

MANUAL #1

THE HAZARDOUS MATERIALS, SUBSTANCES AND WASTES PANDEMIC PREPAREDNESS AND PREVENTION PLAN

**This guidance is not a standard or regulation, and it creates no new legal obligations. It contains recommendations as well as descriptions of mandatory safety and health standards. The recommendations are advisory in nature, informational in content, and are intended to assist employers in providing a safe and healthful workplace. The Occupational Safety and Health Act requires employers to comply with safety and health standards and regulations promulgated by OSHA or by a state with an OSHA-approved state plan. In addition, the Act's General Duty Clause, Section 5(a)(1), requires employers to provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm.

CHOOSE A PANDEMIC EVENT PREPAREDNESS PLAN

The Pandemic Preparedness and Prevention Manual has been developed to align closely with the National Response Team's Integrated Contingency Plan Guidance "One Plan", in which Occupational Safety and Health Administration (OSHA), Environmental Protection Agency (EPA), Pipeline and Hazardous Materials Safety Administration, U.S. Coast Guard (USCG) and Minerals Management Service (MMS) have compiled to cross reference all their preparedness and prevention planning.

Visit the National Response Team Integrated Contingency Plan Guidance "One plan" see link:

<https://www.nrt.org/sites/2/files/NRT>

Visit the OSHA Guidance on Preparing Workplaces for Covid-19:

<https://static1.squarespace.com/static/5abcf9ebb27e39fa345f80d5/t/5e7b8bfc271d833d69f80c20/1585155069969/OSHA3990.pdf>

Take Action

1. **Make your own separate Pandemic Preparedness Prevention Plan and Training Program using this manual and the “One Plan” as the Basic framework;**
2. **Use the references (ie, Section III- Annexes 3: Annex 2), from the NRT “One Plan” in the checklist listed below, to find the areas in your current One Plan where the information should be entered. This will ensure the critical Pandemic information will be properly included into a updated One Plan, or;**
3. **Write a brand new “One Plan” if you do not already have one and use the references below to add critical Pandemic information to your new “One Plan”. This will ensure the critical Pandemic information will be properly included into the new One Plan.**

PANDEMIC PLANNING AND PREPAREDNESS PLAN CRITERIA AND THEIR DOT EPA and OSHA ‘ ONE PLAN’ CROSS REFERENCES

1: Plan for maintaining business continuity during and after a pandemic

- ☐ **Select a pandemic coordinator at every facility** to oversee local planning and implementation processes, threat assessment and related financial considerations, and coordinate with headquarters. Ensure local pandemic coordinator is in communication with the organization’s overall pandemic coordinator on an ongoing basis. (Section I-Plan Introduction Elements: 4g, Section II-Core Plan Elements: 2, Section III-Annexes: Annex 2 and 3)
- ☐ **Establish pandemic planning and implementation team(s) at every facility**, including chain of command, with clearly defined roles, responsibilities, and authorities. Establish lines of communication and authority within the overall organization. (Section I-Plan Introduction Elements, Section III - Annexes: Annex 2 and 3)
- ☐ **Understand national and local governments’ policies** and the potential impact they may have on your business operations and emergency plans. (**Monitor government press releases/websites for possible mandated regional/state/country closure and/or Stay Home advisements**) (Section II -Core Plan Elements: 2a, Section III-Annexes 3: Annex 2)

- ❑ Analyze the capability of national and local governments to provide assistance to your company and employees. (**Government business loans and Payroll Assistance type loans**) (Section III- Annexes: Annex 3 e5 and f1)
- ❑ Prepare for the possibility/impact of a currency devaluation on your business operations during a pandemic. (Section III-Annexes: Annex 3d)

Monitor the status of pandemic as reported through the World Health Organization (WHO) and other official sources.

