
Some Review Comments by NSW Fire Brigades on Selected Emergency Plan Submissions

NSW Fire Brigades is the statutory reviewer of Emergency Plans under Clause 174ZC of the NSW OH&S Amendment (Dangerous Goods) Regulation 2005 and Clause 66 of the NSW Explosives Regulation 2005.

The NSW Fire Brigades have posted a number of downloadable files on the requirements for dangerous goods emergency plans.

<http://www.fire.nsw.gov.au/business/guidelines/dangerousgoods.php>

A selection of typical comments that have been provided by NSW FB to Emergency Plan submissions which have been received to date is set out hereafter.

1. Comments on Emergency Plan No 1

1. **Hazardous materials:** The NSWFB recommends that the table in section 5 of the plan is amended to specifically identify all OH&S Regulation Schedule 5 dangerous goods (DG's).

2. **Fire Teams:** The NSWFB notes that the fire teams referred to in section 7.2.3 are primarily evacuation wardens. The term "fire teams" usually refer to trained on-site staff specifically allocated to undertake active fire fighting operations, (e.g. fire suppression with hose lines etc). The NSWFB recommends that the plan is appropriately amended.

3. **Evacuation:** The NSWFB recommends that specific procedures are developed for the accounting of staff and visitors during an emergency (e.g. the visitors sign in register and the staff attendance register are to be taken to the assembly area and checked off). These procedures need to be clearly articulated within the plan.

4. **Notification of Authorities & Adjacent Facilities:** To ensure continuity in the implementation of the plan the NSWFB recommends that a dedicated emergency position of "Emergency Services Liaison Officer" is created. This position needs to be allocated to a specific company position.

5. **Statutory Investigation:** The preservation of evidence for any statutory investigation may initially be the responsibility of the operator. It will also be the responsibility of the operator to co-operate with any agency which undertakes a statutory investigation. The NSWFB recommends that these requirements are clearly articulated within the plan.

2. Comments on Emergency Plan No 2

1. The requirements of Clause 174ZC of the Occupational Health & Safety Regulations (OH&S Regs) require that where dangerous goods are stored in quantities exceeding those outlined in schedule 5 of the OH&S Regs an emergency plan is to be developed. The NSWFB recommends that the table in section 3 of the plan is amended to specifically identify all Schedule 5 dangerous goods (DG's).

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2. To ensure that the plan is comprehensive in nature, the NSWFB recommends that all possible types of emergencies are addressed within the plan, (e.g. building fires in the workshop and office buildings, vehicle fires).
 3. To ensure ease of use by persons not familiar with the site, the NSWFB recommends that the site safety and hazard layout plan is printed in colour and incorporates a legend of symbols used within the layout plans.
 4. The emergency plan must include a specific section which outlines evacuation procedures and responsibilities. The responsibility for the accounting of staff and also of visitors to the site following evacuation needs to be allocated to a specific position, ideally the person delegated with this task should not be the incident controller. The duties and allocation of the task needs to be clearly articulated within the plan.
 5. To ensure that the emergency skills of staff is maintained, Section 7 of the plan needs to clearly articulate the minimum training timeframes to be implemented.
 6. To ensure ease of use the plan should include a glossary of abbreviations.

3. Comments on Emergency Plan No 3

Section 2.1 Distribution List: The distribution list should include any external agencies in receipt of the sites emergency plan.

Section 2.3 Amendments and Revision: The plan does not contain Section 2.2, the plan should be reformatted accordingly. Additionally this section should provide instructions to reference the specific appendix.

Section 5 Hazardous Materials: The hazardous material table should also specifically identify Schedule 5 dangerous goods (i.e. 'Notifiable' quantities).

Section 6 Types of Emergencies: The fire emergency should not be divided into Minor Fire and Major Fire, the use of descriptive wording introduces a level of subjectivity to a decision making process and may delay an appropriate response by a relevant emergency service.

Section 7.2 Evacuation: Specific evacuation procedures need to be clearly articulated within the plan.

It is critical that the location of all site staff and visitors to the site are verified, the responding emergency service agencies strategies and actions will be initially formulated on ascertaining whether site personnel have been accounted for or are unaccounted for. Accordingly the plan must specifically allocate the role of accounting for site personnel and site visitors to a specific company position.

The plan must clearly detail specific evacuation procedures, (e.g. the receptionist must take the personnel attendance book and site visitor's book to the nominated assembly area and conduct a roll call).

Section 8 Activation of an alarm or raising the alarm:

The emergency plan must detail the specific procedures staff and visitors must adopt on hearing or being notified of an emergency alarm, (i.e. local, site and external). Specific procedures for each level of alarm must be clearly detailed within the plan, (e.g. cease current task and proceed to the assembly area).

Section 12.2 Review of the Plan

The emergency plan is required to be reviewed in accordance with the requirements of Clause 174ZC of the Occupational Health and Safety Regulations 2001. Additionally the NSWFB recommends that the emergency plans' contact list is reviewed annually, this will ensure that new personnel who may occupy key company emergency positions are effectively captured.

4. Comments on Emergency Plan No 4

Section 1 Document Control: The distribution list should detail all recipients of the emergency plan including external recipients (e.g. NSW Fire Brigades).

The list of amendments refers to the document controller and a specific person, the NSWFB recommends that the position within the organisation responsible for document control is referenced, (i.e. Depot Manager).

Section 2 Emergency Contact Numbers: This section should be retitled as the "Sites Emergency Contact List".

Section 4 Premises Profile: This description of the sites' depots should also specifically identify those depots which contain Schedule 5 dangerous goods (i.e. 'Notifiable' dangerous goods).

The site layout plan 4.4 should be colour coded and identify all essential information, this will assist persons who may be unfamiliar with the site to readily identify the locations of key facility operational and storage areas.

Section 5 Hazardous Material On-Site: The hazardous material table in this section should incorporate and identify all Schedule 5 dangerous goods and list them in order of potential hazard.

Section 6 Emergency response Procedures: The terms minor and major should be deleted from all text which relates to incidents, the use of descriptive wording introduces a level of subjectivity to a decision making process and may delay an appropriate response by a relevant emergency service.

Section 6.3 should be retitled as "Response Procedures for Hazardous and Non-Hazardous Materials Incidents" and all response procedures for hazardous or unidentified spillages should incorporate notification of the responsible agency (i.e. NSW FB).

Sections 6.3.2, 6.3.3, 6.3.4, 6.3.5 need to be rationalised in accordance with the NSW FB previous recommendations (i.e. Major, Minor, Large and Small).

Section 7 Alarm Initiation: This section needs to include relevant, comprehensive and detailed information, additionally the procedures required to be undertaken by persons upon alarm activation needs to be more comprehensively detailed within the plan.

Section 8.2 Response Flow Chart: The response flow chart does not appear to be complete and is difficult to follow. Additionally when an alarm is raised the current flow chart does not allow for the notification of emergency services for all levels of alarm.

The NSWFB recommends that the flow chart is revised and modified.

Section 8.4 Main Emergency Personnel: To ensure that all emergency tasks are undertaken it is important that all emergency positions are delegated to specific staff positions, these positions need to be identified within the plan.

The draft plan does not allocate emergency positions to a corresponding staff position; the NSW FB recommends that the emergency plan is appropriately amended.