox"/> Utility Provider <ul style="list-style-type: none"> • Electricity, Sub-stations, etc. • Fuels, pipelines, etc. <input type="checkbox"/> Communications <ul style="list-style-type: none"> • Telephone, Internet, Radio, TV, Computer Systems 	<input type="checkbox"/> Sewer Treatment Facility <input type="checkbox"/> Emergency Services <ul style="list-style-type: none"> – Law Enforcement, Fire Services, Health Care, Public Health 	<input type="checkbox"/> Food or Water Provider <ul style="list-style-type: none"> • Water Treatment/Supply • Food Processing • Food Service <input type="checkbox"/> Other
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Does your work site have a **High Volume of Pedestrian Traffic**? YES NO *If YES, what type of facility creates the traffic?*

<input type="checkbox"/> Airport <input type="checkbox"/> Sports Facility <ul style="list-style-type: none"> • Open Stadium • Inside Arena <input type="checkbox"/> Hospital	<input type="checkbox"/> High Rise Office Complex <input type="checkbox"/> Auditorium <ul style="list-style-type: none"> • Entertainment event <input type="checkbox"/> School <input type="checkbox"/> University	<input type="checkbox"/> Large Shopping Mall <input type="checkbox"/> Tourist Attraction <ul style="list-style-type: none"> • Entertainment Park • Resort/Recreation Area <input type="checkbox"/> Other
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Does your work site have a **Limited Means of Egress**? YES NO *If YES, which describes the reason for limitation?*

<input type="checkbox"/> High Rise Complex	<input type="checkbox"/> Underground Operations	<input type="checkbox"/> Other
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Does your work site have a **High Volume of Incoming Materials**? YES NO *If YES, what type of materials?*

<input type="checkbox"/> Mail and Small Packages <input type="checkbox"/> Import and Export of Materials	<input type="checkbox"/> Bulk Packages, Materials, Equipment	<input type="checkbox"/> Raw Materials <input type="checkbox"/> Other
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Is your work site considered a **High Profile Site**? YES NO *If yes, what is near your worksite?*

<input type="checkbox"/> Located Close Proximity (1/4 mile) to Other Characterized Sites <input type="checkbox"/> Water Dams	<input type="checkbox"/> Higher Media/ Public Relations Impact (Landmark etc.) <input type="checkbox"/> Military Installation	<input type="checkbox"/> Classified Site <input type="checkbox"/> Other
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Is your work site considered **Transportation Related**? YES NO *If YES, what type of transportation?*

<input type="checkbox"/> Airlines <input type="checkbox"/> Shipyards/Port/Cruise Ships <input type="checkbox"/> Transportation Affiliated <ul style="list-style-type: none"> • Bridges/Tunnels • Major Traffic Activities 	<input type="checkbox"/> Bus Lines <input type="checkbox"/> Trucking	<input type="checkbox"/> Train/Rail <input type="checkbox"/> Vehicle Rental/Lease <ul style="list-style-type: none"> – Cars, Trucks, etc. <input type="checkbox"/> Other
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Section II - Risk Management

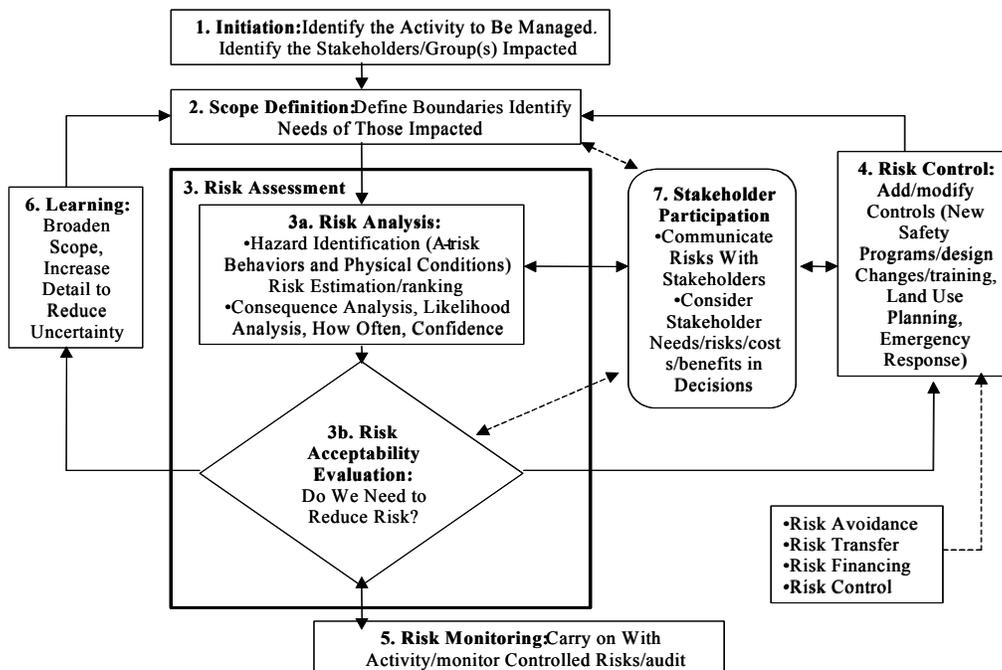
Once you have identified the risk, you should review the risk management portion of the plan and address proactive, preventative control measures.

Risk Management is divided into two distinct areas: risk reduction/elimination and management of the risk.

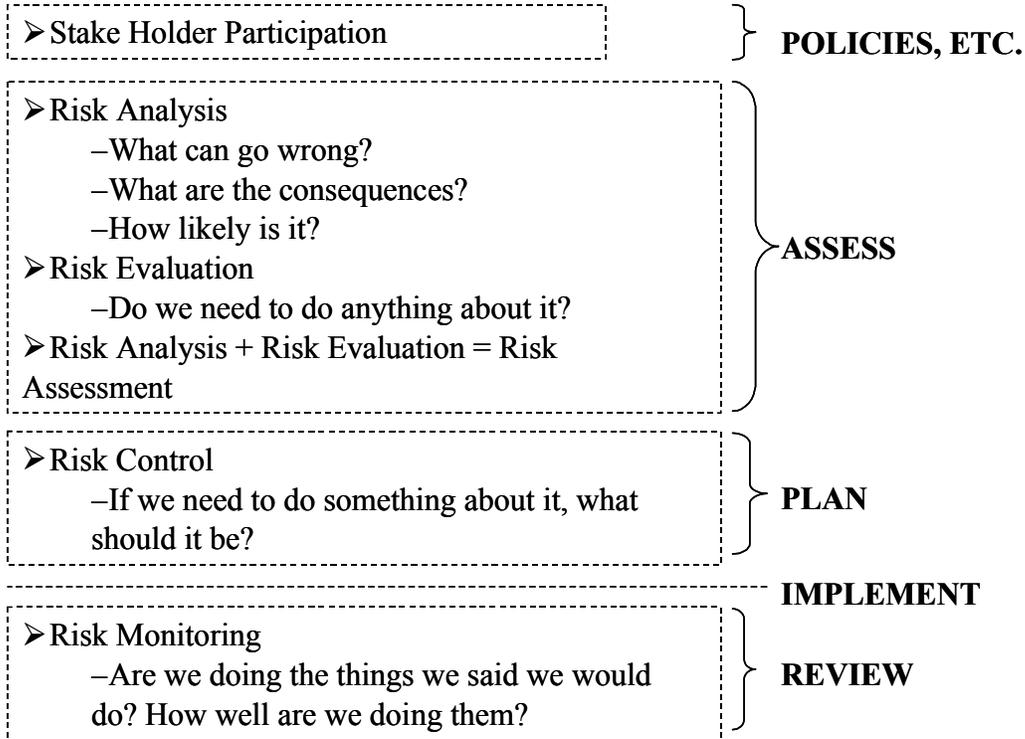
1. Risk reduction/elimination. **Can the risk be reduced or eliminated? Part one of this section list ways to reduce or minimize some of the risks identified on page 10.**
2. **Management.** If the risk cannot be eliminated, it must then be managed through security and crisis management.
 - a. **Security.** For many risks, an important risk management tool is to increase security. Security information is given on page 16 of this section.
 - b. **Crisis Management.** A crisis management plan should be in place to clearly identify everyone's responsibilities during an emergency. Every workplace should have an emergency action plan that is communicated to employees both verbally and in writing. The event that requires emergency action could be a fire or explosion caused by an act of terrorism/sabotage. Crisis management is discussed in page 25 of this section.

Be aware that the risk management process is an ongoing process and must be periodically re-evaluated (at least annually).

Risk Management Process Flowchart



Risk Management Summary



Risk Management – Part 1

Risk Reduction/Elimination

Can the risk be reduced or eliminated?

Risk reduction/elimination methods and reference information are provided for chemicals, infectious material, radioactive materials, explosives, utility providers, sewer treatment facilities, emergency services, food or water providers, workplaces with a high volume of incoming materials and transportation-related workplaces. Employers should take into account the type of personal protective equipment needed for employees and the implementation of a hazardous material communication plan.

Risk Reduction for Chemicals

- Utilize less hazardous chemicals.
- Minimize amounts of hazardous chemicals on-site.
- Establish access control measures.
- Establish checklists and more frequent safety walkthroughs looking at critical equipment and control measures.
- Revisit all Process Hazard Analyses addressing the consequences and likelihood of intentional harmful acts.
- Inspect storage sites (current and old).
- Building Security through Design, American Institute of Architects

Suggested References:

- American Industrial Hygiene Association – www.aiha.org
- Chemical Biological Terrorism – www.aiha.org
- LLPC and Deliberate Releases – www.epa.gov/ceppo
- Transportation Security for Chemical Industry Guidelines for the U.S. Chemical Industry – www.americanchemistry.com/cmawebsite.nsf/s?readform&nar-54bnk5
- Site Security/Chemical - <http://www.socma.com>

Risk Reduction for Biological/Infectious Material

- Does the infectious agent need to be on-site?
- Limit access to infectious materials, particularly select agents.
- Establish strict inventory requirements.

Suggested References:

- List of Select Agents – www.cdc.gov/od/ohs/lrsat/42cfr72.htm#Appendix%20A; also see Appendices
- Select Agents – www.cdc.gov/od/ohs/lrsat.htm
- Laboratory Risk Assessment – www.phppo.cdc.gov/nltn/pdf/lrawwh.pdf
- Laboratory Security – www.cdc.gov/od/ohs/biosfty/bmbl4/bmbl4toc.htm see Appendices F
- Transportation and Transfer of Biological Agents – www.cdc.gov/od/ohs/biosfty/bmbl4/bmbl4toc.htm see Appendices C
- Workplace Risk Pyramid – www.osha.gov/bioterrorism/anthrax/matrix/pyramid.html
- Small Pox Health Information - <http://www.cdc.gov/od/oc/media/>, <http://www.cdc.gov>
- Press Kit on Terrorism - <http://www.cdc.gov/od/oc/media/9-11pk.htm>
- DHEC – www.scdhec.met/CO/ELSA/elsachem.htm

Note: See Select Agencies, Appendices “C”

Risk Reduction for Radioactive Materials

- Re-examine type of materials and need for materials to be on-site.
- Develop safety checklist and conduct safety walkthroughs more frequently.
- Maintain precise inventory.
- Strictly enforce conditions of license.

Suggested References:

- U.S. Nuclear Regulatory Commission Brochures – www.nrc.gov
- Protecting Building Environments from Airborne Chemical, Biological, or Radiological Attacks – www.cdc.gov/niosh
- Indoor Air Quality – www.asse.org or www.ASHRAE.org

Risk Reduction for Explosives

- Re-examine type of materials and need for materials to be on-site.
- Develop safety checklist and conduct safety walkthroughs more frequently.
- Maintain precise inventory.
- Be aware of warning signals and devices.