- ❑ Identify circumstances under which business **may be forced to close or reduce levels of service**. (Section III- Annexes: Annex 3d)
- ❑ **Identify essential employees and other critical inputs** (e.g., raw materials, suppliers, subcontractor services/products and logistics) required to maintain critical business operations by location and function during a pandemic. (Section III- Annexes: Annex 3 b1 and f2)
- ❑ **Identify potential pandemic effects** on supply chain and shipments, particularly if the organization uses “just-in-time” delivery. (Section III- Annexes: Annex 3 d1 and e6)
- ❑ **Work with suppliers and clients** to ensure all pandemic plans work together to maintain business continuity in the event of transportation or distribution disruptions in accordance with priorities and critical needs. (Section III- Annexes: Annex 3d and e)
- ❑ **Identify and develop a plan to augment the current workforce capability** (e.g., engaging temporary workers, contractors and retirees, and/or cross-training the existing workforce) with special attention to redundant staffing of critical business operations. (Section III- Annexes: Annex 3d,e and f2)
- ❑ **Identify business functions** that could be outsourced or transferred to other facilities within the organization in the event of high employee absenteeism. (Section III- Annexes: Annex 3d,e and f)
- ❑ **Review business insurance policies** to determine what coverage may be necessary to mitigate the country-specific risks and effects of a pandemic. (Section III - Annexes: Annex 3 f1)
- ❑ **Test plans** through regular exercises and revise plans on a periodic basis. (Section III- Annexes: Annex 5 and 6)

2: Plan for the impact of a pandemic on the lives and welfare of your employees

- ❑ **Understand local and national health policies and plans** regarding possible quarantines, border closures, airport closures, school closures, and transportation closures. (Section III- Annexes: Annex 2, Annex 3 e and f)
- ❑ **Forecast and allow for employee absences** during a pandemic due to factors such as personal illness, mental health needs, family member illness, community containment measures and quarantines, school and/or business closures, and public transportation closures. (Section III-Annexes: Annex 3 e and f)
- ❑ **Ensure staffing plans** have sufficient redundancy to allow for anticipated absenteeism, and crosstrain employees to fill essential vacancies that might occur. (Section III- Annexes: Annex 3 e and f)
- ❑ **Review and analyze labor laws** that determine your obligations to personnel. (Section- III Annexes: Annex 3 e and f)
- ❑ **Identify employees with special health or other needs** and incorporate the requirements of such persons into your preparedness plan. (Section III- Annexes: Annex 3 e1)
- ❑ **Encourage annual seasonal influenza vaccination** for appropriate employees using local public health guidelines. (Section III - Annexes: Annex 7)
- ❑ **Assess availability** of medical advice, healthcare, prescription medications, mental health services, social services, and other support services (e.g., alternate transportation, meals, grief counseling) for employees during a pandemic. If needed, consider supplementing local resources with organizational ones. (Section III- Annexes: Annex 3 e1 and 5)
- ❑ **Review business health insurance policies** to determine what coverage may be necessary to mitigate the risks and effects of a pandemic, and assess whether changes are needed in employee health coverage. (Section III - Annexes: Annex 3 f1 and 6)
- ❑ **Assess potential availability of a pandemic vaccine**, determine its reliability, and plan for its distribution during a pandemic. (Section III - Annexes: Annex 3 1and 5, Annex 7)
- ❑ **Evaluate need** for antiviral medications and plan for access, storage, dispensing by medical personnel, and distribution consistent with local laws and regulations.

(Section III- Annexes: Annex 3 1and 5, Annex 7)

- ☐ **Remind employees** that normal supply lines may be slowed or inoperable for an extended period of time and to make personal preparations for pandemic for up to 12 weeks (e.g., stockpiling food, water, and prescription drugs).
(Section III- Annexes: Annex 3 e5 and e6, f2)

3: Establish policies and guidelines to be implemented during a pandemic to avoid creating policies “on demand” in the midst of a pandemic

- ☐ **Establish triggers** and set up procedures for activating and terminating the company’s response plan. (Section II- Core Plan Elements: 1 and 2, Section III- Annexes: Annex 2)
- ☐ **Establish a security plan** that includes personnel, asset, and infrastructure protection. Prepare for the possibility of social/security breakdown. (Section II- Core Plan Elements: 2, Section III- Annexes: Annex 3 e2)
- ☐ **Align business policies** with national and local labor laws. (Section II- Core Plan Elements: 1 and 2, Section III- Annexes: Annex 2)
(check updates by local/state/national government agencies)
- ☐ **Develop and create guidelines for the possible downsizing and evacuation** of expatriate employees and families. Guidelines should identify multiple evacuation locations. (Section III - Annexes: Annex 3 d1 and f)
- ☐ **Develop policies for restricting travel** (domestic and international) to affected areas and guidance for employees or visitors returning from affected areas. (Section III- Annexes: Annex 3 e4 and 5)
- ☐ **Develop options** for conducting safer customer contacts in the event of pandemic. (Section III- Annexes: Annex 3 e3)
- ☐ **Develop guidelines to prevent influenza spread at worksite**, including facility cleaning and disinfection and social distancing methods to modify frequency and type of contact (e.g., reducing hand-shaking, limiting face-to-face meetings and shared workstations, promoting telecommuting, liberal leave policies, etc.). (Section III- Annexes: Annex 7)

