

### ENVIRONMENTAL NOTES

**SUMMER 2005** 

# TOP TEN PROCEDURES AND PREPARATIONS FOR EMERGENCY RESPONSE PLANNING

**AND IMPLEMENTATION** 

### 1. Establish a well-defined Emergency Response Plan (ERP)

- Check ERP to ensure compliance with regulations and standards
- Involve various plant disciplines in the ERP such as operations, management, medical, industrial, hygiene, safety, environmental
- Take recommendations for improvements from various plant sectors

## 2. Ensure the company personnel are familiarized and trained to carry out the ERP

• Perform fire drills and run simulated release scenarios

#### 3. Update the ERP in response to changes in operations, state and federal regulations, etc.

#### 4. Coordinate and plan post-incident investigation

- Evaluate system policies and the effects of spoliation issues
- Review electronic security and policies
- Appropriate use of attorney-client privilege

5. Stress importance of proper report-writing technique

- All observations and conclusions should be factual
- Committee opinions and beliefs based on circumstantial evidence should not be stated
- Recommendations should be limited to those which have a direct bearing on the incident in question
- All documents and emails are most likely discoverable and may be used in court

## 6. Update management on facility maintenance and operational safety procedures

- Train employees on writing reports and keeping accurate files
- Install professional systems and a safety audit

#### 7. Establish accurate procedures for communication with state and federal authorities

- Review calculations and reporting procedure – Peer review system
- Library of materials for calculations
- Emphasize wording and language of report
- Train personnel on importance of accurate documentation

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BATON ROUGE New Orleans Lake Charles Plaquemine KEANMILLER.COM 8. Establish effective and accurate lines of communication with community

- Identify and train spokespeople
- Establish lines of communication with security personnel
- Review community alert systems and warning systems for neighboring plants
- Retain media consultant

9. Mitigate severe health consequences immediately

- Have an on-site toxicologist / industrial hygienist
- Review and audit MSDS's
- Train emergency responders and update plant medical personnel

10. Install chemical monitoring equipment; map and trace hazardous concentration of released chemicals

- Pre-mapped demographic information of surrounding area
- Procedure for obtaining meteorological data
- Pre-established monitoring points correlated to meteorological data
- Plan for necessary monitoring equipment/acquisition of data

Karli Glascock Wilson 225.389.3704 karli.wilson@keanmiller.com





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