Suggested References:

- Federal Explosives Laws and Regulations – www.atf.treas.gov/
- Security for fertilizer manufacturers – <http://www.atf.treas.gov/pub/threat/secure.htm>

Risk Reduction for Utility Providers

- Provide tighter security for elements of facility that are considered critical.

Suggested References:

- A Guide for Small Public Entities – www.riskinstitute.org
- SC Municipal Association – www.masc.state.sc.us

Risk Reduction for a Sewer Treatment Facility

- Provide tighter security for elements of facility that are considered critical.

Suggested References:

- A Guide for Small Public Entities – www.riskinstitute.org
- SC Municipal Association – www.masc.state.sc.us

Risk Reduction for Emergency Services

- Establish rigid control measures for vehicles, equipment, uniforms, etc. at all times. Consider a pass control/code system for operation of vehicles.

Suggested References:

- Safety of Emergency Responders – www.cdc.gov/niosh/emrandrpt.html

Risk Reduction for Food or Water Provider

- Identify and establish methods to check for product contamination

Suggested References:

- Food and Drinking Water Safety – www.foodsafety.gov/~fsg/bioterr.html

Risk Reduction for Workplaces with a High Volume of Incoming Materials

- Train personnel on handling of mail and other suspicious materials.
- Provide personal protective equipment for employees.
- Implement a hazardous materials communication plan.
- Screen material before delivering to critical area.
- Move high volume mail handling away from critical activities.
- Designate a receiving area away from critical activities.

Suggested References:

- Suspicious Mail – www.fbi.gov/pressrel/pressrel01/mail3.pdf

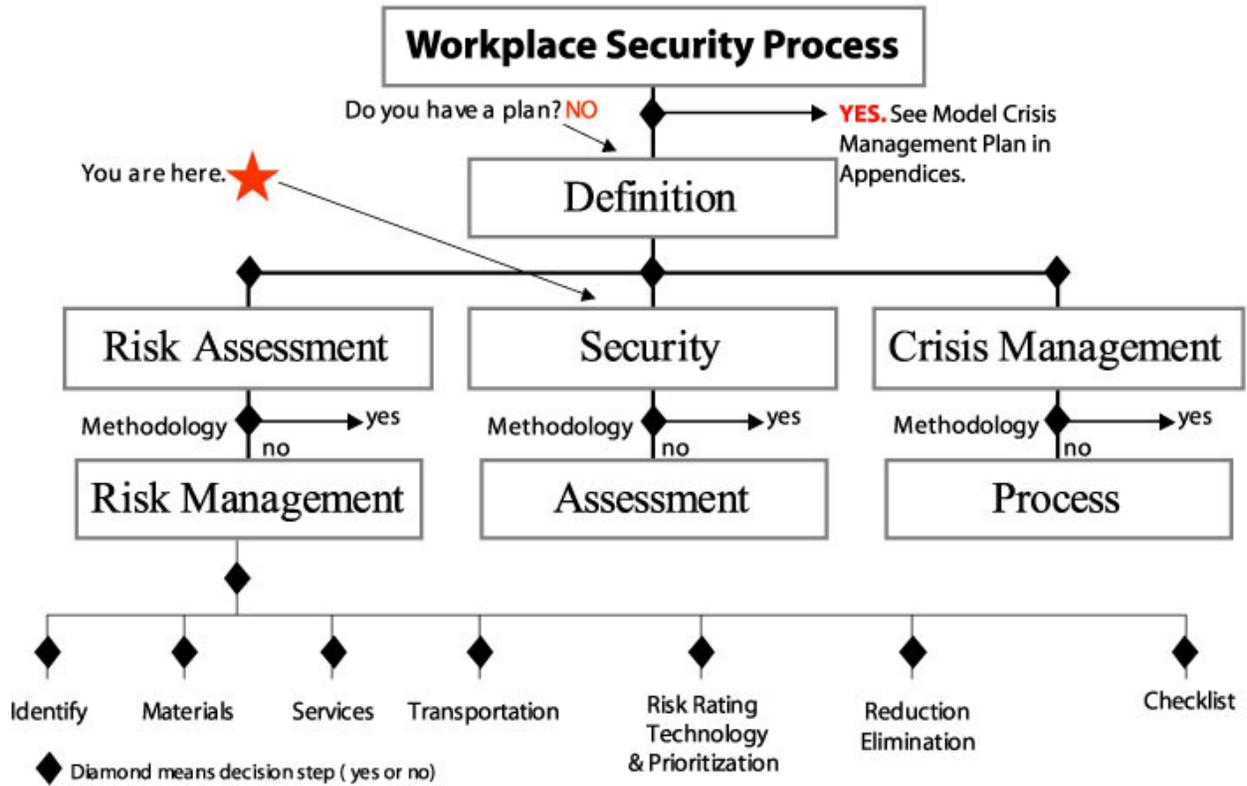
Risk Reduction for Transportation Related Workplaces

Suggested References:

- Hazmat safety – <http://hazmat.dot.gov/>
- Risk Management for the Safe Transportation of Hazardous Materials – <http://hazmat.dot.gov/risk.htm>
- Nuclear Materials Transportation – www.nrc.gov/materials/transportation.html
- U.S. Nuclear Regulatory Commission Brochures – www.nrc.gov

Risk Reduction for Workplace Violence/Security

- http://165.235.90.100/DOSH/dosh_publications/worksecurity.html
- <http://www.city.richmond.bc.ca/emergency/police/cpbook/cp11.htm>



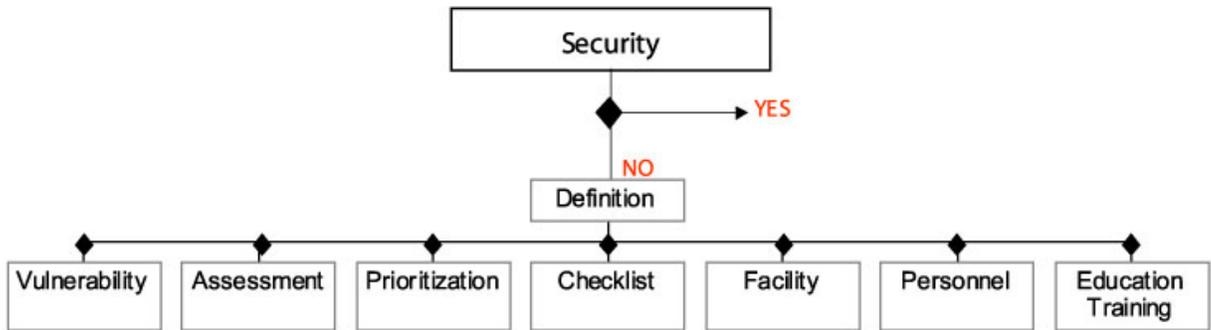
Risk Management - Part 2

Workplace Security

Use this section to learn about available security measures and to determine which are appropriate for your site. These measures include: physical security, personnel security, internal security, post event follow-up and training. Additionally, a list of security-related resources is included at the end of the section.

No security system can be effective without employee knowledge and operation. Employees must know how to properly operate the security system. No one should be allowed to disable or take shortcuts that compromise the integrity of your security system.

This section can be used as a checklist for you to consider the security measures that you may already have in place at your business and to highlight other security measures that you may want to consider.



Physical Security includes but is not limited to:

External lighting

- Check with your power company to help design a lighting diagram. The engineers will be able to help you locate lighting and choose the best type of lighting to be most effective.
- Survey your present lighting at night to see which areas need additional lighting.
- Inspect lighting regularly for bulbs, photo controls or starter boards that need replacing.
- Secure substation to prevent disrupting the power source.

Fencing/gates

- Inspect facility fencing regularly for vandalism, and if possible, vary the time of day of the inspection. Provide clear path/road inside fence to allow for patrol and integrity inspections.
- Keep all gates closed and allow only authorized persons to enter. (The gates, however, must not create a hazard to employees.)
 - Employees may enter the gate through an automatic keypad or a remote control.
 - If public companies regularly use the facility, such as in a wastewater treatment facility, place a phone at the gate to call the gate operator. The operator may need to have a remote phone and a remote control for times when he/she may not be in the control room.
 - Additional precautions for railroad access should be considered.
- Erect a chain link (at least eight feet) with barbed wire.

Signs and tags

- Use “Keep Out/ Only Authorized Persons Allowed On the Premises” signs on each side of the perimeter fence and on each gate. Place signs approximately 50 feet apart.
- Use large fluorescent letters.
- Post notification that all vehicles and persons are subject to search.

Closed Circuit Television (CCTV) surveillance system

- Locate the recorder in a secure area.
- Locate the monitor at a console with an attendant. Attentive watching time is about two hours, so vary employees regularly.
- Use cameras with motion sensors to alert attendants watching monitors that there is activity in the area.
- Use quality equipment with a clear night picture.
- Closed Circuit TV should not be used as a primary means of detection. CCTV is a passive system that requires human interaction for detection. It should be utilized as a tool to assess alarms that are triggered by more active forms of detection. Other methods

of detection could be microwave, infrared or fiber optic that monitor the area for intrusion.

Identification Badges

- Require all employees to wear picture identification badges.
- Update badges regularly so the pictures are recent.
- Require all employees who leave the company to turn in badges during the exit interview.
- Make badges unique to company and tamper proof.

Access control

- Place access controls or similar devices on all employee entrances to buildings.
- Periodically inventory, reissue, and reassign control badges and access passes.
- Require employees to use employee entrances, never public entrances.
- Design access in a manner that cannot be compromised.

Inspection of all vehicles

- Have a specific inspection policy in place that requiring inspection of all vehicles.
- Develop a “no parking” safe zone a minimum of 150 feet from any critical facilities.
- Access to facility should be limited, and those personnel admitted should be monitored at all times.
- Require all visitors and contractors to wear badges when in the facility. ID badges should be consistently worn by visitors and employees on the same part of the body to make it easier for security officers and employees to identify unauthorized personnel.
- Require all visitors to sign in and state purpose upon entry, and sign out when exiting the facility.
- Require an escort for visitors.
- All visitors/contractors should have a company contact identified.

Exterior doors

- Keep exterior doors locked from outside entry and monitor regularly.
- Employ proper and quality locking mechanisms.
- Ensure all modifications for locking mechanisms comply with building and fire codes.

Alarms/signals

- Install a communication or buzzer system at the reception desk and in isolated work areas. Develop a policy on response to the buzzer.
- Have a panic alarm installed that rings in another area in the workplace.
- Install more than one panic button.
- There should be a crisis communication procedure among key personnel and security providers involving intercoms, telephones, duress alarms and other concealed means of communications.
- Establish separate alarms/signals for security and fire.

Control of entry

- Use gates, turnstiles, fencing, a security force member or a monitoring system to control access.
- Identify and secure (with bars, etc.) drainpipes large enough for an intruder to gain entry to your facility.
- Ensure receptionists have more than one exit from their workstation.
- In public service offices, review the placement of the desk in the employee’s office. Is the desk by the door so the employee can make an unobstructed emergency exit? When

speaking to a customer, try not to have the customer seated between the employee and the exit.

- Utilize cameras or security officers.
- Consider furniture placement not to impede emergency egress.

Guards/patrols

- Post a security guard at the main building entrance or at entrances to specific offices.
- Develop post orders for each security post that is manned to give the security guard a clear understanding of his/her responsibilities.
- Ensure that guards have a clear view of employee entrances at all times.
- Provide a means for guards to contact law enforcement quickly.
- Contract with a reputable security firm.
- Consider using armed guards.

Auditing

- Perform regular auditing of all security procedures at least bi-monthly.
- Have audits conducted by a certified security professional.

