

Disaster Prevention

There are three tasks to perform before any meaningful analysis of an emergency response system can begin.

The first task is to identify the key processes and elements of the production process and to understand how operational processes are kept within safe bounds under normal conditions. Conceptually, it is the normal process instrumentation and control measures that provide the first and greatest degree of protection to plant employees and to the public. The four areas listed below identify some major subsystems or components which are commonly found in chemical plants. Each has a bearing on the safety of operations under normal and emergency conditions.

1. A management subsystem which includes management personnel, process specifications, plant design, standard operating procedures, and the written emergency plan.
2. A personnel subsystem which assigns and defines roles, for both normal and emergency operations, and provides appropriate training. This may also include labor/management safety committees.
3. A physical subsystem which may include transportation systems for materials, ventilation systems, waste removal systems, containment systems, refrigeration systems, storage areas, communications systems, and other process related equipment.
4. An emergency services subsystem including plant and community components.

A second task is to understand how critical failure points are identified, and what controls are used to ensure safe operations. This involves assessing the interrelation of the components and, particularly, identifying which safety features in the system should be backed up with alternative instrumentation, procedures, or equipment designed to ensure process variables are kept within safe limits.

The third task is to identify the emergency response system that is embedded in the operating system. Conceptually, it is a latent system that is active only when preventative measures have failed and an incident has occurred. This system is the most difficult to evaluate because:

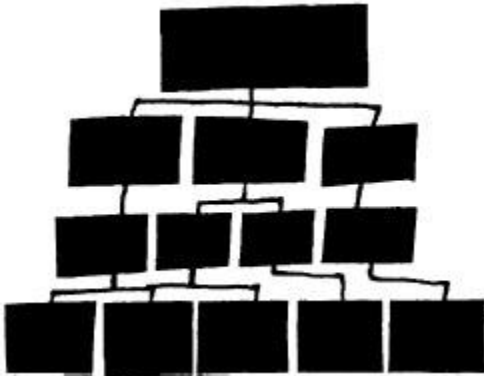
1. It is not observable except in emergencies.
2. The emergency response system also may involve resources and subsystems that lie wholly or partially outside of the physical or managerial boundaries of the chemical plant. For example, local firefighters may supplement in-plant fire brigades; local hospitals may provide care to injured workers in addition to in-plant first aid; local police may be involved with traffic control, evacuating of workers and community, and expediting communications and the flow of emergency and rescue equipment.
3. Finally, there is the question of defining the point at which the emergency system "shuts down" and normal operations begin after an emergency.

Plant Management

All the planning and preparation of safe plant operation is meaningless, unless it can be implemented. In the event of a problem, there is no time for committee or front office decisions. Correct decisions have to be made at the lowest organizational level possible, and those decisions have to be communicated to other affected personnel. This section is intended to establish whether those elements have been considered in the program.

1. Who is in charge? What are the lines of authority under normal operating conditions? in transition times, like during startup and shutdown procedures? In emergencies?

2. Can information be transmitted quickly and easily from: worker to supervisor? supervisor to worker?



3. How is information exchange accomplished during transition periods (starting and stopping work)?
4. Is operator jargon commonly and completely understood by those affected by the jargon? Examples: MIC -- methyl isocyanate, Black Betsy -- boiler, Monitor -- stationary firefighting nozzles.
5. Are signals clear? Are audible signals distinguishable and understood?
6. How has management with requirements of the OSHA Hazard Communication Standard (29 CFR 1910.1200)? Are monitoring records, training records, and material safety data sheets available?
7. Standard operating procedures should be examined and discussed. The process of updating these procedures -- including modifications, communication, and training -- should be understood.
8. Does a written emergency plan exist? It be discussed with management. It should be understood which contingencies are included in the plan, why they are included, and why management considers them to be adequate for the process, site, and situation.

The Personnel Subsystem

1. What are the job classifications of employees who work at the site? Are all job titles present on all work shifts? Are there potentially crucial omissions?
2. Are employees aware of their roles during emergencies? Are all critical tasks represented on all shifts?
3. Who is responsible for training employees? How often is training provided covering standard operating procedures? Emergency procedures? How is effectiveness of training evaluated by management?