- ❑ **Develop guidelines** to inform and address needs of employees whose jobs will not allow telework (e.g., production or assembly-line workers). (Section III-Annexes: Annex 3 e4,5 and 6)
- ❑ **Establish and clearly communicate policies** on sick leave, family leave, and employee compensation. Advise employees who are ill with influenza during a pandemic to stay home from work. (Section III-Annexes 3: Annex 2a, Annex 5)
- ❑ **Develop or expand guidelines for conducting business online** with customers and suppliers, allowing self-service when possible. (Section III-Annexes: Annex 3 d,e,f)
- ❑ **Provide policies and training for employees** in the use of personal protective equipment (PPE) when necessary. (Section III-Annexes: Annex 2 and Annex 5)
- ❑ **Determine the need** and arrange for appropriate Personal Protective Equipment (PPE) based on WHO and CDC recommendations and provide necessary training.
(Reference OSHA 1910 Subpart I- Personal Protective Equipment)
(Section III-Annexes: Annex 3 e4,5, 6 and Annex 5)
- ❑ **Develop culturally and linguistically appropriate educational guidelines** on modes of influenza transmission, signs and symptoms of infection, basic infection control procedures (e.g., good hand hygiene, cough etiquette, distancing etc.), contingency plans, and travel awareness. (Section III-Annexes: Annex 7)
- ❑ **Establish policies for alternate or flexible worksites** (e.g., videoconferencing and telecommuting) and work hours.(Section III-Annexes: Annex 3 d1, e4,5, 6 and f)

4: Determine resources required to fulfill actions in your pandemic plan

- ❑ **Maintain a contact list of current suppliers and develop an alternate list** of suppliers for critical supplies and essential resources and services. (Section III-Annexes: Annex 3 d1, e4,5,6 and f)
- ❑ **Maintain sufficient and accessible, infection control supplies** (e.g., hand-hygiene products, tissues, receptacles for their disposal, surgical masks, disinfectant cleaners and thermometers) at all business locations based on WHO and CDC recommendations at time of pandemic. (Section III-Annexes: Annex 3 d2, e5,6 and f3)
- ❑ **Ensure availability of medical consultations** and advice for emergency response. (Section III-Annexes: Annex 4, Annex 6)

- ❑ **Enhance communications and information technology infrastructure** as needed to support telecommuting and remote employee and customer access. (Section III-Annexes: Annex 3 e3 and f3)
- ❑ **Work with local law enforcement and security firms to develop security plans** to protect operations, facilities, etc. in need of temporary shut down/closure of your facility. (Section III-Annexes: Annex 3 f5)

5: Create an emergency communications system

- ❑ **Disseminate pandemic plan** to all employees and stakeholders in advance of a pandemic, including expected roles/actions for employees and other stakeholders during implementation.(Section III-Annexes: Annex 2)
- ❑ **Maintain current contact information** for staff, ancillary personnel, clients, and other stakeholders. (Section1-Plan Introduction Elements: f and g)
- ❑ **Anticipate** employee fear, anxiety, rumors and misinformation. (Section III-Annexes: Annex 7)
- ❑ **Ensure** that communications are culturally and linguistically appropriate. (Appendix 2 and Appendix 5)
- ❑ **Develop 24/7 means (e.g. hotline, dedicated website) for communicating** pandemic status updates/ actions to employees and service delivery news to vendors and customers. (Section III-Annexes: Annex 3 e3 and f2)
- ❑ **Develop alternate forms of communication** (e.g., cell phones, pagers, and other processes, etc.). (Section III Annexes: Annex 3 e3, f3 and 4)
- ❑ **Disseminate information** for at-home care of ill employees and family members. (Section III- Annexes: Annex 2 e3, e5 and f2)
- ❑ **Establish system** to account for employee status (e.g. dial-in system) (Section III-Annexes: Annex 3 f2)