Testing

- Test security systems at least once a year.

Other considerations

- Keep areas orderly and clean so strange objects and packages can be easily identified.
- Allow janitorial services on site only on the day shift.

Personnel security includes but is not limited to:

Background investigations for employees/contractors/sub-contractors

- Set acceptance guidelines for background investigations based on the type of jobs performed.
- Use DOT background checks for all drivers.
- Employ a reputable firm to perform background checks.
- Make sure employees are bonded.
- Be sure to verify through the I-9 process that every applicant is authorized to work in the USA. It is the law, and it makes good sense from an employment and security standpoint.

Personal references

- Request three personal references and contact each reference.

Pre-employment drug & alcohol testing

- Be sure questions are consistent with state and federal laws and regulations and appropriate for the position being considered.
- Consider random and for cause (accident, incident) testing. (Hair testing is considered by many experts to be the best system to use to identify drug use.)

Credit checks

- Perform a credit check on applicants.
- Consider conducting a credit check every five years.

Multiple interviews

- Conduct a minimum of two interviews to fully assess the candidate.

Education

- Check with schools listed on the application.
- Verify schools listed on the application.
- Secure a certified copy of transcripts from the schools.

Employment agency

- Utilize a reputable firm.

Driving record

- Check to see that applicant has a valid driver's license.
- Obtain a certified driving record for the applicant that includes several years of driving history.
- Get a 10-year Motor Vehicle Registration (MVR) history on the applicant.
- Note: You must have the person's authorization to obtain the document.
- Visit the DOT Web site: <http://www.fmcsa.dot.gov/cmvdhc.htm>

Termination procedures

- Incorporate a formal process and ensure employee's access to facilities is removed from security access.
- Retrieve company ID, access control card and keys.
- Change combination locks.
- Change computer passwords.
- Assess the worker's violence potential with involuntary terminations of employment.

Threat response/workplace violence training

- Have a clear workplace violence prevention policy that is enforced and specifies unacceptable behaviors.
- Have clear reporting procedures.
- Have a means to conduct threat assessments and determine appropriate interventions.
- Provide education and training on:
 - Warning signs and management style
 - Evacuation procedures
 - Stress management
 - Conflict resolution
 - Communication skills
 - Proper disciplinary practices
 - Stress and self esteem
- Conduct training on a regular basis.

Security awareness training

- Include a review of the security policy during new hire orientation.
- Conduct training on emergency and non-emergency situations:
 - Emergency- if an injury has occurred or there is an immediate threat of physical harm.
 - A "threat" or a "threatening situation"
 - A threat is a communicated intent to inflict physical or other harm to another person.
 - A threatening situation is a situation where one person through intimidating words or gestures has induced fear and apprehension of physical or other harm.
- Conduct training on a regular basis.

Passports and visas for foreign nationals

- Have passports and visas reviewed by recruiter, copied, and reviewed by an official with the United States Immigration and Naturalization Service (INS).

- Verify through the I-9 process that every job applicant is authorized to work in the USA (whether they are a citizen of the USA or otherwise properly in this country).

Internal Security includes but is not limited to:

Bomb threat/fire/explosion/chemical threat procedures

- Obtain the FBI Bomb Threat information card or similar document.
- Document and incorporate formal and written procedures.

Evacuation plans/emergency preparedness/incident command (inside company/outside company)

- Prepare a pre-plan and involve all outside agencies in regular drills.
- Review/practice annually.
- Review the site location and neighboring businesses to assess the possibility of your involvement should you or your neighbors have an incident.

Access control for restricted/secure areas

- Limit the number of employees having access to restricted/secure areas.

Protection for company trade secrets/assets

- Limit the number of employees with access to company trade secrets/assets.

Protection for employee valuables

- Appropriately secure personal valuables.

Payroll protection

- Money should be kept in secure containers.
- Limit access to payroll/revenue.

Outside agency liaison (know who to call)

- Police
- Fire
- EMS
- Identify telephone numbers and names of appropriate officials and ensure that this list is updated on a regular basis.
- Develop a strong relationship with local law enforcement. (Keep them well informed about terminations, etc. Encourage and invite officers to your facility. Invite them to employee functions. Give them a tour of your operation so that they will have an understanding and appreciation of the layout.)

Equipment and material passes

- Maintain control on the issuance and return of such passes.

Post incident action and follow up:

Evaluate employee(s) medical condition

- Identify employees who are certified in first aid or CPR; notify EMS as necessary.

Survey the scene

- Identify the specific roles of security/safety personnel.

Defusing

- Hold defusing session immediately, or as soon as possible after the incident.
- Should be led by someone trained in Critical Stress Management, for example, EAP provider.
- Assist employees with the after effects of trauma.

Notify external agencies if necessary -- local, state and federal.

- FBI

- SLED
- LLR
- DHEC
- Document the telephone numbers and names of appropriate officials.

Investigation

- Gather facts of the incident to provide responding officials.

Debriefing

- Hold debriefing 24-48 hours after the incident.

Critiquing session

- Hold critiquing session as soon as possible after the incident.
- Get managers, supervisors and employees together and review how the situation was managed.
 - How was the incident handled?
 - Who responded?
 - How could it have gone better?
 - How could it have been prevented? (Review security procedures.)
 - How effective were the defusing and debriefing sessions?
 - Is there a need for policies for management of the incidents?
 - Do safety procedures and workflow procedures exist? Were they followed? Did they work?

Employee Assistance

- Establish in-house or contract with a reputable employee assistant program, chaplains or professional counselors, etc.

Site restoration

- Coordinate with appropriate management personnel.

Post-incident briefing/discussion

- Conduct briefing/discussion within the first week following the incident and repeat if necessary.
- Insure closure on action items from the investigation.

Training

- Types of training
 - Personal safety and security measures
 - Types of incidents to report to law enforcement/security
 - Types of measures security/law enforcement may take to protect employees during a violent incident
 - Suggestions on how to react to an armed attacker
 - Suggestions for dealing with angry customers/clients/employees
 - Suspicious packages
 - Bomb treats
 - Hostage situations
 - Telephone harassment and threats

Resources

Local, state and federal government agencies

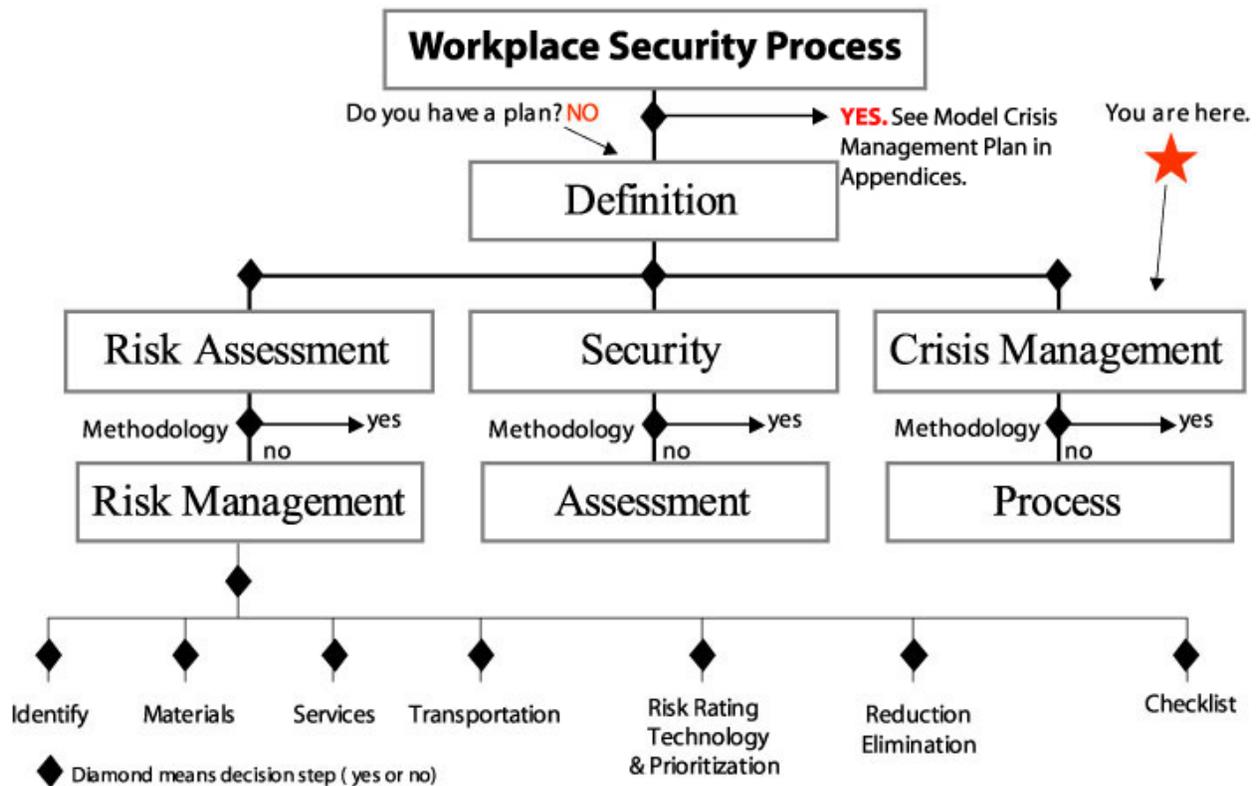
- Law enforcement
 - Local police, sheriff

- Dial 911
- State Law Enforcement Division (SLED) www.sled.state.sc.us
(803) 737-9000
(803) 896-7000 (emergency only)
- Federal Bureau of Investigation (FBI) www.fbi.gov
(803) 551-4200
- Drug Enforcement Administration (DEA) www.usdj.gov/dea
(803) 765-5251
- Highway Patrol Headquarters www.scdps.org
(803) 896-7920
- Fire
 - Dial 911
- Employee assistance
 - Society for Human Resource Management www.shrm.org
1-800-283-7476
(703) 548-3440

References

- National Safety Council (NSC) www.nsc.org
- South Carolina Occupational Safety Council www.scosc.org
(803) 738-1608
- Centers for Disease Control (CDC) www.cdc.gov
(404) 639-3011
- South Carolina Law Enforcement (SLED) www.sled.state.sc.us
(803) 737-9000
(803) 896-7000 (EMERGENCY ONLY)
- Federal Bureau of Investigation (FBI) www.fbi.gov
(803) 551-4200
- Association of General Contractors (AGC) www.cagc.org
(704) 372-1450
- Federal Emergency Management Association (FEMA) www.fema.gov
(202) 646-4600
- SC Emergency Preparedness Division www.state.sc.us/epd
(803) 737-8500
- SC Department of Insurance www.state.sc.us/doi
(803) 737-6160
- SC Hospital Association
(803) 765-9000
- SC Department of Transportation www.dot.state.sc.us
(803) 737-2314
- American Industrial Hygienists Association www.aiha.org
(703) 849-8888
- American Society of Safety Engineers www.asse.org
(847) 699-2929
- SC Chamber of Commerce Safety and Health Committee www.sccc.org
(803) 799-4601
- SC Employment and Labor Law Attorney, SC Bar Association www.sccbar.org