The Physical Subsystem.

It is obviously to see the physical plant and to relate information contained in operating procedures, emergency plans, and "blueprints" with actual structures, materials, and processes. In inspecting the physical plant, the underlying question is "What keeps this operation -- or this phase of the operation -- within safe limits, including mechanical and electronic systems, human intervention, and routine maintenance activity?" Particular attention should be given to:

Plant Layout

Plant layout has some specific safety aspects. Examples include:

1. Separation and isolation

- Chemicals which may react with one another are to be physically separated, oxidizers are to be stored in areas remote from fuel storage.
- Areas of potential explosions storage of explosives, reaction vessels) are to be isolated so if there is an explosion, the damage and risk to employees is minimized.

2. Drainage

- Where hazardous liquids may leak or spill from piping or vessels, what provisions are made to prevent their spread to areas where employees may be exposed to the hazard? Examples of possible methods include diking and grading.
- Has the company made any provisions to control unexpected hazardous vapor or gas releases within the drain lines?

3. Housekeeping

- Are work areas well maintained?

4. Enclosed spaces

- Some processes which are safe in open air may become hazardous if enclosed. If areas of potential or frequent leaks or spills are enclosed to prevent environmental contamination or the spread of the chemical, are there adequate precautions to protect employees? Examples include ventilating the room and treating the exhaust; automatically sampling the air in the room or vault; having employees sample before entering the room.

Materials Compatibility

At least two factors should be considered in materials selection: First, will the contaminate or cause a reaction in the chemicals to be handled or processed? Second, will the chemicals to be processed attach or destroy the equipment? For all chemical processes: there are preferred materials; preferences sometimes are economic, and sometimes they are based on chemical reactivity or compatibility. The intent here is to identify readily available materials that might be used but that are incompatible with the chemicals involved. (For copper tubing should not be used with acetylene because it catalyzes a reaction in the acetylene.) These questions are pertinent to chemicals in all categories (i.e., health, flammability, reactivity). Among questions to be asked are:

1. Are any metals incompatible with the chemicals so that they should not be used for process equipment, piping, or storage systems?
2. Are any sealing materials for use in packing (e.g., pumps) or gaskets (e.g., flanges) incompatible with the chemicals so they should not be used in process equipment, piping, or storage systems?
3. If incompatible materials are identified; what procedures does the company have to ensure that only acceptable materials are used in new or refurbished equipment? Besides purchase order specifications, is there also inspection by plant personnel to ensure the specifications were followed?

Contamination Control

Potentially reactive chemicals may have their reactions catalyzed by common materials which easily enter systems whenever seals are opened. Examples include water or rust which may easily enter a system during transfer from one vessel to another, either during hookup or disconnect, or during pressurizing or venting of tanks.

1. If such potential catalysts are identified, how are they excluded from the system? Examples include:

- If vessels are pressurized by inert gases, are there filters in the gas lines to remove solid particles?
 - If vacuum relief or pressure relief valves are on the vessels, how are they protected so potentiality hazardous contaminant can enter through them when open?
2. When systems are opened for maintenance purposes, what precautions are taken to prevent contamination? What is done to safeguard the system while it is open? What precautions are taken to ensure that replacement parts are free of contaminants incompatible and/or incompatible materials? When connections are made and broken (e.g., during transfer from rail cars or trucks), what measures are taken to ensure contaminants do not enter the system?

Physical Facilities

Much plant equipment could be considered ancillary to the production processes. Examples of systems that may need to be present, properly inspected, and functional are:

1. Emergency eye wash or shower.
2. Fixed fire suppression equipment.
3. Portable firefighting equipment, if employees or a fire brigade are to use portable firefighting equipment.

Questions to be asked about these systems include: How often are they tested? What capacity do they have? Is the capacity sufficient for the anticipated emergency?

Inspection and Maintenance

All equipment must be shut down sometime, no matter how infrequently. When safety systems are shut down, what backup systems or procedures are available to provide replacement protection (e.g., stop process until safety systems are available again)? If shutoff valves can isolate safety relief valves, what measures ensure that the system is protected from over-pressurization (e.g., person stationed to monitor pressure)? What system is in place to ensure that maintenance of critical safety features are corrected immediately? What ensures that less critical features are corrected within a reasonable period?

