



A Fact Sheet prepared by the National Telecommunications Safety Panel

Introduction

A site Health and Safety Plan (HASP) describes the potential hazards of the work site, along with all company policies, controls and work practices selected to minimize those hazards.

What Are the Benefits of Preparing a Site HASP?

OSHA does not require a written comprehensive Health and Safety Plan for emergency disaster operations, but does require that employees and their supervisors be trained in the specific hazards and control measures associated with their assigned tasks. The written Health and Safety Plan is a valuable tool in providing this training. Other benefits include identifying needed PPE, providing emergency procedures, etc.

What OSHA Regulation Can Be Used as a Guide in Developing a HASP for Disaster Operations?

OSHA 29CFR.120 is not required but can be used as a model program.

What is a "Site"?

In a natural disaster such as a hurricane or an earthquake, the disaster site can be very large. The application of the word site is best managed by breaking up the large area into manageable sites based on specific hazards in the site (e.g. residential, commercial, industrial, etc.). Alternately the whole disaster area can be considered a site if the hazards are considered to be homogeneous throughout.

What Are the Standard Components of a Health and Safety Site Plan?

Note: this information is modeled after 29 CFR 1910.120

Key Personnel and Organization

The health and safety program organizational structure must show how a chain of command is established, specify responsibilities of all on site, and establish a clear line of authority and communication necessary to ensure the implementation and enforcement of health and safety rules.

- Designate someone as Site Health and Safety Officer (SHSO), who ideally would report to the Incident Commander, or equivalent.
- The SHSO should appoint assistants as needed to complete the tasks of the Site Health and Safety Plan. Responsibilities could include:
 - Completes/facilitates the HASP/checklist
 - Conducts a Job Health and Safety analysis to identify hazards and implement exposures controls
 - Ensure hazard controls are implemented

- Manage related health and safety contractors
- Participate in planning meetings to identify any environmental, health, and/or safety concerns inherent to the daily operations or work plan.
- Exercise emergency authority to prevent or stop unsafe acts in imminent danger situations.
- Serve as liaison for Federal, State, and Local regulatory safety and environmental agencies.

Information about the Site

Site Characterization

- Location and approximate size of the site.
- Description of the response activity and/or the job task to be performed.
- Duration of the planned employee activity.
- Site topography and accessibility by air and roads.
- Health and safety hazards expected at the site.
- Pathways for hazardous substance dispersion.
- Present status and capabilities of emergency response teams that would provide assistance to on-site employees at the time of an emergency.
- Hazardous substances and health hazards involved or expected at the site and their chemical and physical properties.

Hazard Analysis

- A preliminary evaluation of a site's characteristics using a Job Safety and Health Analysis (JSHA) is performed prior to entry into the disaster area.
- Immediately after initial site entry, a more detailed JSHA of the site's specific characteristics is performed in order to further identify existing site hazards.
- From the information analyzed in a JSHA, personal protection equipment is selected, appropriate air monitoring is developed and notification and training of workers is completed.

Description of Work to be Performed

- The comprehensive work plan part of the program defines the tasks and objectives of site operations and resources needed to meet goals.
- It must address anticipated disaster cleanup activities and normal operating procedures.
- The work plan will also define work tasks, identify the methods for accomplishing the tasks, establish personnel requirements for implementing the plan, and provide for implementation of training, informational, and medical surveillance program.

Site control

- In a large disaster, site control is maintained by responding agencies such as emergency responders, FEMA, etc.

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Site Health and Safety Plan For Disaster Recovery, continued

- Although these methods will be in place, it is appropriate that each responding telecommunications company develop procedures to prevent unauthorized entry to a disaster work site and subsequent inadvertent exposure of field personnel, visitors, and the public to hazardous conditions.
- Elements of the site control program are: a site map, site work zones, methods of restricting access to the disaster area, use of a buddy system, site communications-including an alarm system for emergencies, and the location of the nearest medical assistance.

Communication

Describe the methods of communication that should be used at the site. This could include telephones, cell phones, two-way radios, and other forms of communication equipment that apply to this site.

Medical Surveillance

Medical surveillance may be required if a respirator is required as a part of personal protection equipment. Voluntary use of respirators by workers will not have to comply with medical surveillance requirements. For information on medical surveillance see 29 CFR 1910.120(f).

Engineering controls, work practices, and PPE

These controls must be implemented to protect workers from exposure to health hazards and hazardous substances.

General Safety Rules

It is always good to establish parameters for safe behavior at a site. These could include:

- No one goes in the work zone without proper training, PPE, and tools.
- The buddy system will always be used.
- Use of hand signals will be utilized when verbal communication is not possible.
- No horseplay in and around the site.

Procedures

Include reference or attach standard operating procedures as well as other written programs that would apply to the site such as:

- Hearing Conservation Program
- Respiratory Protection Program (noted above)
- Lockout/Tagout Procedures (noted above)
- Hazard Communication Program

PPE

Traditional PPE such as hard hats, safety glasses, gloves, and safety shoes should be worn, as appropriate, when working in the hazard zone. Selection of additional PPE, such as respirators and protective clothing should be selected based on the specific chemical or biological hazards at the site and only as the last resort for controlling hazards at the site.

Training

All employees working on site that are exposed to hazardous substances, health hazards, or safety hazards must receive training before being allowed to work at the site.

Elements to be covered:

- Safety, health, and other hazards present on the site;
- Use of PPE;

- Work practices by which the employee can minimize risks from hazards;
- Recognition of symptoms and signs which might indicate overexposure to hazards.

Monitoring

Monitoring must be performed where there is a question about worker exposure to hazardous concentrations of hazardous substances in order to ensure that proper engineering controls and PPE are used.

Decontamination

A decontamination procedure must be developed, communicated to employees, and implemented before any employees or equipment may enter areas on-site where potential for exposure to hazardous substances exists. In a disaster this may only need to be implemented on a short term basis, depending on the nature of the hazard.

Emergency Safety and Response Plan

This plan provides the plan for safeguarding personnel during the initial emergency phase of the response. Elements should include:

- Pre-emergency planning and coordination with outside parties
- Personnel roles, lines of authority, and communication
- Emergency recognition and prevention
- Safe distances and places of refuge
- Evacuation routes and procedures
- Decontamination procedures
- Emergency medical treatment and first aid
- Emergency alerting and response procedures
- Critique of response and follow-up
- PPE and emergency equipment
- As needed, specific response actions for fire, weather related, earthquakes, etc may be developed.

Coverage on the Plan

Each site worker should be trained on the elements of the site plan and sign off on a page provided.

Additional Information

- **OSHA HAZWOPER 1910.120**
<http://www.osha.gov/SLTC/hazardouswaste/index.html>
- **Keeping Workers Safe During Clean Up and Recovery Operations Following Hurricanes**
<http://www.osha.gov/OshDoc/hurricaneRecovery.html#fact>
- **HEALTH AND SAFETY PLAN for Protection Against Environmental Contaminants at Deutsche Bank Building (after 9/11)**
http://www.nycosh.org/environment_wtc/RJLeeSafetyPlan.pdf

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