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Maine Department of Labor

Maine Bureau of Labor Standards

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Planning For the Worst

One company's search for the best method of protecting and accounting for all of its employees and visitors in a worst case scenario

By Bob Leclerc

It began in 1991 with the need for the installation of an evacuation alarm system. It reached fruition on September 11, 1996, with a coordinated Emergency Response Drill which involved a full evacuation of our mill and multi-disciplinary responses to simulated emergencies throughout our mill. This was our planning for a worst case emergency situation.

In early 1992, we established a committee to develop an evacuation system for our mill. We wanted a system that would truly work in an emergency. This group developed a plan and we began putting the plan to test in the Spring of 1994. Testing reached culmination with a full evacuation of our mill in the Fall of 1995, in which we achieved a complete headcount of employees, contractors and visitors in fourteen minutes.

The success of this drill led us to begin work on what was our most challenging drill to date: A coordinated community wide emergency response drill with an evacuation component. We first had to identify all potential participants. We sent out letters inviting representatives from Fire, Police, EMS, Medical, Local Emergency Planning Council (LEPC), OSHA, DEP and others to an information meeting. From this meeting, we began planning the type of incidents, their timing, the expected responses and responders, the training needed to implement the handling of a major emergency and the facilities needed to successfully fulfill such a response. We also insisted, from the very beginning, that this drill was not to satisfy the needs of only one participant. We actively solicited needs from each participating agency and developed scenarios to address all of the needs presented. We found many areas of need including: communication, command & control and personnel needs. We used members of our Millwide Evacuation Committee to address communications and training, brought in a part-time consultant to help address command and control issues, prepared training for all members of our staff, and devised personnel control methods.

We developed training programs for multiple response scenarios, communications protocols between private and public responders, and an education program for the public and our employees; all this was done to assure understanding of the importance of the drill and the fact that it was indeed a drill. We implemented a communication protocol to inform the community of the drill dates and timing. We are a very large facility with a very close community connection. It was apparent to us in the early stages of planning that all drills had to be very carefully communicated to not only our employees, but also the community.

The drill was successfully completed on the scheduled date. We learned a lot about resource management and communications. All responding teams had the opportunity to use their skills and equipment. The day was a positive ending to a long process. All of the responders found that, even amidst the confusion, their training and skills allowed them to get the job done. We will be preparing a report and sharing it with all participants in the near future.

Mr. Leclerc is the Safety Manager at Boise Cascade Paper Mill in Rumford, Maine.
The National Institute of Occupational Safety and Health (NIOSH) recently reported that annually, two million workers are exposed to respirable, crystalline silica, with over 100,000 exposed to dangerous levels. Silicosis, a disease caused by exposure to silica, kills about 300 workers every year. Silica is found in a variety of occupations in general industry, the maritime trades, and construction. Activities which lead to significant exposure to respirable silica include sandblasting; rock drilling; quarrying; stonecutting; concrete brick, slab, and block cutting; demolition of concrete and masonry structures; dry sweeping or pressurized air blowing of concrete, rock and sand dust; and railroad repair and track maintenance, including grooming of ballast rock and tunneling of the earth's crust. Other sources of silica include working with calcined diatomaceous earth, asphalt paving manufacturing when sand and aggregate pass through rotary dryers, repair and replacement of rotary kilns in the pulp and paper industry, and in food processing operations in the sorting, washing, and grading areas.

Because of this exposure, the Occupational Safety and Health Administration (OSHA) has developed and is in the process of implementing a Special Emphasis Program (SEP) for silicosis in an effort to reduce and eliminate the incidence of this disease. The OSHA area offices recently contacted affected and interested stakeholders including insurance carriers, health departments, labor organizations, and trade associations to encourage them to address crystalline silica hazards in the workplace. OSHA and the Maine Bureau of Labor Standards (BLS) offer free training. Free consultation is available through the BLS. This outreach effort has been initiated and is intended to provide the following information:

1. Health effects of exposure to crystalline silica
2. How the hazard can be reduced and/or eliminated through appropriate engineering and other control methods
3. Housekeeping and hygiene issues
4. Medical surveillance requirements
5. Personal air monitoring to assess worker exposure and ensure controls provide adequate protection
6. Personal protective requirements to include respiratory protection
7. Employee training
8. Recordkeeping requirements

The second part of OSHA’s SEP is an enforcement element that became effective on August 1, 1996, and involves the implementation of an enforcement program. Inspections will be conducted in General Industry, Maritime, and Construction where overexposure to crystalline silica is suspected or cases of silicosis have been reported. Inspections selected under this SEP will be identified and targeted under neutral selection criteria and will focus on how the employer is dealing with silicosis related hazards. Companies interested in training or an outreach program may do so through professional associations.

For more information on OSHA’s new SEP for silicosis, please contact either OSHA’s Area Office at (207)-941-8177 or Maine’s Bureau of Labor Standards at (207)-624-6460.

Mr. Stiefken is an Assistant Area Director and Team Leader for OSHA’s Bangor Area Office.

Did You Know?

The following publications on Emergency Response and Preparedness are available from OSHA or BLS:

- Hazardous Waste and Emergency Response (OSHA 3114)
- How to Prepare for Workplace Emergencies (OSHA 3088)
- Principal Emergency Response and Preparedness Requirements in OSHA Standards and Guidance for Safety & Health Programs (OSHA 3122)
Minimal Elements of Emergency Action Plan

Many OSHA standards require employers to have emergency action plans. One standard (29 CFR 1910.38) describes the minimum elements that must be included in all emergency action plans required by a particular OSHA standard. Except for employers with 10 or fewer employees, the plans must be in writing.