Pressure vessels also need periodic inspection and testing because of normal wear and potential corrosion either at welds or in the base material. The combination of pressure and volume determine the hazard: high volume, low pressure systems can have the same potential energy for release as low volume, high pressure systems.

When potentially corrosive chemicals are used (e.g., acids, caustics), or the plant atmosphere is corrosive (e.g., near the ocean, or from chemical releases within the plant), what measures are taken to ensure system integrity? Examples include periodic pressure testing, x-ray, etc.

General Containment and Controls

During normal operations it is difficult if not impossible to keep material completely in a closed system. Vacuum must be relieved when a liquid level drops, and pressure must be relieved when the tank is refilled. For toxic, flammable, and reactive chemicals, the questions to be asked focus on minimizing such necessary releases and rendering the released chemicals harmless before discharge to the atmosphere. Examples of questions to be pursued include:

1. Where do emergency relief vents discharge? Are they piped to scrubbers, neutralizers, incinerators, precipitators, etc. to remove hazardous materials?

2. What precautions are taken to minimize spills when connections are broken? Is the line purged prior to the disconnect? Are purge gases treated? Are quick disconnects used? Do employees wear personal protective equipment (PPE) when disconnecting? Is there a dike or some method to collect and contain small spills or releases? Is the area ventilated and is ventilated air treated?

Material Handling

As long as chemicals are maintained in a closed system, they are safe and harmless. Chemical processes using hazardous chemicals should be designed to maintain that closed system. After design and maintenance, the only potential problems are: introduction of raw into the closed system and the removal of products (either the desired product for shipment or waste) from the closed systems. This section deals with those hazards.

1. How are raw materials received and shipped?
2. Are raw materials transfers accomplished in a closed system?
 - Who performs transfer (company or shipper)?
 - Is the system pressurized or blanketed?
 - Do critical systems have connections that are not interchangeable? Examples: potable water with process water? water and reactive chemicals? incompatible reactive chemicals?
3. How are unwanted products disposed of:
 - Vents: are vents properly directed?
 - Flare towers?
 - Scrubbers?
 - Ditches: properly lined? Where do they drain?
 - Tertiary treatment?
 - Are provisions made or considered to preclude incompatible chemical mixing in waste drainage?

Instrumentation

Suitable controls and instruments should be provided for both normal conditions of operation and for emergencies. Instrumentation includes sensors, indicators, recorders, and transmitters for measurements such as temperature, pressure, flow, liquid level, and analysis.

Many self-acting control devices, such as pressure regulators, normally fail in the open position, which may be the unsafe position. In such cases, emergency backup controls should be provided. In the case of pressure regulators, this includes pressure relieving devices down-stream and automatic shutoff valves interlocked with excess pressure switches.

1. Do instruments and controls consider failure in their design?

Examples: Control valves should be arranged so that, on loss of instrument air or actuating power, they will go into the safe position. Where loss of instrument air or power could lead to an unsafe condition, emergency air or power supplies should be provided.

2. Are instruments made of material capable of withstanding the corrosive or erosive conditions to which they are subjected?
3. Do instrument sensors measure the true status of the system they are designed to protect or control?
4. Examples: In a large reactor, many thermocouples may be needed since the temperature may not be uniform throughout. In sensing liquid flow through a pipe, a flow switch in the pipe is more reliable than monitoring power supply to a pump.
5. Are grouped instrument leads and control locations protected against exposure to explosion, fire, or toxic chemicals where they are critically needed to shut down the process safely? In addition to normal controls, are accessible emergency controls provided by which pumps or automatic valves controlling the flow of flammable liquids could be operated in event of fire?
6. Are all indicating dials, indicating lights, recorders, alarms, and switches which affect process safety conspicuously labeled as to their function and meaning?
7. Are instruments constructed and installed so that they can be easily inspected and maintained?
8. Are separate safety control and interlock systems relied upon rather than relying on the production process control system for safety supervision of the process?
9. Are instruments in hazardous areas (as defined in National Electrical Code) intrinsically safe or or enclosed so that they will not act as ignition sources?
10. Are critical measurements recorded (as is preferable) rather than merely indicated by lights or dials so that rate of change in processes will be more readily evident, and greater management supervision can be maintained over operator practices?
11. Do important control valves have steel bodies and are they yoked to withstand fire exposure, impact, and vibration?
12. How often is routine maintenance or replacement performed on key instruments?

