EHS Response System SOP

1. Purpose / Background

The Environment, Health and Safety Office has a responsibility for providing the highest level of emergency response system support and service to the Institute on a 24 hours per day 7 days a week basis. A professional level staff member from EHS is assigned the responsibility for this service on a weekly basis.

This SOP identifies the roles, responsibilities and actions to be taken by EHS Response System personnel in the event of a call coming in to the EHS Office, asking for assistance with an emergency, critical or urgent issue. This procedure also activates regulatory response plans such as the MIT Hazardous Waste Contingency Plan, MIT Spill Prevention Control and Countermeasure Plan, the Biosafety and Select Agent Manual as required or as knowledgeable EHS professionals are informed of an incident.

2. Prerequisites

Prior to participating in the EHS Response System, all EHS participants will complete the EHS Response System training course, will meet the minimum employment time specified in this SOP (section 5.0, Training), and will have the approval of their respective Deputy Director and the EHS Emergency Preparedness and Response Service Team (EHS EPRST) to be included in the EHS Response System rotation.

3. Procedures

The EHS EPRST Procedures documents shall be adopted herein by reference. The documents consists of the Procedures Process Map (see 8.3.1); the Administrative Triage Process Map (see 8.3.2) and the Administrative Tools Document (see 8.3.3).

4. Roles & Responsibilities

4.1. EHS Response System

It is the responsibility of the EHS Response System to ensure the safety and health of MIT students, employees and victims, prevent or minimize the discharge of any hazardous material into the environment and protect the property of the Institute while responding to an incident. This is achieved by working cooperatively as part of MIT’s Emergency Preparedness and Response System and, when needed, outside agencies. The participants when “On Duty” must carry out their responsibilities promptly when responding to EHS issues within the MIT Community. Responders will document and communicate relevant information to involved parties. The EHS Response System personnel and Administrators, following approved protocols, shall also respond to calls for service, information and other non-routine requests. The EHS Response System shall provide responders with sufficient resources to accomplish its goal.

1 Where appears, this indicates a definition is found for this word, phrase or term in the definitions section (Section 9) of this SOP.

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4.2. Managing Director of EHS Programs
   1. To assist Response System personnel when requested.
   2. To carry out any duties as outlined in the MIT Emergency Preparedness and Response System documents and responsibility matrix.
   3. Provide responders with sufficient resources to accomplish its goal.

4.3. Director of EHS Office
   1. To assist EHS Response System personnel when requested.
   2. To carry out any duties as outlined in the MIT Emergency Preparedness and Response System documents and responsibility matrix.
   3. To review incident reports.
   4. Provide responders with sufficient resources to accomplish their goal.

4.4. Associate Directors / Deputy Directors
   1. Determine and make available qualified staff for EHS Response System.
   2. Resolve program specific scheduling issues and personnel issues.
   3. Review EHS Response System reports, as appropriate for their program and initiate appropriate actions.
   4. Develop program specific guidelines for response.

4.5. EHS Emergency Preparedness and Response Service Team
   1. Review all requests for changes in Primary coverage outside of a Program.
   2. Represent EHS Response System at all After Action Reviews (AAR’s9.) See AAR SOP for details of AAR activities.
   3. Develop and provide training for all EHS personnel involved in the EHS Response System.
   4. Review responses and respond to input pertaining to the EHS response system.

4.6. Primary Response System Person:
   1. The Primary shall respond to any request for EHS due to emergency, real or perceived, or when contacted.
   2. The Primary will gather sufficient information using available resources to assess the situation and decide on an appropriate response.
   3. The Primary has the authority to request assistance from Secondary Response System Individuals and any other EHS personnel as needed. This can be either for technical or non-technical support.
   4. It is the Primary’s role to coordinate available EHS resources to resolve9 the situation.
   5. At large-scale events the Primary supports the Incident Commander9 and must report to the Incident Command Post9 when arriving to the scene.
   6. The Primary will follow up with any unresolved issues. When there is a change of coverage the Primary will brief the new Primary of any unresolved issues.
   7. The Primary will document all incidents and resolutions, including secondary reports.
   8. The Primary shall be available and carry the Response System program pager 24/7. Pager transfers9 are done in person only.

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9. The Primary has the responsibility to notify the EHS Emergency Response Assignments Coordinator in advance of any changes in coverage within their particular Program.

10. If the Primary becomes the MIT Incident Commander, then one of the Secondary Response System Individuals, as designated by the Primary, becomes the EHS Primary contact for the duration of the incident.

