Emergency Response Teams

HOW NFPA STANDARDS CAN HELP YOU EVALUATE AN EMERGENCY RESPONSE TEAM

OSHA regulations require that industrial sites, including grain handling facilities, have rescue capabilities to address emergency response incidents. Issues that should be addressed in your emergency action plans include certain potential incidents such as:

- Confined space rescues.
- Falls and other medical emergencies.
- Fires.
- Dust explosions.
- Hazardous material (HazMat) and chemical releases.
- Other emergencies.

What OSHA Says
The Occupational Safety and Health Administration (OSHA) will expect you to have some type of rescue service or emergency response team that is capable of dealing with an incident involving the permit-required confined spaces on your site in a “timely manner.” This emergency response team can take one of four forms:

1. Qualified team on your site (own employees).
2. Off-site rescue service (other than a fire department).
3. Competent and qualified fire department (volunteer or full-time).
4. Blend of the above.

In most rural communities, it makes sense to partner with the volunteer fire departments in your county and form joint teams of eight to 12 people who can train for a variety of agricultural-related emergencies. This “county team” may consist of four to six people from private industry and four to six firefighters from various departments spread across the county, to provide broad geographical coverage.

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Most grain handling operations are interested in grain entrapment prevention, not in becoming a rescue group. However, your site must identify an emergency response rescue team that is capable and willing to train with you every year. You need to identify the type of permit-required confined spaces that you are dealing with and the type of rescue equipment available at your site.

Unfortunately, OSHA does not give the industry guidance in how you realistically approach an emergency rescue response team in rural communities, which are serviced primarily by lean volunteer departments.

Nor does OSHA tell you how to evaluate response teams that may be able to respond effectively to a confined space emergency within 15 to 20 minutes for a grain engulfment.

OSHA will only cite you for a serious violation and fine you to the fullest extent of the law, if you have not identified a competent emergency response team in your area and/or have failed to train with it on an annual basis.

Consensus Standards

Consensus standards such as National Fire Protection Association (NFPA), American National Standards Institute (ANSI), and American Society for Testing and Materials (ASTM) are dedicated to improving the safety of rescuers and victims and are improving the quality of operations. They are not focused on citations and/or fines.

Certain recommendations made in NFPA, ANSI, and ASTM specify minimum standards for much of the equipment used for structured rope rescue.

The NFPA standards help you evaluate the emergency response team in your area. You should understand how some of these NFPA standards can assist you in this process:

**NFPA 1670** – Technical rescue standard that deals with organizations providing many different technical rescue disciplines.

**NFPA 1006** – Deals with the job performance requirements for individuals wishing to be deemed “qualified.”

**NFPA 1983** – Provides recommendations for life safety ropes, harnesses, and other items and equipment designed for rescues.

The NFPA has had a great impact on emergency response groups worldwide. Its standards, however, are consensus standards. Unless adopted by a governmental agency, it is not law.

However, most safety professionals regard NFPA standards as national benchmarks for many safety operations and issues. These standards provide a strong basis for technical rescue operations at both the organizational and individual levels.

Here are more detailed descriptions of the three NFPA standards with regard to rescue team performance and equipment.

**NFPA 1670**

The Standard of Operations and Training for Technical Rescue Incidents provides help for an organization, in terms of evaluating its performance at three levels:

- Awareness.
- Operations.
- Technicians in various technical rescue disciplines.
Seven different technical rescue disciplines are mentioned in this standard. Most of the disciplines utilize some aspect of high-angle rope techniques. The seven technical rescue disciplines include:

- Structural collapse.
- Confined space.
- Water.
- Trench and excavation.
- Rope rescue.
- Vehicle and machinery.
- Wilderness search and rescue.

An agency would choose which disciplines and at what level of capability they wish to function.

**NFPA 1006**

*Professional Qualifications for Rescue Technicians* covers the qualifications of an emergency responder to perform in certain disciplines.

In order for a person to become a rescue technician in any of the disciplines listed under NFPA 1670, he or she must demonstrate several job performance requirements. This list of requirements commonly is referred to as “core plus one.”

There are specific chapters within NFPA 1006 that are applicable to confined space rescues. The core job performance requirements assess the common knowledge and skills related to site operations, victim management, maintenance, and rope rigging.

Some of the specific skill areas required for the rope rescue specialty include areas such as:

- Constructing a multipoint anchor system.
- Constructing a compound rope mechanical advantage system.
- Moving a victim in a high-angle or vertical environment.

This NFPA standard also addresses specific items in the confined space rescue specialty:

- Assessing the incident given a pre-plan of the space.
- Controlling hazards specific to the incident.
- Preparing for entry into a confined space.
- Properly packaging the victim for removal.

**NFPA 1983**

*Standard on Fire Service Life Safety Rope and System Components* has contributed greatly to the standardization of rope specifications. NFPA 1983 makes recommendations for hardware (auxiliary equipment) like safety ropes and harnesses. These standards address a number of equipment areas, including the following:

- Rope rescue equipment.
- Rope composition and construction.
- Fall factors.
- Rope care, maintenance, and storage.
- Deploying rope.
- Low-stretch kernmantle rope made of 100% nylon to be used in rescues.
- Require a series of static pull and drop tests to determine the structural integrity of harnesses.
- Specification for a personal escape rope.
- Designating carabiner as either personal use (intended for a single-person load) or general use (which could be subjected to a two-person load).
• Defining escape belts and ladder belts. Escape belts are intended to be used for emergency self-rescue, while ladder belts are a positioning device to prevent a fall from a ladder.
• Many other specifications and definitions.

OSHA vs. NFPA

In some cases, the OSHA work safety regulations don’t apply to rescuers. Certain regulations pertaining to confined space entry and fall protection are contrary to what are considered safe and acceptable practices for rescuers. This is very clear in the OSHA letter to the industry dated Aug. 4, 2010, and the OSHA Facts sheet that was enclosed with it.

OSHA standard CFR 1910.146 is not the only OSHA regulation requiring trained rescuers and proper equipment. The OSHA Fall Protection, Respiratory, and Hazard regulations all require specific rescue capabilities.

OSHA requires compliance to rules, and they state what the employer must accomplish. However, general industry regulations published by OSHA mostly are oriented to performance rather than being based upon specifications or instructions on how to accomplish a certain task.

Unfortunately, most OSHA regulations will provide only a checklist of potential violations and the citations and fines that can be incurred. On the other hand, voluntary consensus standards such as NFPA actually tell you how to get it done. What is your facility currently doing to be prepared for a rescue?

The Safety and Technical Rescue Association (SATRA) has representatives that sit on the NFPA 1006 standards committee, and they are accredited by the National Board on Fire Service Professional Qualifications (www.theprofessionalboard.org).

Please contact them directly, if you would like more information on any of these NFPA standards. You can contact them by e-mail, bharp@satra.us or 313-415-4658 or visit the web site at www.satra.us.

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