Piping Systems

Piping and instrument diagrams are used to follow the formulation or reaction process and also to check safety devices and system protections. Questions that may be asked include:

1. Do reaction vessels, storage tanks, or pressure vessels have safety relief devices to prevent over-pressurization?
2. Are there shutoff valves that can render safety relief devices ineffective? If so, what additional precautions are taken?
3. Where do materials vent when released through the safety relief devices?
4. If there is a loss of electrical or pneumatic power, do controls fail in a mode that is safe?
5. Will instrumentation detect leaks and spills? (E.g., when material is being pumped from one vessel to another, is there any check to assure that as the level falls in one vessel, it rises in the other?)
6. Are temperature or liquid level controls or alarms provided?

7. Are piping, valves, and fittings designed according to the recognized standards for the working pressures, temperatures, structural stresses, and chemical conditions to which may be subjected? Is non-destructive testing conducted routinely to ensure that minimum wall thicknesses are maintained?
8. Is piping well-supported and protected against physical damage?
9. Are pipe lines for reactive chemicals pitched to drain, with drain valves at low points?
10. Are main shutoff valves which can affect the safety of the system conspicuously labeled?
11. Do shutoff valves indicate their "open" or "shut" position?
12. Where improper operations or leaking of valves can lead to a hazardous situation, are interlocked valves or double valves and vents used to minimize hazard?

Protective Systems (not quality control)

1. Heating or cooling systems may be for product control or for safety control. Cooling may be necessary to prevent a runaway reaction in reaction vessels. Reactive chemicals also may be cooled in storage to provide more time to respond to an initiated reaction.
 - What protective devices are there for the heating or cooling systems? temperature alarms? backup systems or redundancies? procedural controls?
 - Are heat transfer materials for heating or cooling incompatible with reactive materials?
 - Is refrigeration automatically actuated in emergencies?
 - Are manual valves located in safe areas?
 - Are intermittent power failures considered and backup provisions implemented?
2. Are there explosion suppression systems? How are they tested and maintained?
3. Are systems inerted to exclude contaminants which may be catalysts or reactive materials? Examples include:
 - Passivating vessels and piping or components (before system startup).
 - Providing an inert gas atmosphere such as a nitrogen blanket on flammable materials.
 - Submerging reactive materials (such as sodium in kerosene).

Fired Systems

Do furnaces and heaters have:

1. Adequate draft?
2. Positive fuel ignition?
3. Combustion safeguards?
4. Fuel controls?

5. Water or liquid level indicators?
6. Pressure relief devices?
7. High temperature alarms?
8. Emergency shutoff facilities?
9. Backflow protection?

Electrical Equipment

All wiring and electrical equipment in chemical plants must be installed in accordance with the National Electrical Code. Equipment used must be approved where applicable.

1. Proper installation and maintenance is essential.
2. Adequate clearance or insulation should be provided between conduits and hot surfaces to prevent damage to the wiring insulation.
3. Equipment must be properly grounded and/or bonded in hazardous areas to minimize static electricity, both within and outside of equipment. Are other appropriate steps taken to prevent buildup of a static charge?
4. Equipment should be shielded from lightning by protective ground wires, rods, or masts.

Pressure Vessels and Storage Tanks

The design and construction of pressure vessels and storage tanks must be in accordance with accepted engineering principles.