4.7. Secondary Response System Individual

1. The Secondary shall respond to an emergency or perceived emergency when contacted by the Primary Response System Person.
2. Once contacted the Secondary, acting as a specialist for their program, will gather sufficient information using available resources to assess the situation and decide on a response.
3. The Secondary should use all available resources to resolve the situation.
4. The Secondary shall keep Primary informed of the situation in a timely manner.
5. The Secondary has the authority to request assistance from the Primary.
6. The Secondary, through the Primary, can request assistance from other members of the Response System team.
7. If outside assistance is needed the Secondary will call direct and inform the Primary the next business day.
8. The Secondary will document all actions and communicate this to the Primary.
9. The Secondary will assume the role of the temporary Primary contact person if the Primary is the Incident Commander.
10. The Secondary shall be available and carry a pager 24/7 during their rotation.
11. All changes in Secondary coverage must be reported directly to the Primary and the EHS Emergency Response Assignments Coordinator.

4.8. EHS Emergency Response Assignments Coordinator

2. Coordinate changes in Primary and Secondary coverage.
3. Send out Response System weekly coverage roster on the first working day of the week. If any changes are made the new roster will go out no later than Tuesday evening (16:00 hours).

4.9. Administrative Assistants

1. Ensure the EHS reception area and main telephone number 2-3477 is continually staffed during normal working hours to receive calls and visitors.
2. When transferring telephone coverage make sure any changes to Response System information are passed along as well.
3. When answering a telephone call use “tools” to help determine the nature of the call and response. Once determined, the call will be forwarded to the appropriate Program Response System.
4. Assist Response System responders as requested.
5. Document calls as necessary.

4.10. EHS Lead Contacts and Team Members

1. To help resolve any EHS issues or handle routine requests from the DLCs, EHS Administrative Assistants, Primary or Secondary Response System Individuals.
2. Report outcome of all non-emergency, undetermined requests for service to DLC EHS Coordinators.

4.11. **EHS Personnel**

1. To assist the Primary or Secondary as needed when requested.

4.12 **EHS EPRST, Director of EHS Office, Director of EHS Programs, Deputy Directors**

1. To review, either annually or as After Action Reviews (AARs) indicate, the response system to identify means of improvement to the system.


3. Review incident reports and make a determination on summary reporting.

5. **Training**

Initial training in the EHS Response Process will occur for all EHS participants in the EHS Response Process. Routine refresher training will occur annually or when determined to be necessary due to significant changes in the process, new procedures added to the scope of the EHS Response process or a major change in participants, as determined by the EHS Emergency Preparedness and Response Service Team.

No EHS personnel should assume a response role until they have completed training on this SOP. The apprenticeship for Primary should include six months of employment for Institute familiarity (both physical and operational) and an additional six months in the EHS response system rotation as Secondary for their particular program.

The Director of EHS, the Deputy Director of any new employee, and the EHS EPRST can review and agree to alter this time frame based on specific documented proficiency in the areas of EHS response and familiarity with the MIT campus.

Training Manual shall be adopted herein by reference.

6. **Monitoring Requirements**

N/A

7. **Record Management**

Records to be maintained include training records, logs of all responses by EHS, and audits of this process. Program specific, required records shall be kept in the records management of each program. The Records Retention SOP specifies the retention period of all EHS records.

For all EHS response reports entered into the EHS log, a notification of a new entry in the EHS log will be issued electronically to the appropriate EHS Coordinator(s) and EHS Lead Contact.
8. **References**

This section lists all additional resources that may be useful in performing the procedures. They include:

8.1. **Standards**
N/A

8.2. **Other SOP/ SOGs**
   8.2.1 EHS Incident Investigation SOP
   8.2.2 EHS Records Retention SOP-0021
   8.2.3 EHS Spill Response SOP-0004
   8.2.4 MIT After Action Review SOP
   8.2.5 MIT Emergency Preparedness and/Response SOG

8.3. **Supplementary Documents**
   8.3.1 EHS Response System Procedures Process Map
   8.3.2 EHS Administrative Triage Process Map
   8.3.3 EHS Response System Administrative Tools Document
   8.3.4 EHS Response System Training Manual⁹

9. **Definitions**
   9.1. __⁹ Indicates a definition is found for this word, phrase or term in the definitions section (Section 9) of this SOP.

9.2. **AAR:** After Action Review. See MIT AAR SOP, adopted herein by reference, for details.

9.3. **Critical:** A situation deemed by the Primary, or collectively by the Primary and Secondary staff that poses a significant negative impact to human health or safety, the environment, or essential Institute infrastructure.

9.4. **DLC:** An MIT Department, Laboratory, or Center.

9.5. **EHS Emergency Response Assignments Coordinator:** The individual responsible for scheduling EHS primary and secondary on-call assignments.
9.6. **EHS Personnel**: Includes employees within MIT’s Environment, Health, and Safety Office that are full time staff, or full time contract.