- (803) 799-6653
- SC Worker's Compensation Commission www.wcc.state.sc.us
(803) 737-5700
- SC Department of Health and Environmental Control www.scdhec.net
 - Bureau of Community Health
(803) 898-0755
 - Bureau of Disease Control
(803) 898-0713
 - Bureau of Environmental Health
(803) 896-0646
 - Bureau of Epidemiology
(803) 898-0742
 - Hot-line for Spills, Oils and Materials
(803) 898-3432
- US Department of Transportation (company carrier/fleet information)
www.safersys.org/
- US Department of Transportation (main web site) www.dot.gov
- Federal Motor Carrier Safety Administration www.fmcsa.dot.gov
- SC Department of Labor, Licensing and Regulation (LLR)
www.llr.state.sc.us
 - OSHA
(803) 734-9631 (main number)
(803) 734-9648 (complaints)
(803) 734-9631 (standards interpretation)
1-888-522-6735 (statewide toll-free number)
 - Office of OSHA Voluntary Programs (OVP)
(803) 734-9599 (main number)
(803) 734-9599 (OSHA Education & Training)
(803) 734-9599 (consultation - health & safety)
(803) 734-4288 (Voluntary Protection Programs)
- Arson Control Team
(803) 896-7000
- Bomb Threat Number
(803) 896-9630
- Bureau of Protective Services
(803) 734-2422



Risk Management - Part 3

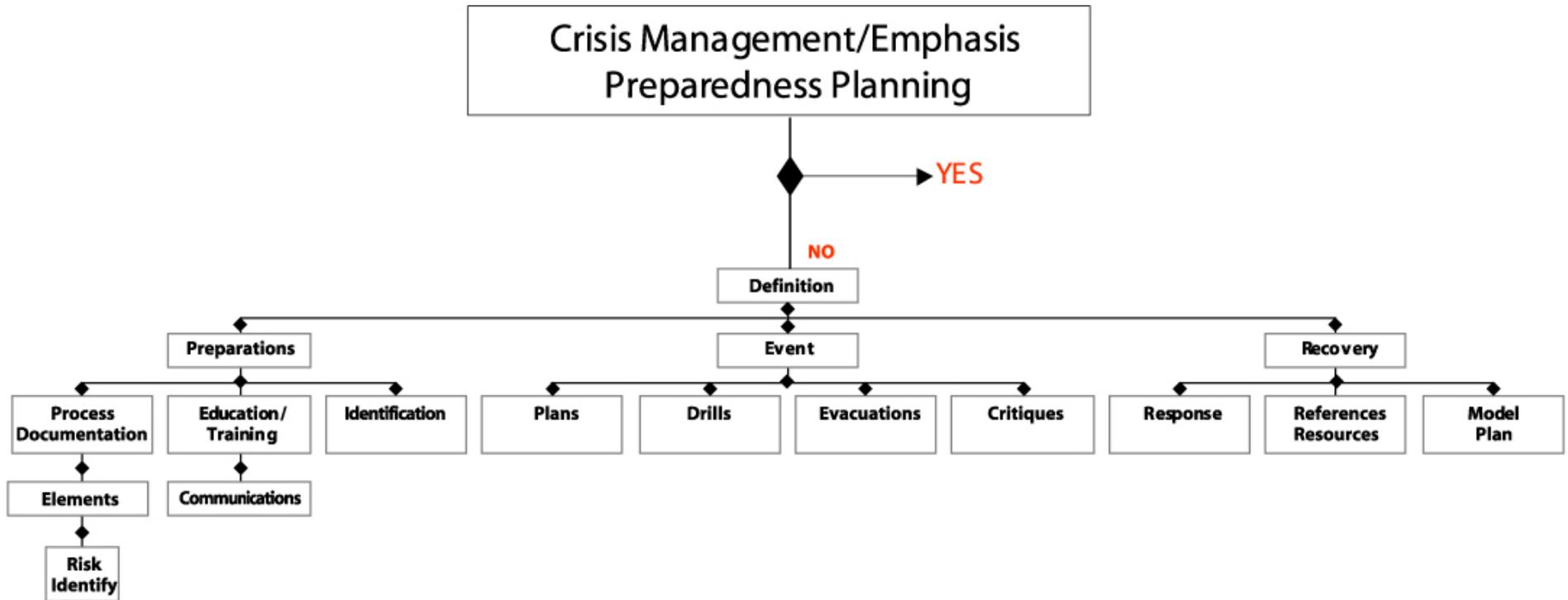
Crisis Management/Emergency Preparedness Planning

Why plan for a crisis or emergency? Planning can help your employees and your business survive and recover from a catastrophic event.

Our survey of South Carolina businesses found that 24 percent of small businesses (1-250 employees) had no written emergency preparedness plan; neither did 20 percent of medium-size companies (251-500 employees). While all large-size companies (501-1,000 employees) had plans, there were still some deficiencies in the plans. The 10 errors most commonly found with emergency response plans include:

1. No upper management support for the plan.
2. Lack of employee buy-in.
3. Poor, or no training of employees on the plan.
4. Lack of practice with the plan.
5. No designated leader in the event of an emergency.
6. Failure to keep the plan up to date.
7. No method of communication to alert employees to an emergency event.
8. OSHA regulations are not part of the plan.
9. No procedures for shutting down critical equipment.
10. Employees are not told what actions to take in the event of an emergency.

The diagram below contains the key elements of Crisis Management/Emergency Preparedness planning:



Emergency Action Plan

The major elements of an Emergency Action Plan are:

- Alarm/notification system
- Escape routes
- Staging/safe areas
- Accounting for all employees
- Training and instructing employees what to do

The employer should list in detail the procedures to be taken by those employees who have been selected and trained to remain behind to care for essential plant operation until their evacuation becomes absolutely necessary. Essential plant operation may include the monitoring of plant power supplies, water supplies, and other essential services, that cannot be shut down for every emergency alarm. Essential plant operations may also include chemical or manufacturing processes that must be shut down in stages or steps where certain employees must be present to assure that safe shut down procedures are completed.

Escape Routes

The use of floor plans or workplace maps that clearly show the emergency escape routes should be included in the Emergency Action Plan. Color-coding will aid employees in determining their route assignments.

The employer should also develop and explain in detail what rescue and medical first-aid duties are to be performed and by whom. All employees are to be told what actions they are to take in these emergency situations that the employer anticipates may occur in the workplace.

At the time of an emergency, employees should know what type of evacuation is necessary and what their role is in carrying out the Emergency Action Plan. In some cases where the emergency is grave, total and immediate evacuation of all employees is necessary. In other emergencies, a partial evacuation of nonessential employees with a delayed evacuation of others may be necessary for continual plant operations. In some cases, only those employees in the immediate area of the emergency may be expected to evacuate or move to a safe area such as when local application fire suppression system discharge employee alarm is sounded. Employees must be sure that they know what is expected of them in all such emergency possibilities that have been planned in order to provide assurance of their safety from fire or other emergency.

Safe Areas

The designation of refuge or safe areas for evacuation should be determined and identified in the plan. In a building divided into fire zones by firewalls, the refuge area may still be within the same building but in a different zone from where the emergency occurs.

Exterior refuge or safe areas may include parking lots, open fields or streets that are located away from the site of the emergency and that provide sufficient space to accommodate the employees. Employees should be instructed to move away from the exit discharge doors of the building and to avoid congregating close to the building where they may hamper emergency operations.

Evacuation Wardens

The employer should assure that an adequate number of employees are available at all times during work hours to act as evacuation wardens so that employees can be swiftly moved from the danger location to the safe areas. Generally, one warden for each twenty (20) employees in the workplace should be able to provide adequate guidance and instructions at the time of the emergency. The employees selected or who volunteer to serve as wardens should be trained in the complete workplace layout and the various alternative escape routes for the workplace. All wardens and fellow employees should be aware of employees with disabilities who may need extra assistance, such as using the buddy system, and hazardous areas to be avoided during emergencies. Before leaving, wardens should check rooms and other enclosed spaces in the work area for employees who may be trapped or otherwise unable to evacuate the area.

After the evacuation is completed, the wardens should be able to account for or otherwise verify that all employees are in the safe areas.

Multi-Employer Settings

In buildings with several places of employment, employers are encouraged to co-ordinate their plans with the other employers in the building. A building-wide or standardized plan for the whole building is acceptable provided that the employer informs their respective employees of their duties and responsibilities under the plan. Each employer in the multi-employer building need not keep the standardized plan provided that there is an accessible location within the building where the plan can be reviewed by affected employees. When multi-employer building-wide plans are not feasible, employers should co-ordinate their plans with other employers within the building to assure conflicts and confusion are avoided during times of emergencies. In multi-story buildings where more than one employer is on a single floor, it is essential that those employers co-ordinate their plans with each other to avoid conflict and confusion.

Use the resources, references and best practices on the next page to help our business and employees prepare, act and recover from a crisis or emergency:

Use the resources and best practices below to help your business and employees prepare, act and recover from a crisis or emergency.

A	B	C
RESOURCES	REFERENCES	BEST PRACTICES
1.American Chemistry Council www.americanchemistry.com	<ul style="list-style-type: none"> • Site Security/Crisis Guidelines for U.S. Chemical Industry • Transportation Guidelines 	<ul style="list-style-type: none"> • Emergency Response & Crisis Management Sample Plans, Policies, Procedures • Emergency Response Plans • Hazard Assessment/Risk Assessment Templates
2.NFPA (National Fire Protection Association) www.NFPA.org	<ul style="list-style-type: none"> • Haz-Mat Response • Bio-Terrorism Threats 	<ul style="list-style-type: none"> • Codes (NFPA #'s)
3.OSHA www.OSHA.gov SC Department of Labor, Licensing and Regulations (LLR) www.LLR.state.sc.us	<ul style="list-style-type: none"> • Technical Links • Emergency Response www.OSHA.slc.gov/sltc/emergencyresponse 	<ul style="list-style-type: none"> • Requirements & Procedures for Emergency Response
4.FEMA (Federal Emergency Management Association) www.FEMA.gov	<ul style="list-style-type: none"> • Exemplary Practices in Emergency Management, Volume IV • Library & Electronic Reading Room FEMA.gov/library/ 	<ul style="list-style-type: none"> • Preparedness & Training • Response & Recovery Response Wheel
5.CDC (Center for Disease Control) www.cdc.gov	<ul style="list-style-type: none"> • Emergency Response Resources www.cdc.gov/niosh/emreso/ 	<ul style="list-style-type: none"> • Bioterrorism • Chemical Hazards • Confined Spaces • Hazardous Waste • Trauma • Etc.
6.EPA (Environmental Protection Agency) www.EPA.gov DHEC SC Department of Health & Environmental Control) www.SCDHEC.net	<ul style="list-style-type: none"> • Chemical Emergency Preparedness & Prevention Office (CEPPO) www.EPA.gov/swercepp/ • Office of Solid Waste & Emergency Response EPA.gov/swerrims/ 	<ul style="list-style-type: none"> • Hazardous Materials Planning Guide • Preventing/Preparing for Chemical Accidents/Oil Spills
7.NSC (National Safety Council) www.NSC.org	<ul style="list-style-type: none"> • Effective Emergency Response Plans www.NSC.org/issues/emer/ssec • On Site Emergency Planning Response Guide www.NSC.org 	<ul style="list-style-type: none"> • Emergency Response Checklist—10 Points • Templates for Emergency Response Plans

A RESOURCES	B REFERENCES	C BEST PRACTICES
8.SCOSC (South Carolina Occupational Safety Council) www.SCOSC.org	<ul style="list-style-type: none"> • www.llr.state.sc.us • www.asse.org • www.dot.gov • www.nfpa.org • www.osha.org • www.cdc.gov 	<ul style="list-style-type: none"> • SCLLR • ASSE • DOT • NFPA • OSHA • CDC
9.U.S. Govt. Printing Office www.bookstore.gpo.gov	<ul style="list-style-type: none"> • Emergency Response Publications Bookstore.gpo.gov/eresponse 	<ul style="list-style-type: none"> • First Response • Medical Emergencies • Emergency Guidelines & Training
10.Emergency Response Planning www.ERPlan.com	<ul style="list-style-type: none"> • State Offices of Emergency Management www.ERPlan.com/resources 	<ul style="list-style-type: none"> • State Agency • Medical Emergencies • Emergency Guidelines & Training
11.National Association of County & City Health Officials www.NACCHO.org	<ul style="list-style-type: none"> • Bioterrorism and emergency response program 	<ul style="list-style-type: none"> • Preparedness & Response to Chemical & Biological Terrorism
12.Search Engine www.FirstGov.gov	<ul style="list-style-type: none"> • Emergency Response 	<ul style="list-style-type: none"> • Fraud • Terrorism • Mail • Bomb Threat • Bio-Terrorism
13.Disaster Preparedness & Emergency Response Association www.DERADisasters.org	<ul style="list-style-type: none"> • Disaster Preparedness & Emergency Response 	<ul style="list-style-type: none"> • Library/Newsletter & Recommended Sites
14.Model Plant Example	<ul style="list-style-type: none"> • Model Crisis Management Plan 	<ul style="list-style-type: none"> • How To? • Templates • Flow Charts • Guidelines • To Do's • What If's

OTHER RESOURCES

DOT (Department of Transportation) www.dot.gov

LAPC's (Local Emergency Planning Committees/Hospitals & Associations

- a) EMS
- b) Emergency Rooms
- c) Doctors
- d) Nurses

American Society of Safety Engineers

South Carolina Law Enforcement (SLED)

Federal Bureau of Investigation (FBI)

See the model crisis management plan in the Appendices on page 36 to prepare a plan for your business.