6: Prepare for post-pandemic scenarios

- ☐ **Assess ability and criteria** that need to be met to resume normal operations and provide notification of activation of the business resumption plan. (Section III-Annexes : Annex 3 d1, e5, f1,2,3,4 and 5)
- ☐ **Assess availability/need** of medical, mental health, and social services for employees after the pandemic. (Section III-Annexes: Annex 3 e1 and e5)
- ☐ **Conduct a post-pandemic review of response**(both positive and negative) and revise current plan as needed. (Appendix 6)
- ☐ **Prepare** for possible follow-on pandemic waves. (Section III-Annexes: Annex7)
- ☐ **Replenish** any PPE deemed necessary to keep in event of another pandemic.
****Please note stockpiling is not suggested.** (Section III-Annexes : Annex 3 d1,2 and 4, e1,4,5 and 6, f3)

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Section I - Plan Introduction Elements

1. Purpose and Scope of Plan Coverage
2. Table of Contents
3. Current Revision Date
4. General Facility Identification Information
 - a. Facility name
 - b. Owner/operator/agent (include physical and mailing address and phone number)

- c. Physical address of the facility (include county/parish/borough, latitude/longitude, and directions)
- d. Mailing address of the facility (correspondence contact)
- e. Other identifying information (e.g., ID numbers, SIC Code, oil storage start-up date)
- f. Key contact(s) for plan development and maintenance
- g. Phone number for key contact(s)
- h. Facility phone number
- i. Facility fax number

Section II - Core Plan Elements

1. Discovery

2. Initial Response

- a. Procedures for internal and external notifications (i.e., contact, organization name, and phone number of facility emergency response coordinator, facility response team personnel, federal, state, and local officials)
- b. Establishment of a response management system
- c. Procedures for preliminary assessment of the situation, including an identification of incident type, hazards involved, magnitude of the problem, and resources threatened
- d. Procedures for establishment of objectives and priorities for response to the specific incident, including:
 - 1. Immediate goals/tactical planning (e.g., protection of workers and public as priorities)
 - 2. Mitigating actions (e.g., discharge/release control, containment, and recovery, as appropriate)
 - 3. Identification of resources required for response
- e. Procedures for implementation of tactical plan
- f. Procedure for mobilization of resources

3. Sustained Actions

4. Termination and Follow-Up Actions

Section III - Annexes

Annex 1. Facility and Locality Information

- a. Facility maps
- b. Facility drawings
- c. Facility description/layout, including identification of facility hazards and vulnerable resources and populations on and off the facility which may be impacted by an incident

Annex 2. Notification

- a. Internal notifications**
- b. Community notifications**
- c. Federal and state agency notifications**

Annex 3. Response Management System

- a. General**
- b. Command**
 - 1. List facility Incident Commander and Qualified Individual (if applicable) by name and/or title and provide information on their authorities and duties**
 - 2. Information (i.e., internal and external communications)**
 - 3. Safety**
 - 4. Liaison - Staff mobilization**
- c. Operations**
 - 1. Operational response objectives**
 - 2. Discharge or release control**
 - 3. Assessment/monitoring**
 - 4. Containment**
 - 5. Recovery**
 - 6. Decontamination**
 - 7. Non-responder medical needs including information on ambulances and hospitals**
 - 8. Salvage plans**
- d. Planning**
 - 1. Hazard assessment, including facility hazards identification, vulnerability analysis, prioritization of potential risks**
 - 2. Protection**
 - 3. Coordination with natural resource trustees**
 - 4. Waste management**
- e. Logistics**
 - 1. Medical needs of responders**
 - 2. Site security**
 - 3. Communications (internal and external resources)**
 - 4. Transportation (air, land, water)**
 - 5. Personnel support (e.g., meals, housing, equipment)**
 - 6. Equipment maintenance and support**
- f. Finance/procurement/administration**
 - 1. Resource list**
 - 2. Personnel management**
 - 3. Response equipment**
 - 4. Support equipment**
 - 5. Contracting**

- 6. Claims procedures
- 7. Cost documentation

Annex 4. Incident Documentation

- a. Post accident investigation
- b. Incident history

Annex 5. Training and Exercises/Drills

Annex 6. Response Critique and Plan Review and Modification Process

Annex 7. Prevention

Annex 8. Regulatory Compliance and Cross-Reference Matrices

Link to other page

**** Remember to always check the most recent updates from government agencies(CDC, WHO, OSHA, as well as state and local agencies) for the most up to date information to better assist you with your planning endeavors.**

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