9.7. **EHS Preparedness and Response System Service Team**: EHS-comprised team responsible for the oversight and training of the Office’s Response System/emergency response system.

9.8. **EHS Response System Training Manual**: The manual that contains both basic level and level two training documents for all EHS Response System personnel. This manual includes the prerequisites for entry into the EHS RS rotation.

9.9. **Emergency**: A sudden, unforeseen occurrence that requires immediate attention, or a request by a DLC for immediate action to a critical situation.

9.10. **Incident Command Post**: The location at which the main command functions are executed. There can be only one (1) command post per incident.

9.11. **Incident Commander**: The individual responsible for the management and coordination of an emergency incident. The IC may perform all functions without aid, but will usually delegate duties to others. The first person on scene becomes the IC until a better-qualified person can take over.

9.12. **Log**: A record of emergency/Response System occurrences, and response. The log is electronic and a file on the M drive will be the permanent location of all responses, placed in folders designated by month.

9.13. **Off-hours**: Hours during which the EHS office is not open to the Institute. For purposes of the Response System/emergency response system, these hours will be 5 pm through 8 am M-F, all weekends and recognized Institute holidays.

9.14. **On Duty**: An EHS staff member is on duty when they are identified through either Program or EHS assignments as the available responder. Primary responders are identified through the EHS assignment, while second responders are identified through the EHS assignment for off-hours, and Program assignment for working hours.

9.15. **Pager Transfer**: The exchange of emergency pagers between the current and incoming personnel. This exchange must be a person to person hand-off.

9.16. **Primary Response System Person**: Referred to throughout the document as the Primary, this person is the sole EHS office staff member who is identified as the initial point of contact for Institute emergency response for any given Response System week. The Primary is a single individual.

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9.17. **Professional Level:** An EHS employee who has completed the training as described in the EHS Response System Training Manual.

9.18. **Program Response System:** When the EHS office is open to the Institute (8 am to 5 pm, M-F), each EHS Program provides Response System/emergency response to the Institute in their own individual ways. Each Program’s “day-call” is integrated with the EHS Response System.

9.19. **Release:** As defined in EHS Spill Response SOP.

9.20. **Resolve:** An emergency situation is considered resolved when the event can be declassified from critical AND all involved parties are satisfied.

9.21. **Response:** The course of action taken by the Primary and/or Secondary to a reported emergency or request. Response may involve one or more of the following: site visit, telephone instructions, request for immediate assistance at the scene, request for MIT’s Emergency Preparedness and Response System, re-evaluation of “emergency,” or the assistance of an outside agency.

9.22. **Response System week:** Will be Wednesday through Wednesday, 9am to 9am.

9.23. **Routine Call:** During normal EHS business hours, a request from the Institute that is normally handled by a Program as part of their everyday, or normal, practices, as defined by the Program in the *Emergency Response System Administrative Tools Document*.

9.24. **Secondary Response System Individual:** Referred to throughout the rest of the document as the Secondary, they are the EHS office staff members identified as the support team for the Primary. The secondary team is comprised of one staff member each from the Programs other than the Primary’s. The Secondary team will generally be comprised of up to 4 individuals.

9.25. **Spill:** As defined in “Spill” SOP.

9.26. **Tools:** Informational materials provided to the administrative staff to standardize their response to Institute requests for EHS assistance.

9.27. **Waterflow Alarm:** An alarm that either a fire protection sprinkler system has activated or that a fire sprinkler pump has been activated.

9.28. **Working Hours:** 8 am to 5 pm Monday through Friday, except for recognized Institute Holidays.
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| **SOP Owner:** | Bob Edwards, EHS | **Approval:** | EHS: Lou DiBerardinis  
Safety Program: Peter Bochnak |

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8.3.1 EHS Response System Procedures Process Map

- Telephones Pager
  - Gathers Information (may require site visit)
  - Is Action Required
    - NO: LOG, END
    - YES: Specialist Path

Specialist Path

- Is Action Required
  - YES: Assign Additional Specialist(s)
  - NO: LOG, END

1° Completes LOG

Actions
- Joint Actions
  - May include follow up, agency notifications, reports, etc.

Resolve by Telephone or in Person

- Is Site Visit Required
  - YES: Go to Site (may include directions to DLC's)
  - NO: Investigate

- Is 2° Required
  - YES: 2° Coordinates Additional 2° as Required
  - NO: END

Visit required:
- Injury/Death
- Property Damage
- Environment Exposure
- If Requested
- Any Unresolved Issues
- Any Doubt About Whether You Should Go or Not
1. Answer phone
2. Walk-in

Is this an emergency?

Yes

Transfer to MIT PD@100

"Yes", "I don't know", or "Maybe"

No

Is the emergency life threatening?