Appendices



Appendices:

A - Employer Survey	32
B - Model Crisis Management Plan	36
C - Select Agent Rule	65
D- Additional References	68

Appendice A

Employer Survey

January 21, 2002

Re: Homeland Security
Workplace Security Advisory Committee

Dear Colleague:

Following the events of September 11, Governor Jim Hodges appointed a group of government and industry representatives to assist him in designing and implementing the Homeland Security Plan for South Carolina. Part of that effort is the development of a website and other materials which will provide small, medium, and large businesses in South Carolina with assistance and resources in developing their own emergency response and crisis management plans.

One mission of our advisory committee is to survey business leaders like yourself to solicit your input and suggestions as to the type of information you need to develop or update your emergency response plan. Please help us by taking a minute to complete the attached questionnaire containing five short questions so we can be certain the resource material to be provided will meet your needs. Because time is of the essence, a response from you is needed by Thursday, January 31. Please fax or e-mail your response to me at the address listed below at your very earliest convenience.

We expect the website information and other materials to be available to industry prior to the SCOSC annual meeting in April. Thank you very much for your assistance in this very important project. Your input and support are greatly appreciated.

Sincerely,

Wayne Punch

Enclosures: 1. Survey Questionnaire
2. Ten Most Common Errors Found With Emergency Response Plans

Enclosure 1: **CRISIS MANAGEMENT SURVEY QUESTIONNAIRE**

I. **QUESTIONS**

1. How many associates/employees/workers do you have in your company?

2. What is your business/technology/industry? Example: Manufacturing/Textile Products/Sales/Marketing (Products)

3. Do you have a written (documented) Crisis Management/Emergency Preparedness plan? Please check one.

Y N

4. What resources/references would be helpful to you in developing and/or improving your plans?

5. Other comments:

Enclosure 2: TEN MOST COMMON ERRORS FOUND WITH EMERGENCY RESPONSE PLANS

1. No upper management support
2. Lack of employee buy-in
3. Poor or no planning
4. Lack of training and practice
5. No designated leader
6. Failure to keep the plan up to date
7. No method of communication to alert employees

- 8. OSHA regulations are not a part of the plan
- 9. No procedures for shutting down critical equipment
- 10. Employees are not told what actions to take in an emergency

SURVEY RESULTS
CRISIS MANAGEMENT SUBCOMMITTEE
300+ Surveys Sent Out
100+ Surveys Returned By Cutoff Time
30% Response

1) *CO./BUSINESS SIZE*

<u># Associates</u>	<u>% Total Response</u>
0-100	28%
101-250	20%
251-500	23%
501-999	15%
1000→	14%

2) *REPRESENTS INDUSTRIES/TECHNOLOGIES (Etc.)*

Survey Cross Section (Force Ranked)

- Manufacturing
- Utilities
- Construction
- Distribution
- Electric Motor Repair
- Consulting
- Government
- Janitorial Services/Cleaning
- Lumber
- Nursing/Medical
- Printing
- Repackaging
- Telecommunications
- Waste Water Treatment

3) *DO YOU HAVE WRITTEN (DOCUMENTED) CRISIS
MANAGEMENT/EMERGENCY PREPAREDNESS PLAN*

<u>Co. Size</u>	<u>Yes</u>	<u>No</u>
0-100	74%	26%
101-250	77%	23%
251-500	80%	20%
501-999	100%	
1000→	100%	

SURVEY RESULTS
CRISIS MANAGEMENT SUBCOMMITTEE

4) *REFERENCE/RESOURCES NEEDED*
(Force Ranked)

Benchmarking/Networking Industries (Info)
Model Plans
Emergency Phone Nos.
OSHA Regulations (Emergency Preparedness)
County/State Contacts
Education/Training/Drills
References/Resources
Media Contacts
Government Support (Funding)
Websites—Networks—Seminars
Terrorism Potential
3rd Party Security Reviews
Approved Shelters
Newsletters
Localize Notification Systems
When Required to Have Process

Appendix B

Model Crisis Management Plan

A. Introductions, Definitions, and Scope

A.1 Crisis

An incident is an unscheduled undesirable event in the normal course of doing business, which may cause an emergency. An incident is considered major when the site's emergency response team cannot adequately cope with it because of a lack of resources, either manpower or equipment at their disposal, or when the incident has, or could have, serious consequences for the company, the neighborhood, or both. A crisis is the turning point in the course of a major incident when its stage or happenings require decisive actions and crucial timing in order to avoid or minimize: further danger to life, property, or the environment; the possibility of panic among people; or the creation of wrong public perceptions. Examples of major incidents, which can result in crisis, are:

- Rapidly propagating fires
- Explosions
- Fatalities
- Major accidental pollution
- Threats of sabotage
- Terrorism
- Strikes and/or demonstrations
- Major infrastructure failure (loss of power, automation, etc.)
- Workplace violence
- Business interruptions
- Quality problems with products
- Civil unrest

The Chair of the Crisis Committee (Local Emergency Manager - LEM) shall classify these events as one of the following:

LEVEL ONE – An emergency that has the potential for major impact, but does not require the full activation of the Command Center and assembly of all committee members. The primary concerns for a Level One Crisis would be the credibility of the company and the public perception of the event.

LEVEL TWO – An emergency with, not only the potential for major impact, but also one that would require complete activation of the Command Center, and the input of a majority of the Crisis Committee members. The operability, as well as the credibility of the company would be the primary concerns of a Level Two Crisis.

(Both a Level One, and a Level Two, crisis may require the services of various outside agencies.)

A.2 Organization and Procedures

The organization and procedures for responding to emergencies are described in the company's emergency response plan. However, in the event of a major incident, which requires

that the crisis committee be summoned, its mission is to provide for the immediate response and proper/judicial management of the crisis situation with regards to assessment, corrective actions, decisions, and communications.

Section 1.6 provides a general procedure for activation of the committee, as well as a format that may be used as a guide for any committee decisions and actions.

A.3 Crisis Committee

As soon as the crisis committee is activated, it will handle the tasks described in this document. These tasks are described in general terms, since the decisions to be made will depend on the exact nature and magnitude of the incident. The crisis committee shall maintain constant communication with the Incident Commander, monitoring activities and strategic decisions.

This communication capability must be of a nature that will allow committee members with product, or process expertise immediate access to the Incident Commander should a strategic decision result in an action that may precipitate an even greater danger. This may require those committee members to work from the Incident Command Center during crucial periods, acting as technical advisers.

The crisis committee should also understand that their responsibilities cover three distinct time periods.

Pre-Emergency, Emergency, and Recovery

Pre-Emergency activities are those that attempt to prevent an incident from happening, such as assisting in compiling a Site Risk Inventory, and assisting in the completion of employee health risk assessments and job safety analysis. Others would include such activities as assembling a collection of plans, process safety information, drawings, schematics, and detailed site maps. Regular updates of the warehouse chemical and equipment inventory should be maintained. Regularly scheduled training of emergency response teams to maintain competencies and participation in drills are also examples of pre-emergency activities.

Emergency response activities are described in the site emergency response plan, and are activities that work toward incident stabilization and eliminating any threat to people, the environment, property, and external communications.

Recovery activities are those that seek to return the incident scene, and the site, to pre-emergency conditions. These activities are divided into two areas: On-Scene and Operational. On-Scene activities are those performed at the scene of the emergency such as; clean up, product transfer, reopening isolated areas, etc. Operational activities seek to return resources, personnel, and production to pre-emergency conditions and would include such actions as process unit restarts, restocking and resupply of emergency apparatus, release of any mutual aid response units, repairs to machinery, and process equipment, etc.

A.4 Authority of the Committee

In order to be able to react quickly and efficiently, the crisis committee has extended powers. It can take all appropriate measures, including those that normally would require corporate headquarters' approval, when this cannot be obtained in a timely manner.

A.5 Members of the Crisis Committee

The members of the Crisis Management Committee are:

- XXXXX – Site Manager - Local Emergency Manager (LEM)
- XXXXX – Deputy Chairman
- XXXXX – Incident Commander *
- XXXXX – Back-up Incident Commander *
- XXXXX – Security
- XXXXX – Human Resources Director
- XXXXX – Finance
- XXXXX – Quality Control
- XXXXX – Regulatory Compliance
- XXXXX – Laboratory Management
- XXXXX - Process Management
- XXXXX – Engineering
- XXXXX– Maintenance
- XXXXX– Utilities
- XXXXX – Purchasing
- XXXXX – Administrative

* Individuals who will be at the emergency scene, but are considered part of the Crisis Committee

Each member must designate at least one deputy.

Other members as required may assist the crisis committee.

A.6 Crisis Committee Activation

While any member of the committee has the authority to summon the full committee, the most likely scenario would involve a committee member responding to the report of an emergency, and after assessment believes that it may be serious enough to require the committee to take some action.

- Committee member notifies the site emergency notification center of the incident, giving a brief description, and requesting that the Crisis Committee be notified.
The emergency notification center can be contacted by:
 - Radio - XXXX
 - Internal Phone - extension XXX
 - External Phone - XXXXX
- The emergency notification center, using the phone list of committee members they maintain, contacts each member informing them of the situation, and requesting that they report to the Command Center, located in Room XXX of the XXX Building.
- The LEM, after an initial evaluation and discussion, determines whether the incident is Level One, or Level Two.
- Individual committee members begin assignments in their respective areas of responsibility as outlined in the plan. During the emergency phase, and even during recovery these assignments will most likely fall into certain stages, or sequential steps, that form a decision making process designed to help everyone make informed decisions. All members must understand that during an emergency, this process is more cyclical than linear, with the last step feeding more information back into the first, where any changes or refinements can be made. **(Certain actions, however, will have to follow predetermined timelines; such as notification of the respective local, state, and federal agencies as required by law.)**

Decision Making Process

Step One – Gather Information

What has happened? Where? What people and/or products are involved? What processes? What impact will this have on business? This initial step is obvious, but no less critical. Reliable, up-to-date, and accurate information is the key to making informed decisions and the basis for proactive thinking.

Step Two – Estimate Potential Harm

In a worst-case scenario, what will be the impact on the company? If the product is spreading, who is threatened? Has a process area been destroyed, or only interrupted? Without good and reliable information, a wrong decision could be reached.

Step Three – Develop an Action Plan

An Action Plan contains three basic parts; Strategic Goals, Tactical Objectives, and Resources needed. It is often referred to as the What, How, and Who of incident Management.