The following elements, at a minimum, must be in the plan:

1. Emergency escape procedures and emergency escape route assignments
2. Procedures to be followed by employees who remain to operate critical plant operations before they evacuate
3. Procedures to account for all employees after emergency evacuation has been completed
4. Rescue and medical duties for those employees who are to perform them
5. The preferred means of reporting fires and other emergencies
6. Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan
7. An employee alarm system which complies with Section 1910.165
8. The types of evacuation to be used in emergency circumstances
9. Before implementing the emergency action plan, the employer shall designate and train a sufficient number of persons to assist in the safe and orderly evacuation of employees

Other standards, such as Hazardous Waste Operations & Emergency Response (29 CFR 1910.120) have additional requirements.

The Golden Rule at Work

Last fiscal year, the Bureau of Labor Standards awarded a grant to Peter Snell to study successful Workers’ Compensation Programs in companies of various sizes.

Mr. Snell has a business which assists companies to analyze their Workers’ Compensation loss data in order to develop programs which reduce costs. He has developed a series of evaluation tools to help him assess a company’s existing program. These tools focus on concrete factors such as alternate duty jobs and early return to work programs.

It was Mr. Snell’s intention to use his tools to study companies with successful Workers’ Compensation programs and find the common elements which distinguished these programs from other less successful ones. Mr. Snell selected a group of companies which was not a random sample but did represent a broad range of sizes and businesses.

He wasn’t far into his study when he found, to his surprise, other factors which appeared to influence a company’s Workers’ Compensation experience. He called these “soft” factors because they were not quantifiable. Mr Snell listed all the soft factors he could find and assigned values to them based on his subjective evaluation of their relative importance. Essentially these factors reflect the values a business holds in its treatment of its workers. They can be summed up as variations of the Golden Rule: treating others as they would like to be treated and demonstrating concern for them on a day to day basis.

The study indicated that companies did not realize that these factors were happening in their businesses until asked. Businesses tend to focus on hard elements such as return-to-work programs and medical management programs.

The data needs to be analyzed further. Not all companies with low loss experience follow these principles. Some even had fairly punitive systems in place with low losses. For more information, contact Peter Snell at (207)-490-1709.
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<tr>
<td>Hazwoper 8 Hour Supervisor (Augusta)</td>
<td>10/2</td>
<td>Dames &amp; Moore</td>
<td>(207)-623-1683</td>
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<td>CPR for the Professional Rescuer</td>
<td>10/5</td>
<td>American Red Cross</td>
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<td>Community First Aid &amp; Safety W/CPR (Bangor Area)</td>
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<td>Hazwoper 24-Hour/Emergency Response (Augusta)</td>
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<td>24 Hour Confined Space Rescue Technician (Plymouth)</td>
<td>10/8-10/10, 12/2-12/4</td>
<td>Burgess Associates</td>
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<td>16 Hour Confined Space Rescue (Plymouth)</td>
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<td>8 Hour Confined Space Rescue Refresher (Plymouth)</td>
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<td>Lead-Based Paint Abatement Supervisor (Augusta)</td>
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<td>DOT Hazardous Materials Handling/Transporting Course</td>
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<td>Bloodborne Pathogens &amp; Ergonomic Team Building (Houlton)</td>
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<td>Bureau of Labor Standards</td>
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<td>Asbestos O&amp;M Worker —OSHA Class III (Augusta)</td>
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<td>40 Hour Hazardous Waste Operations Course (So. Portland)</td>
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<td>40 Hour Hazardous Material Technician/Hazwoper Course</td>
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<td>1910 General Industries Course (Westbrook)</td>
<td>11/12 &amp; 19, 12/3, 10 &amp; 17</td>
<td>Bureau of Labor Standards</td>
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<td>1910 General Industries Course (Bethel)</td>
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<td>Bureau of Labor Standards</td>
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### Upcoming Safety & Health Training Classes in Maine
#### October-December, 1996

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<td>Dunlap Corporation</td>
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From the Director’s Desk

The Bureau of Labor Standards has quietly undergone many changes in the past year, with even more new developments yet to come. Over the past year we have restructured the Bureau into a more streamlined and goal driven organization whose clear focus is on the delivery of services to our customers that, as our Mission states, “will continually improve workplace health, safety and labor rights” for all citizens of Maine. Our new Vision for the future is one that links us directly with all other Maine Department of Labor programs and stresses innovation and creativity as we strive “to be a catalyst for creating partnerships and networks” that will result in positive change in the Workplace Culture in Maine.

This is clearly an ambitious set of goals and they are the kind of challenges that we at the Bureau look forward to. While the changes at BLS over the past year have been accomplished quietly, it’s now time for us to make a little noise. Here are some of the new DOL/BLS initiatives that you will be “hearing” about in the coming months:

- Implementation of several “Young Worker Programs” in Maine
- A Statewide Media Campaign on Workplace Safety, Health and Labor Rights
- Development of a DOL “Customer Service Center” at BLS
- The expansion of the existing Research and Statistics Division into a full service Technical Services Division
- Implementation of the “Maine Public 30” Program
- Development of Targeted Inspection Programs in our Wage & Hour and Workplace Safety & Health Divisions
- Continued partnership with Federal OSHA on the second generation of the “Maine 200 Program”
- Special Targeted Programs for Small Business

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