Yes

Transfer to MIT PD@100

No

Triage:
1. Name
2. Tel#/Ext.
3. Location of Emergency
4. Nature of Emergency

If particulars are known, contact 1st

Service or Inquiry

Service

Inquiry

Contact EHS Lead Contact

If no answer is voicemail acceptable?

Yes

No

Call until team member or appropriate subject matter individual is reached

Log Call in EHS Telephone Log Book
All Information Fields Must Be Completed
# 8.3.3 EHS Response System Administrative Tools Document

## Common Questions

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<td>Kelsey Magnuson x2-3477</td>
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<td>Rosario Silvestri (pager)</td>
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<td>Zhanna Davidovitz x2-2510</td>
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<td>Lead, Copper</td>
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<td>Pool Water / Bacteria</td>
<td>Martha Adams x4-0114</td>
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<td>Survey</td>
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BSP (BioSafety Program)  RPP (Radiation Protection Program)  SP (Safety Program)
IHP (Industrial Hygiene Program)  EMP (Environmental Management Program)
EHS Response

• Although this training is intended to outline the formal EHS Response System, the reality is that we are all responsible for service to our MIT community. As professionals, we should be able to work within the following system to ensure our clients the level of service they need, whether it is an emergency or an unusual or a normal request for services.

Day vs. “Off Hour” Response

Day

• More complicated initiation of event
• Multiple sources for contact
• Multiple admins potential processors of info
• May be diverted to specific program response

Off Hour

• Simple initial procedure
• Two sources for contact
• Primary always 1st contact
• Response crafted based upon information gathered

Roles in EHS Response

• EPO Director
• EHS Director
• Associate Directors
• Deputy Directors
• EPRST
• Primary Response Person
• Secondary Response Person
• Emergency Response Assignments Coordinator
• Administrative Staff
• EHS Lead Contacts and Team Members
• EHS Personnel
• Is there any one left?

Primary Response Person

• Has overall responsibility for EHS response during the week.
• Directs specific program response
• Requests for response from Operation Center or MIT PD during “off hours”
• Must be available (and carry a pager 24/7) to respond in person if requested
• On-site response required if injury, release, or structural damage reported

Primary Duties

• Respond to any request for EHS due to emergency, real or perceived
• Gather sufficient information to make informed decision regarding event
• Request assistance from secondary or other EHS resources as necessary
• Informs EHS coordinator of event (if not already aware) Coordinate resolution of event
• Assist MIT Incident Commander (IC) at large-scale events for any EHS related issue
• Responsible for follow-up (or coordination of follow-up)
• Provide hand-off information if event continues into the next week’s coverage
• If required to become IC at event, assign temporary primary duties to one of secondary individuals

Secondary Response Person
• Provide specialty service for Institute
• Respond to any request from Primary due to emergency, real or perceived
• As a specialist for one of the EHS programs, gather sufficient information to make informed decision regarding event

Secondary Duties
• Keep Primary informed of actions/ event evolution
• If needed, request additional EHS resources from Primary
• Inform Primary if “outside services” are utilized in the event
• Document all actions and forward same to Primary
• Assume temporary Primary duties if Primary becomes IC for event
• Must be available and carry a pager 24/7 during their coverage period
• Must inform Primary and Emergency Response Assignments Coordinator of any changes in coverage

Administrative Assistants
• Ensure 2.3477 and reception area covered during normal working hours
• Triage incoming requests for response, emergency or otherwise
• Understand the different program “day” response structures
• Assist response personnel as requested

Admin Triage Document
• Identifies, by program, topics; specific personnel; and/or processes established to handle a variety of issues
• In paper form now, soon to be electronically available for Admin use

Program Specific Response
• Utilized during “normal business hours”
• BSP- by topic or DLC team
• EMP- by topic or response person
• IHP- “day call” schedule or DLC team
• RPP- by DLC team or topic
• SP- by response person or topic

Interaction with DLC’s
• Notification to DLC’s EHS Coordinator required for all emergency response
• Notification to EHS Coordinator of any toxic gas alarm, regardless of outcome e.g. alarm with no release
• EHS Coordinators valuable resource in resolving emergency

Documentation
• Response events must be logged
• Electronic template currently on M drive, folders by year exist
• Laptop will replace the infamous “Black Bag”
• Technology working toward standardized form in SAP
• Reports from DLC’s should be attached to EHS files electronically
Resources

• **Response I-Pad with:**
  – Response SOP
  – Incident form template
  – MSDS database
  – EPC list (coming soon)
  – Current response team information
  – Wireless capability

• EHS Response flow chart
• EHS Admin triage chart
• EHS Admin resource document
• Pagers
• Group contact availability (future)