Step Four – Implement the Plan

Once the LEM has agreed, put the plan into action.

Step Five – Evaluate the Results

Very simple, gather more information to answer one question. Is the plan working?

Step Six – Review/Revise the Plan

Continue to monitor plan performance. Revisions would only be needed if the preceding step determined the Action Plan was either, not working at all, or not as well as expected.

While the emergency response teams are operating in an emergency mode; (i.e. fighting fires, containing spills, performing rescues), the committee's primary role in this area is to support the Incident Commander. During an emergency that has reached a crisis level, however, there will be many actions that will need to be taken early on to ensure business continuity in unaffected areas, and to expedite needed repairs.

The following example looks at how the decision-making process could enable the committee to reach a solution. It only examines one Strategic Goal, in an incident, that most likely would have many such goals.

Example

A leak in a process line in a chemical storage facility found an ignition source resulting in an explosion. The ensuing fire was quickly extinguished by the sprinkler system, but the explosion has heavily damaged three main hazardous material storage tanks for the production area. Emergency crews remain on the scene containing runoff, and securing the area. There were no injuries, and other than piping in the immediate area, no other equipment was damaged.

Gather Information

- Damaged tanks crucial to process operations
- Ancillary storage tanks in an auxiliary chemical storage area are inadequate for full operating capacity of production
- Time to replace damaged tanks, 2 months

Estimate Potential Harm

- Without the chemical storage tanks, production will have to be shut down until repairs are completed
- Critical business plans for the company makes this unacceptable
- Possibility exists that production in other areas will have to be severely scaled back

Develop an Action Plan

Strategic Goal

- Obtain chemical storage capability to enable production to continue operations

Tactical Objectives

- Lease MC-407 tankers from chemical supplier to make up the storage capacity needed, and arrange regular pick-up when full, with delivery of empty replacement tankers

Resources

- Process Management – (Determine chemical storage capacity needed to operate)
- Purchasing – (Arrange leases)
- Maintenance and Utilities – (Make needed changes to piping and unloading procedures to accommodate tankers)
- Engineering – (Manage repair/installation of new tanks, and design piping changes)
- Environmental – (Seek approval and obtain any regulatory permits required, monitor temporary storage for relevant regulatory compliance)
- Safety/Industrial Hygiene – (Monitor all activities for Safety concerns)
- Business Continuity/Recovery – (Evaluate profitability of Action Plan and advise Chairman, monitor plan implementation, track all related costs and any losses for final audit)

Implement the Plan

- Make the calls, obtain the permits, and rework the piping to accommodate tankers

Evaluate the Results

- Is it working? Yes.

Review/Revise

- Continue to monitor tank replacement and temporary waste storage operations

A.7 Command Center

The primary Command Center for the crisis committee shall be in room #XXX of building #XXX. The back up for building #XXX will be the XXX, building #XXX.

Should a decision to relocate the Command Center be made, any member not present should be informed of the new location. Caution should also be made to ensure that the new location has adequate resources to support the committee's activities (i.e. communication capabilities, workspace, relative quiet, supplies, equipment, etc.)

B. Crisis Committee Matrix

The following matrix should be used as a condensed breakdown of the organizational duties and responsibilities of the committee members. A more detailed explanation of these individual responsibilities can be found in the subsequent sections.

CRISIS MANAGEMENT MATRIX

ROLE	LOCATION	DUTIES	SUCCESSION
Local Emergency Manager	Command Center	Overall responsibility for the site. Coordinate and approve any statements to the media. Respond to any requests for assistance and resources from the Incident Commander. Maintain an incident log.	XXXXXX Deputy
Incident Commander	Emergency Scene	Responsible for all Strategic and Tactical decisions related to emergency operations as outlined in the site Emergency Response Plan	XXXXXX Deputy
Security	Command Center	Liaison between site emergency response teams and all outside agency responders. Maintain site integrity during emergency operations. Isolate affected area. Maintain phone lists of team members.	XXXXXX Deputy

ROLE	LOCATION	DUTIES	SUCCESSION
Human Resources	Command Center	Assist LEM with media requests, i.e. preparation of media statement, provide secure area for media representatives, etc. Track, and maintain contact with any injured employee or civilian.	XXXXXX Deputy
Legal	Command Center	Assist LEM with any legal issues related to emergency. Assist Human Resources with preparation of media statement, and/or worker compensation issues.	XXXXXX Deputy
Process Management (Production / Laboratory)	Command Center	Assist LEM with damage assessment. Provide technical advice regarding affected and unaffected process operations. Provide copies of any plans/PIDs needed of affected Areas	XXXXXX Deputy

ROLE	LOCATION	DUTIES	SUCCESSION
Engineering	Command Center	Assist LEM, provide PIDs, drawings, and plans. Assist with damage assessment. Assist Incident Commander with any engineering control problems that may arise. Ensure communication capabilities of Command Post. Manage Recovery operations.	XXXXXX Deputy
Maintenance	Command Center	Assist LEM with damage assessment, and recovery estimates. Provide Purchasing with preliminary estimate of needed materials to begin repairs. Manage replace-in-kind repairs.	XXXXXX Deputy
Utilities	Command Center	Assist LEM. Maintain utilities to unaffected areas on site. Secure utilities to affected area. Assist Incident Commander with any engineering control problems.	XXXXXX Deputy

ROLE	LOCATION	DUTIES	SUCCESSION
Purchasing	Command Center	Work with Maintenance to begin contacts with necessary vendors for repair materials. Assist LEM with purchasing related matters to assist the Incident Commander handle the emergency. Maintain warehouse inventory	XXXXXX Deputy
Business Continuity and Recovery	Command Center	Assist the LEM with impact of upset on business operations. Begin documentation for insurance claims. Initiate concept development for business recovery.	XXXXXX Deputy
Regulatory Compliance	Command Center	Ensure all appropriate regulatory agency notifications are made. Monitor/test all starting materials during upset and Recovery for quality and integrity of materials. Advise LEM of any problems with materials, or end products.	XXXXXX Deputy
ROLE	LOCATION	DUTIES	SUCCESSION
Quality Control	Command Center	Conduct needed tests on any process, or waste, streams affected by the emergency. Work with Regulatory Compliance to verify finished product integrity.	XXXXXX Deputy

C. Crisis Committee Command Center

As stated in section A-7, the Command Center will be located in the XXX building, with the back up being the XXX building. Both these locations provide adequate space, access to multiple computer terminals, and other important logistical support functions. The main assembly areas will be room # in XXX building, and the room #XXX in the back up building.

The Local Emergency Manager shall coordinate the Pre-Emergency activities of the various committee members necessary to ensure that all required documents, supplies, and hardware necessary to operate the center have been provided.

The following are examples of these types of materials:

Documentation

- Organizational charts
- Warehouse Chemical / Equipment Inventory
- Detailed site plans
- Site maps
- Telephone contact lists
- Licenses, legal documents
- Material Safety Data Sheets

Information/Communication/Hardware

- Telephones (Landline, Cellular, Satellite)
- Fax
- Computers
- Radios w/batteries
- Press release checklist

Supplies

- Flip charts
- Overhead projector
- Cameras
- Miscellaneous office supplies

D. Local Emergency Manager Responsibilities

The Chair of the Crisis Committee or his/her deputy will be considered the Local Emergency Manager, (LEM). The LEM shall be the individual with overall responsibility for the site during any event that meets the criteria for a crisis. Generally, the LEM will be the highest ranking site manager. It is understood that the type, magnitude, and nature of the specific incident will dictate the exact duties and actions of the LEM, but the following should be recognized as general duties and responsibilities of the LEM:

Pre-Emergency

- Monitor and coordinate the pre-emergency activities of the other Crisis Committee members to ensure compliance with this document.
- Schedule and conduct regular meetings with the Crisis Committee to ensure that all members are current with their individual duties during each phase, at least on an annual basis.
- Participate in regularly scheduled drills

Emergency

- Respond to, and assume control of the Command Post
- Coordination of, and overall responsibility for, all site response activities
- Ensure that all members of the committee, or their deputies, have been notified
- Provide the Incident Commander with all possible assistance
- Approve all internal (employees) and external (neighbors, news media, etc.) statements prior to their release.
- Ensure that appropriate notifications are made to corporate headquarters
- Ensure that any required notifications, as per local, state, and Federal regulations have been made as outlined in the site emergency response plan.
- Maintain an incident log of activities by site personnel and times.

Recovery

- Follow-up on any injuries, and ensure the well being of any employee or neighbor injured, and their family
- As soon as possible, conduct a preliminary damage assessment to predict when the site will be operational and relay this to the appropriate company headquarters
- Assist the Incident Commander is restoring emergency response teams to pre-emergency status
- Initiate any Recovery plans necessary to resume normal operations

- Ensure that a thorough investigation be conducted, and that actions are taken to prevent a reoccurrence, if possible. (Note: Any actions taken must have some mechanism for follow-up to ensure compliance.)

E. Security Department Responsibilities

The Security Department, and its manager, has the responsibility for implementation and enforcement of all security measures at the site, both administrative and physical, to maintain site integrity and protection of corporate documents during normal operating conditions. During a period of crisis, security will be a vital function, and as a member of the Crisis Committee its Manager shall be responsible for the following:

Pre-Emergency

- Maintain a current list of all Crisis Committee members, and their office and home phone numbers, along with their radio channels
- Maintain a current list of all Fire Brigade, Hazmat Response Team, Confined Space Rescue Team, and Medical First Responders along with their respective radio channels
- Ensure that all members of the Security Department are familiar with their respective responsibilities during a crisis prior to such an occurrence
- Ensure that all members of the Security Department are familiar with the necessary information to be obtained should someone call in a bomb threat, or other threat of a terrorist act.
- Participate in regularly scheduled drills

Emergency

- Serve as a liaison between the Incident Commander and any outside resource that responds to assist emergency teams (Note: This may involve the individual functioning as a combination Liaison/Staging Officer within the site Incident Command System established by the On-Scene Incident Commander.)
- Assist the Incident Commander with isolation of the incident scene
- Continue to maintain site integrity during the emergency
- Ensure that Security Control has begun a call-in of off-duty committee members and/or emergency response team members as directed by either the Local Emergency Manager, or the Incident Commander

Recovery

- Continue to maintain site integrity during Recovery phase
- Continue to serve as a liaison between site emergency response crews and any outside agencies
- In case of an act of terrorism, bomb threat, demonstration, or other act which may involve criminal behavior, begin initial investigation, secure any possible evidence, and provide assistance to local law enforcement as directed by the Local Emergency Manager
- In the previous situation, prepare an internal report for the Local Emergency Manager and the Legal Department, regarding any findings, conclusions, and recommendations.