1. Pressure vessels must be designed and constructed in accordance with applicable codes, standards, state and local laws, and regulations.
 - Vessels should be equipped with overpressure protection as required. Vents should be arranged to discharge to a point where ignition of escaping vapors or liquids will not seriously expose personnel, the equipment, or structures. Relief devices should be kept free of corrosion or fouling and should be operable at all times.
 - Often an inert atmosphere is maintained in a vessel or tank to keep the atmosphere out of the flammable range. The consequences of contamination or failure to use an inert gas should be analyzed and equipment or procedures should be devised to cover the situation.
 - Unprotected sight glasses should be avoided in process equipment wherever possible.
2. Storage tanks be designed based on the quantity, pressure, reactivity, and corrosiveness of the material stored. The design should include overpressure equipment and vents and should consider the interrelationship of each part of the overall system, e.g., the effect of a gasket which blows out at 25 psi at one point in the system when the relief valves are set at 60 psi.

Pumps and Compressors

Pumps and compressors are the work horses of chemical plants for moving every type of liquid and gas.

1. Failure of moving parts or packing glands can cause escape of flammable or toxic liquids or gases. Remotely controlled switches and shutoff valves are needed to control the flow of fuel in an emergency.
2. Equipment used for transfer of flammable vapors or gases should be installed to minimize vibration and thus to avoid loosening of fittings and joints.

Response to Emergencies

General Principles

Assessing the adequacy of a written emergency plan is an art, not a science. It involves judgment as to the reasonableness of the assumptions underlying the plan (e.g., what is a reasonable worst-case estimate?) as well as the adequacy of countermeasures designed to protect life and to limit environmental and property damage.

A few general principles may be useful in approaching this task:

1. Are the priorities of the plan clearly stated as to -- safety of plant personnel and the public? control of hazard? minimizing damage to property?
2. Does the plan deal with with reasonable accident scenarios (minor incident to "worst case")?
3. Is the plan practical?
4. Is the plan simple?
5. Is the plan easy to understand?
6. Will it deal with any type of emergency? For example, are contingencies included for: fire and explosion? release of highly toxic materials? large chemical spills? acts of nature? sabotage including bomb threats, etc.?
7. Has attention been given to emergencies which may occur during inclement weather?
8. Is the plan updated periodically, e.g., annually or whenever processes, procedures, or key personnel change?
9. Are there emergency drills or simulations involving all members of the response team including public agencies?
10. Are responses reviewed to determine areas where improvement is needed?
11. How are the results of the drill evaluations communicated to the employees?
12. Are drills conducted for all shifts?
13. Are safety responsibilities a "critical element" in supervisors' performance standards? For example, how is safety performance considered relative to production demands and is it factored into performance appraisals?
14. Has plant management worked with community leaders to develop an appropriate public response plan?

Control and Coordination

When assessing the adequacy of a written emergency plan, questions concerning control and coordination include:

1. Will one person be designated to coordinate all efforts? Is there always an individual onsite who has been trained and has the ability to take the initial actions necessary to minimize the emergency?
2. Has there been prior consideration/coordination of all potential response groups or agencies such that there will not be loss of control due over-or underresponse?
3. Does the the safety committee have oversight relative to the plan? Are employee representatives an integral part of the committee? Are members involved in plant audits? How do they receive feedback on action taken relative to their recommendations?
4. Has the plan been distributed to:
 - All key personnel up and down the company chain of command including employee representatives and the switchboard operator?
 - Police officials?
 - Fire officials and paramedics?
 - Local government?
 - Hospitals and physicians?
 - Mutual aid industries?
 - Utility companies?
5. When changes are made in the emergency plan, have provisions been established to communicate those changes to individuals with a need to know?
6. What mechanisms exist to allow the reporting of unsafe acts or unauthorized employees in high hazard areas?
7. Will a control center be established in a safe location? Alternatively: are process control centers already established in safe locations, with appropriate architecture and support systems?
8. Are procedures in place for notifying transient personnel on the site, such as delivery and shipping services, an emergency through the most likely site contacts (e.g., shipping, receiving sections)?
9. Are emergency rosters and call out plans developed?
10. Are emergency service listings and phone numbers developed and distributed? Does the switchboard operator have a copy? Do all phones have a brief listing of immediately needed emergency numbers posted on them?
11. Are organizational charts developed and distributed for day-to-day operators and emergency operators?
12. Are lists of raw materials, intermediates, products, and their locations within the plant provided with the plan?

