

## UCSB Environmental Health & Safety Emergency Response Guidelines:

Environmental Health and Safety staff routinely respond to a variety of situations including hazardous materials spill-cleanups, odor complaints, pickup of abandoned chemicals and related alarms (see Attachment). EH&S has a staff member on-call 24 hours a day, 7 days a week to either: a) provide technical assistance to first responders and act as liaison to outside agencies, or b) provide direct assistance for lower-level incidents.

At no time will an EH&S staff member put themselves at risk in an emergency situation beyond their training and capability. First responders (Fire and Police) are safety personnel who are responsible for rescue involving life-threatening situations.

## Attachment

The purpose of this attachment is to define the types and levels of incidents that EH&S is capable of responding to.

### I. Hazmat Response Levels and Procedures

There are 4 levels of personnel protection associated with hazmat response (Levels A through D) depending on the degree of hazard. For example, Level B stipulates the use of self-contained breathing apparatus. EH&S has the equipment to handle Level B, C and D responses. However the number of trained personnel is relatively small – approximately 8.

The basic procedures in dealing with hazmat events is outlined in two UCSB documents: *The Hazardous Materials Emergency Response Plan* and the *Campus Emergency Operations Plan*.

Some key points include:

- To access EH&S assistance, we maintain one person on-call at all times via the “Technical Assistance Cellphone” (TAC). Currently that number is 893-3194.
- Large-scale responses are coordinated through the “Incident Command System” which is the standard emergency management system used by response agencies. It involves the assigning of personnel to well-defined roles in a response (e.g. Logistics, Operations, Safety Officer).
- Larger-scale events may also involve the activation of the campus Emergency Operations Center located at EH&S and would probably involve personnel from a number of other campus units such as Facilities, Police, Business Services, etc.

### II. Incidents Within EH&S Capabilities

The types of incidents generally within EH&S capabilities include:

- Cleanup of a chemical, radiological or biological spill of a known material in a controlled environment such as a laboratory.
- Cleanup of small spills of unknown chemicals in a laboratory environment where there is reasonable assurance from lab personnel that there is no significant hazard to a responder in appropriate PPE.
- Cleanup/pickup of abandoned syringe needles.
- Abandoned and labeled chemical containers, that are deemed safe for transport.

- Abandoned and *unlabeled* chemical containers, but not unmarked packages. Unlabeled chemical containers will be evaluated on a case-by-case basis taking into account factors such as: location, type, volume and integrity of container; other distinguishing characteristics, e.g. crystals or dried material on outside of container.
- Unknown chemical spills in public areas will be evaluated on a case-by-case basis for proper response. EH&S may choose to do in-house classification of unknowns (“haz scanning”) into general categories (corrosive, flammable, oxidizer, etc.) and then do cleanup accordingly.
- Nuisance odor complaints in lab and non-lab buildings where there is no evidence that the odor is producing conditions immediately dangerous to life and health.
- Limited “triage” and cleanup of lab buildings in a post-earthquake environment in conjunction with outside agencies and/or contractors.

### III. Incidents Beyond EH&S Capabilities

There are certain types of incidents that EH&S will respond to, but will **not** do “scene entry”. In these scenarios EH&S will be on-site providing information and logistic support to professional response organizations such as the County Fire Department, Police, bomb squad, and outside vendors specializing in hazardous materials response. EH&S staff provides familiarity with campus buildings/operations and act as a liaison with outside agencies.

The following incident types should be handled by agencies external to EH&S:

- Bomb threat.
- Terrorist attacks (biological, chemical or explosive).
- Entry into buildings that are on-fire or experiencing significant flooding, or experiencing a significant natural gas leak, etc. (e.g. post earthquake).
- Unmarked package found in public area whose contents are otherwise unknown. Note difference between “package” and “container” – see Part II.
- Incidents where a hazardous material was spilled, but because of its toxicity, flammability, physical form, or volume are beyond EH&S capabilities; e.g., requires Level A, or possibly Level B entry. It should be noted that in campus labs the number of materials that would fall into this category are quite small. Most lab containers are small; ventilation in labs is generally good, and the locations of large toxic gas cylinders are known and are generally stored in ventilated gas cabinets.

- Post-earthquake when there is significant structural damage to a given building and there is a reasonable chance of building collapse from an after-shock. For the small to moderate-size quake, the “triage” of campus lab buildings will be an EH&S-managed function. However, entry will be determined on a case-by-case basis and where appropriate, professional responders or contractors will be called in.
- Campus custodial staff or an outside contractor generally handles cleanup of human blood or other bodily fluids. Blood/bodily fluid cleanup involves other potential issues such as: Bloodborne pathogens exposure (e.g., HIV, hepatitis) and in some cases the classification of an incident under “trauma scene waste management” regulations. See the Biosafety section of the EH&S website for a fuller discussion of these issues.
- Cleanup of sewage spills is not an EH&S responsibility, however for a major spill we may be involved with Facilities in addressing one or more of the following concerns: mitigating human exposure; addressing any environmental impacts; addressing any regulatory reporting needs.

#### IV. Practical Limitations

Although EH&S may do active scene-entry for the incident types above, there are also some practical limitations that need to be noted.

- As noted above, EH&S has a person on-call at all times, however, EH&S does not have a team standing-by to do hazmat scene-entry on short-notice, particularly after-hours. It may be some hours before an adequate team can be alerted and mobilized.
- Per OSHA requirements, for active hazmat *emergencies* involving self-contained breathing apparatus, there needs to be a minimum of 4 individuals in SCBA – “2 in and 2 out”. This requirement puts serious constraints on whether, or how rapidly, EH&S can mobilize a Level B team to do scene-entry; particularly after-hours. However, it should be noted that routine spill cleanup operations are not considered an emergency under OSHA regulations.
- Some responses can include the requirement that someone interact with utilities or life safety systems for a particular building, e.g. resetting alarm systems, manipulating HVAC systems, turning off fire sprinklers, etc. These tasks are a Facilities responsibility and EH&S typically does not have the knowledge required or responsibility to do so.