F. Human Resources Department Responsibilities

During normal operating conditions, the Human Resources Department and its director deals with issues related to personnel -- their health and safety, personal information, and well being in the work place. During a crisis, this emphasis does not change, and as a member of the Crisis Committee, the Human Resource Director, or his/her deputy, shall be responsible for the following:

Pre-Emergency

- Ensure that all department members who may assist the committee, and work during a crisis understand their respective roles
- Become familiar with the procedures for dealing with the media as outlined in the site guide to the news media and crisis communication manual
- Develop local and state media contacts
- Develop a plan for controlling the media representatives when they arrive, i.e. arrange a media room, or some location where announcements and statements can be made
- Make prior arrangement, through Purchasing, to provide food and beverage for response teams and employees at all times
- Participate in regularly scheduled drills

Emergency

- Gather information related to employees who may have been injured
- Gather information about the incident from the Incident Commander and prepare a statement for the media for the LEM to approve
- Make statements to the media as directed by the LEM
- Track and maintain contact with any injured employee, or neighbor, and their family
- Provide food and beverages for response teams and employees
- Insure that the Security Manager establishes a secure area for representatives of the media

Recovery

- Monitor news reports of the incident to ensure accuracy and truthfulness and be prepared to respond to inaccurate or misleading stories
- Keep LEM informed on the progress of any injured employees or neighbors
- Assist the LEM with damage assessment, with an emphasis on personnel issues

G. Legal Department Responsibilities

During normal operations the Legal Department represents the legal interests of the site. During a crisis, the Legal Department Manager, or his/her deputy, would play an important advisory role and the following are the responsibilities of the Legal Department:

Pre-Emergency

- Ensure that the Local Emergency Manager has his/her pager number for after-hour emergencies
- Review plans for consistency and compliance with legal issues
- Determine whether a local attorney should be placed on retainer for immediate on-site assistance during a crisis

Emergency

- Provide advice for the LEM relating to company interests

Recovery

- Represent the interests of the company in any legal matter

H. Process Management Responsibilities

All activity on the site revolves around support of the process systems on the site, and naturally during a crisis, no one should understand better the workings of process operations than the process managers. As members of the Crisis Committee, these managers are responsible for:

Pre-Emergency

- Provide plans, process safety information, drawings, and schematics of each facility for placement in the Command Center
- Assist the Safety and Industrial Hygiene manager in identification of hazard potentials as identified in site process hazard analysis documents and the site risk inventory
- Assist the Safety and Industrial Hygiene manager in completion of employee health risk assessments and job safety analysis
- Participate in regularly scheduled drills

Emergency

- Gather information about the product, containers, and processes to provide to emergency response teams
- Assist the LEM with damage assessment by estimating the impact of the incident on operations
- Estimate the loss of manufacturing capacity
- Make preparations to resume operations after emergency has passed
- Identify process operations not affected by the emergency
- Take necessary steps with respective departments involved for replacement of products and/or facilities involved

Recovery

- Continue efforts to restore operations to involved process systems

I. Engineering Department Responsibilities

During a period of crisis Engineering will play a major role in damage control, damage assessment, and restoration of facilities. As a member of the Crisis Committee, the manager of the Engineering department has the following responsibilities:

Pre-Emergency

- Provide PIDs, drawings, schematics, and plans of all site facilities, not already provided, to the Command Center
- Assist the manager of the Safety and Industrial Hygiene department with identification of hazard potentials as outlined in site process hazard analysis documents and the site risk inventory
- Assist the manager of the Safety and Industrial Hygiene department with completion of employee health risk assessments and job safety analysis
- Participate in regularly scheduled drills

Emergency

- Assist the LEM with damage assessment
- Work with Process Management committee members to make preparations to resume operations
- Assist the Incident Commander with any engineering controls that may help resolve the incident

Recovery

- *Manage any repair/recovery operations*
- *Work closely with Maintenance, Operations, and Utilities to restore process systems affected*
- *Assist investigation with an analysis of all engineering controls, and their Performance*

J. Maintenance Department Responsibilities

During normal operations Maintenance personnel move around the site servicing and repairing the various systems on site. During a time of crisis, this knowledge will be extremely useful to persons attempting to return systems to normal operation, and as a member of the Crisis Committee the Maintenance Manager is responsible for:

Pre-Emergency

- Assess potential Command Center locations for adaptability with portable generator, and make necessary modifications to ensure alternate power in time of crisis
- Assist the manager of Safety and Industrial Hygiene with identification of hazard potentials as outlined in site process hazard analysis documents and the site risk inventory
- Assist Safety and Industrial Hygiene manager in completion of employee health risk assessments and job safety analysis
- Participate in regularly scheduled drills

Emergency

- Assist the LEM with damage assessment
- Ensure back-up generator is supplied to the Command Center location
- Provide purchasing with a preliminary list of needed supplies and materials for repairs
- Call in additional personnel as needed
- Provide maintenance assistance as needed

Recovery

- Begin repairs to process systems and affected areas on site
- Keep the LEM informed of progress in restoration of affected systems

K. Utilities Department Responsibilities

The role of Utilities during normal operations is critical, and during a time of crisis the energy provided can be a hazard to responders and process technicians alike. As a member of the Crisis Committee, the manager of the Utilities department is responsible for:

Pre-Emergency

- Assist the manager of Safety and Industrial Hygiene with identification of hazard potentials as outlined in site process hazard analysis documents and the site risk inventory
- Assist the manager of Safety and Industrial Hygiene in completion of employee health risk assessments and job safety analysis
- Participate in regularly scheduled drills

Emergency

- Assist the LEM with damage assessment
- Secure utilities to affected areas of site, and maintain utilities to unaffected areas
- Assist the Incident Commander with any engineering controls needed to resolve the incident

Recovery

- Work closely with maintenance to restore operations to pre-incident conditions
- Provide LEM with schedule of utilities restoration to affected areas

L. PURCHASING DEPARTMENT RESPONSIBILITIES

While Purchasing may not be thought of as integral during time of crisis, the financial aspects of an incident can be very critical to not only resolution of the emergency, but also recovery of operations. As a member of the Crisis Committee, the Purchasing manager has the following responsibilities:

Pre-Emergency

- Identify key vendors, and sign agreements, to provide various services to the site during all hours, such as food and beverages

- Establish a system to track inventory on a weekly basis (i.e. Warehouse Inventory)

Emergency

- Respond to requests from the LEM for resources needed by the Incident Commander
- Make necessary contacts with previously identified vendors to provide necessary services to responders and employees
- Work with Maintenance to get a list of preliminary materials for recovery operations
- Work with outside vendors to supply equipment, supplies, etc. as needed

Recovery

- Continue to support other departments with emergency purchase requests to restore site to pre-emergency conditions

M. SAFETY AND INDUSTRIAL HYGIENE DEPARTMENT RESPONSIBILITIES

The role of the Safety and Industrial Hygiene Department during the course of normal operations involves many varied responsibilities with perhaps one major goal - The safety and well being of everyone on site. In an industrial setting, working with chemicals, many either toxic or flammable, this responsibility involves constant review of procedures and processes, as well as inspections to insure compliance with the appropriate worker protection regulations in order to prevent even the smallest accident or injury, and reduce the likelihood of any event reaching the potential for a crisis.

It is understood that the Safety and Industrial Hygiene Department has certain key responsibilities during all three phases, or time periods: Pre-emergency, Emergency, and Recovery. During an event that has reached crisis potential, especially one involving chemical leaks, fires, explosions, and accidents involving serious injury and death, the manager of the department will be on the scene of the incident serving in his/her role as the senior response official of the respective emergency response team, along with other key personnel in the department.

Pre-Emergency

- Inspect, and monitor, all areas and processes to assess the hazards associated with each to determine the proper personal protective

equipment and procedure that will, not only be safe, but meet appropriate regulations

- Attend Management of Change meetings to insure any changes made are not only safe, but does not adversely affect safety in other processes
- Attend Process Hazard Review meetings to insure that new processes do not present risks that fall outside acceptable risks on the Risk Profile matrix
- Conduct periodic inspections to ensure all departments comply with various OSHA regulations and company policies for safe work practices
- Conduct regular training sessions on various standards related to worker safety, and review those standards periodically
- Organize, train, and maintain, the various emergency response teams on site to comply with the appropriate regulations, and to respond in a safe and effective manner
- Work with other departments to complete and document all safety and risk assessments as outlined by company policies
- Keep the LEM informed of all activities and progress toward prevention and mitigation of any hazard that may have a crisis potential
- Meet with, and develop mutual aid arrangements, with any outside emergency response organization who may respond to assist in time of crisis
- Ensure the site emergency response plan complies with, and complements, the Local Emergency Operations Plan
- Conduct regularly scheduled drills to ensure Emergency Response Teams and Crisis Committee members are current with the plan, and their respective areas of responsibility. Update the plan as needed.

Emergency

- Respond to the scene of the emergency to organize and coordinate the respective emergency response team as outlined in the site emergency response plan

- Work within a unified command structure with all outside responding agencies, and technical advisers provided by the Crisis Committee
- Keep the LEM informed of incident conditions that may affect the safety of responders and others
- Provide the Crisis Committee with regular updates on incident conditions and any Strategic decisions that may impact on unaffected areas of the facility
- Provide the Crisis Committee with information that may be needed to prepare any press releases

Recovery

- Return the respective emergency response team and equipment to Pre-Emergency status as soon as possible
- Conduct an investigation into the cause, and assist in determining the extent of damage to the site
- Assist the LEM with his/her investigation and actions to prevent a reoccurrence

N. Product Regulatory Compliance Department Responsibilities

During normal operations, the Product Regulatory Compliance Department is responsible for ensuring company compliance with the regulations of the Food and Drug Administration; other international guidelines, and regulatory filings designed to ensure the quality and integrity of all finished product. These responsibilities include the suitability of raw materials, interim processes, and final products.

It is understood that the Product Regulatory Compliance Department has important duties during the time periods for a crisis: pre-emergency, emergency, and recovery. For purposes of this plan, the manager of the Product Regulatory Compliance Department shall have the following responsibilities:

Pre-Emergency

- Regularly review operation practices to assure compliance with approved operating procedures
- Perform audits on a periodic basis, of vendors used for incoming materials to assure suitable practices are in place

- Conduct regular training, both orientation and refresher, for all employees and contractors regarding individual responsibilities for product regulatory compliance issues

Emergency

- Provide secondary input to LEM and Crisis Management Committee on potential impact of various actions on quality of raw materials, interim processes, and final products
- Work within a Unified Command structure to assist in the stabilization of any incident
- Keep the Incident Commander, and the LEM, informed of incident conditions that may have any impact on any product regulatory compliance issue
- Ensure that the Crisis Committee makes appropriate notification to relevant local, state, and federal agencies as required by OSHA, DOT, RCRA and SARA title III, and as outlined in the site emergency response plan.

Recovery

- Provide notification to regulatory bodies, namely FDA on the potential impact of the emergency, the products affected, and when the site will return to normal operations
- Ensure thorough investigation of materials affected and make appropriate alteration, and/or refusal decisions

O. Business Continuity and Recovery

Property damage and/or injuries to people are the direct losses that normally could be encountered during an emergency that has reached the crisis level, and are the losses most people remember. The interruption of production, and business, in some cases could be an even greater loss. Many times this interruption can be minimized, perhaps even avoided if certain key issues are addressed prior to any emergency and others during the early stages, as the incident develops.

The following are the responsibilities of the individual in charge of Business Continuity and Recovery:

Pre-Emergency

- Work with company risk management and third party insurers to develop the necessary procedures, documents, and forms necessary for filing claims
- Develop and maintain a list of persons and organizations, from corporate headquarters to formulation facilities, to be contacted should an emergency cause a business interruption
- Assist Purchasing in the development of a list of key vendors, and review arrangements/contracts with emphasis on ability to provide materials and supplies during an emergency

Emergency

- Contact company risk management and third party insurers once initial evaluation is completed
- Assist the LEM with the business impact assessment of the emergency on operations
- Appoint an individual to maintain all accounting records relative to the costs associated with any losses such as labor, supplies, lost product, and outside contractors
- Contact any independent insurance adjusters to determine if they have any special needs/requirements to properly assess any loss
- Ensure adequate funds are available for emergency materials, labor, and supplies needed for Recovery
- Develop a plan, with rough timeline, for business recovery (Business Recovery Plan)

Recovery

- Implement Business Recovery Plan
- Keep the LEM advised on recovery progress

- Work with Purchasing to coordinate and expedite orders, shipping, and delivery of needed materials and supplies needed for recovery, and track costs
- Audit deliveries to formulation facilities to compare with delivery schedule prior to emergency
- Provide assistance to outside insurance adjusters
- Conduct final audit of costs/losses for presentation to site management

P. Environmental Department Responsibilities

During normal operations, the Environmental Department is responsible for ensuring company compliance with the various State and Federal regulations, permits, and practices adopted to protect the environment. These regulations include many areas critical to the prevention of any accidental releases that may reach crisis potential.

It is understood, that like the Safety and Industrial Hygiene Department, the Environmental Department has many important duties during all three time periods for a crisis: Pre-Emergency, Emergency, and Recovery. For purposes of this plan, the manager of the Environmental Department shall have the following responsibilities:

Pre-Emergency

- Monitor performance of various engineering controls, such as site pollution control devices, on a regular basis to ensure compliance with permits for releases
- Monitor/Inspect 90 Day, and Satellite Accumulation Areas to ensure that all personnel follow prescribed procedures for disposal of solid and liquid wastes
- Perform audits on a periodic basis, as required by permit, on vendors used for transport and disposal of hazardous wastes
- Establish procedures for tracking quantities of all regulated chemicals from delivery, use, and transport/disposal off site

- Conduct regular training, both orientation and refresher, for all employees and contractors regarding individual responsibilities for environmental issues
- Assist Safety and Industrial Hygiene Manager with maintaining preparedness of emergency response teams
- Conduct regularly scheduled drills with an emphasis on environmental risks

Emergency

- Respond to the scene of the emergency as a senior response official as outlined in the site emergency response plan
- Work within a Unified Command structure to assist in the stabilization of any incident
- Keep the Incident Commander, and the LEM, informed of incident conditions that may have any impact on any environment issues
- Ensure that the Crisis Committee makes the appropriate notification to relevant local, state, and federal agencies as required by RCRA and SARA Title III, and as outlined in the site emergency response plan

Recovery

- Monitor and direct all clean-up operations of any spills to comply with various state and federal regulations as outlined in the site emergency response plan
- Ensure all On-Scene Recovery activities comply with OSHA 29 CFR 1910.120 (q) (11)
- Inform the LEM as soon as possible of any releases that may have a negative effect on the site, or may violate any issued permits

Q. Quality Control Department Responsibilities

During normal operations, Quality Control is charged with ensuring that raw materials, intermediate, and finished products meet strict specifications through extensive testing procedures. Additionally, Quality Control must continually monitor the various waste streams generated by production for compliance with environmental permit restrictions.

During a crisis this testing will be just a critical, perhaps more so if there has been a spill, or release, that has the potential of spreading off site. For purposes of this plan, the Quality Control Department has the following responsibilities:

Pre-Emergency

- Establish procedures for emergency field testing protocols of spilled materials should such tests be required

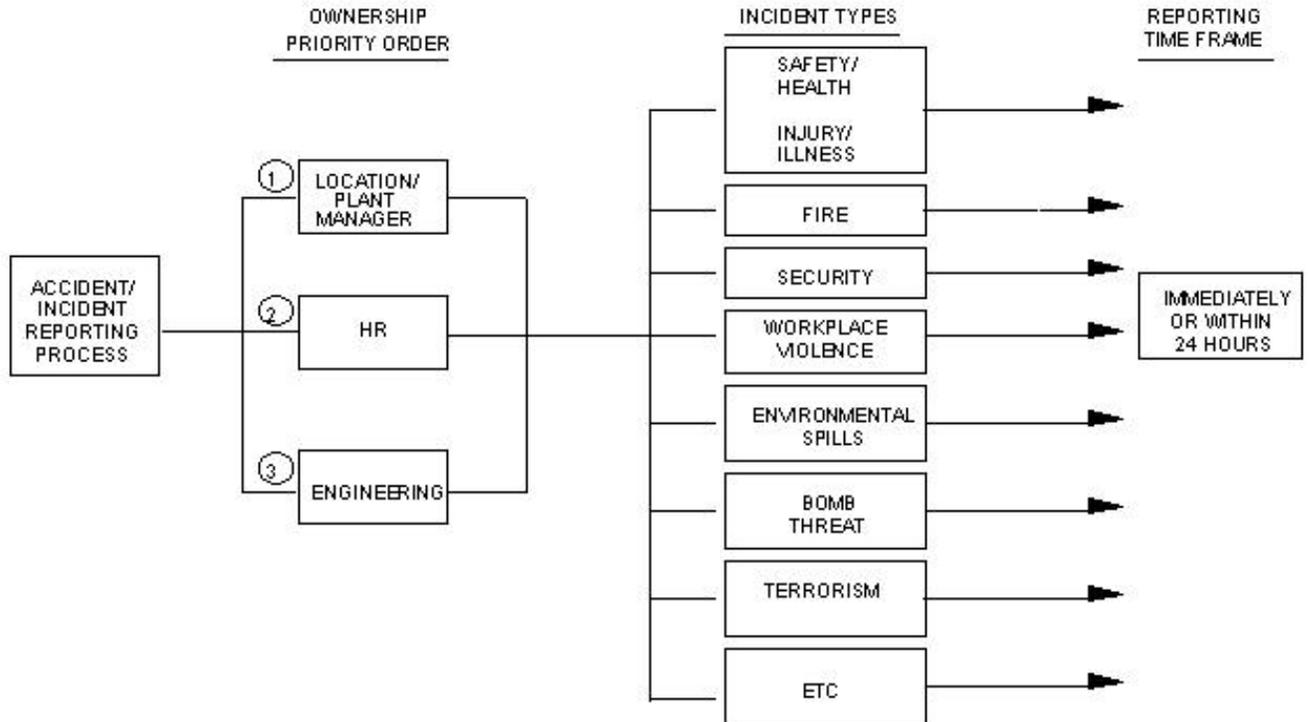
Emergency

- Provide resources needed for all testing requirements on any intermediate or finished products, environmental spills or releases, and any water discharges during the emergency
- Assist Product Regulatory Compliance Manager in determining appropriate tests needed to ensure product integrity during the crisis period
- Assist the Environmental Manager in determining which, if any, waste streams or spills should be monitored for compliance, and conduct tests

Recovery

- Determine if upset requires an increased frequency in the normal testing procedures for raw materials, intermediate and finished products

REPORTING PROCESS FLOW CHARTS CRISIS COMMUNICATION



Appendix C

Select Agents

Agents identified under the HHS and USDA lists of biological select agents and toxins or USDA's list of High Consequence Livestock Pathogens and Toxins have been deemed a potential threat to human, animal, or plant health or animal or plant products. The registration of facilities possessing and using these agents or toxins is part of the government's efforts to improve the ability of the United States to prevent, prepare for, and respond to bioterrorism and other public health emergencies and is required under the Public Health Security and Bioterrorism Preparedness and Response Act of 2002.

HHS and USDA published an interim final rule in the Federal Register (42 CFR 73, December 13, 2002) that describes the new regulations and registration process for both agencies. The new select agent regulation (42 CFR 73) requires that entities **possessing** biological agents that are listed as select agents must register with CDC and/or APHIS and demonstrate compliance with specific safety and security standards for handling these agents. The new regulation also covers **transfer** of select agents.

The new select agent regulation and a listing of HHS select agents and toxins is available at <http://www.cdc.gov/od/sap>.

Appendice - D

Additional References

Homeland Security

- South Carolina Homeland Security www.state.sc.us/homeland
- National Homeland Security www.whitehouse.gov/homeland

Law Enforcement

- State Law Enforcement Division (SLED) www.sled.state.sc.us
- Federal Bureau of Investigation (FBI) www.fbi.gov
- Drug Enforcement Administration (DEA) www.dea.gov
- Highway Patrol Headquarters www.schp.org

Emergency Response

Emergency Management

- Emergency Response Planning www.erplan.com
- Disaster Preparedness & Emergency Response Association www.disasters.org
- National Association of County and City Health Officials www.naccho.org
- Search Engine www.FirstGov.org
- US Government Printing Office www.gpo.gov
- FEMA www.fema.gov
- Emergency Response Resources www.cdc.gov/niosh/emreso.01.html
- EPA (Environmental Protection Agency) www.epa.gov
- SC DHEC www.scdhec.net
- NIOSH www.cdc.gov/niosh/emrandrpt.html

Essential Services

Utility Provider

- A Guide for Small Public Entities www.riskinstitute.org
- SC Municipal Association www.masc.state.sc.us

Food and Drinking

- Food and Drinking Water Safety www.foodsafety.gov

Hazardous Material

Chemicals

- American Industrial Hygiene Association www.aiha.org
- Chemical and Biological Terrorism www.aiha.org
- LLPC and Deliberate Releases www.epa.gov/ceppo
- Transportation Security Guidelines for the U.S. Chemical Industry www.americanchemistry.com/cmaweb site.nsf/s?readform&n nar-54bnk5
- American Chemistry Council www.americanchemistry.com
- OSHA www.OSHA.gov
- SC Department of Labor, Licensing and Regulation www.llr.state.sc.us
- Environmental Protection Agency www.epa.gov
- Site Security/Chemical - <http://www.socma.com>

Biological/Infectious Materials

- List of Select Agents www.cdc.gov/od/ohs/lrsat/42cfr72.htm
- Center for Disease Control www.cdc.gov
- Laboratory Risk Assessment www.phppo.cdc.gov/nltm/pdf/lrawwh.pdf
- Laboratory Security www.cdc.gov/od/ohs/biosfty/bmbl4/b4af.htm
- Transportation and Transfer of Biological Agents www.cdc.gov/od/ohs/biosfty/bmbl4/bmbl4toc.htm
- Workplace Risk Pyramid www.osha.gov/bioterrorism/anthrax/matrix/pyramid.html
- Small Pox Health Information - <http://www.cdc.gov/od/oc/media/>, <http://www.cdc.gov>
- Press Kit on Terrorism - <http://www.cdc.gov/od/oc/media/9-11pk.htm>
- DHEC – www.scdhec.net/CO/ELSA/elsachem.htm

Radioactive Materials

- US Nuclear Regulatory Commission Brochures www.nrc.gov/reading-rm.html
- Protecting Building Environments from Airborne Chemical, Biological, or Radiological Attacks – www.cdc.gov/niosh
- Indoor Air Quality – www.asse.org or www.ASHRAE.org

Explosives

- Federal Explosives Laws and Regulations www.atf.treas.gov
- Security for fertilizer manufacturers www.atf.treas.gov

Transportation

Trucking

- Hazmat safety <http://hazmat.dot.gov/>
- Risk Management for the Safe Transportation of Hazardous Materials <http://hazmat.dot.gov/risk.htm>
- Nuclear Materials Transportation www.nrc.gov/materials/transportation.html
- US Nuclear Regulatory Commission Brochures www.nrc.gov/reading-rm/doc-collections/nuregs/brochures/
- SC Department of Transportation www.dot.state.sc.us

Shipyard/Port/Cruise Ships

- US Coast Guard www.uscg.mil/

Airlines

- Federal Aviation Administration www.FAA.gov

Incoming Materials

- Suspicious Mail and Packages www.fbi.gov/pressrel/pressrel01/mail3.pdf

Engineers/Contractors

- American Society of Safety Engineers www.asse.org
- Association of General Contractors (AGC) www.cagc.org
- NCS (National Safety Council) www.NSC.org

Insurance/Workers' Compensation

- SC Workers' Compensation Commission www.wcc.state.sc.us/
- SC Department of Insurance www.state.sc.us/doi

Safety

- National Safety Council www.nsc.org
- SC Occupational Safety Council www.scosc.org

Misc.

- Cal/OHSA's Workplace Violence
http://165.235.90.100/DOSH/dosh_publications/worksecurity.html
- City of Richmond, British Columbia
<http://www.city.richmond.bc.ca/emergency/police/cpbook/cp11.htm>