- Are the associated hazardous chemicals listed in accordance with the OSHA Communication Standard?
 - Are flammable, reactive, physical, radioactive, and other hazards listed?
13. Are appropriate disposal methods listed?
14. Are current maps, flow diagrams, and blueprints part of the plan? overall site map? adjoining city and/or state maps including local topography?
15. Will additional security be needed and planned for?
- Will strict accountability of personnel entering and leaving the area be maintained?
 - Will only authorized personnel be granted entry?
 - Will traffic control be a problem?
 - Are certain areas of the site more vulnerable to sabotage?

Procedures

The questions concerning the procedures set forth in a written emergency include

1. Are condensed instructions (such as checklists for evacuation or shutdown) part of the written plan?
2. Are designated duties and alternate duties of each person clearly and briefly described? Are vacations, holidays, weekends, and 2nd and 3rd shift situations considered?
3. Have procedures been established for employees who remain on site to perform critical operations during emergency situations?
4. Have responsibilities and procedures been established for those who are assigned rescue or firefighting duties? Are these employees required to take physical examinations which demonstrate their fitness to perform such duties? If so, how frequently are these examinations administered?
5. If the company has elected to use a fire brigade are the appropriate requirements of 29 CFR 1910.156 being met?
6. What is the company's position on the use and availability of fire extinguishers?
7. Are rescue teams formally trained in search and rescue procedures? Are they familiar with the location of utility disconnects and all evacuation routes? Are they provided with appropriate PPE and trained in first aid/emergency medical treatment? Are they provided with communication equipment? Are rescue/response personnel provided with a properly equipped vehicle(s) to reduce response time?
8. Are documents readily available for reference in an emergency? Are decision logic (decision making) charts (or other documents) formulated for planning and executing the following activities:
 - Selection of protective clothing?
 - Selection of respiratory protection?
 - Emergency shutdown of equipment?
 - Evacuation of the plant?
 - Evacuation of the surrounding populace?

- How did management arrive at these decisions?
9. Have definite volumes of air contaminants been established which, when released, trigger either onsite and/or offsite emergencies?
 10. Have dispersion models been calculated to assist in planning of evacuation? If not, how does management deal with a hazard that is spreading into new areas of the plant and the community?
 11. Are employees or recovery personnel trained and are procedures in place for monitoring the site and adjacent areas to identify levels of contaminants as well as their location (atmosphere/land/water) and direction of travel.
 12. Is emergency equipment provided in adequate quantities and placed in useable locations; e.g., emergency power generators for emergency lighting and shutdowns; pumps and valves located for supplying water to fight fires; PPE, safety showers connected to alarms, etc.?
 - Is emergency equipment checked, tested, and calibrated periodically for operational readiness?
 - Are personnel trained and experienced in its use?
 - Is emergency equipment of appropriate type for any emergency which may occur?
 13. Are local emergency response personnel brought into the site periodically for familiarization?
 - Are potential problem areas and processes pointed out and discussed?
 - Are locations where personnel normally work pointed out?
 14. Are primary and backup two-way communication systems developed and in place? Are they vulnerable to power failure or other disruption? Do ambient plant noise levels interfere with voice communication?
 15. Is mutual aid equipment that might be borrowed in an emergency compatible with site equipment?
 16. Is there a written spill control plan, e.g., containment, neutralization, disposal, appropriate PPE, etc.?
 17. Are incompatibilities of released material anticipated?
 18. Are normally innocuous materials likely to become hazardous due to an emergency? For example, any materials which are water reactive would influence the method of firefighting; certain materials when heated release hazardous levels of toxic substances not existing during normal conditions, etc.

Are hospitals, physicians, and other medical/paramedical staff provided with:

- Lists of hazardous chemicals and Material Safety Data Sheets?
 - Acute symptoms?
 - Delayed symptoms?
 - Bioassay tests?
 - Special treatment required?
19. Have local health care professionals been involved in the development or review of the plan?

20. Is public information planned and is one person designated as spokesperson to avoid speculation and panic? coordinated with other responding groups?
21. Are there formal accident and near-miss investigation responsibilities and procedures developed? What is the policy on investigating injury versus non-injury accidents? Are reports required? Are causal analyses performed?
22. Has any consideration been given to potential sewer contamination during an emergency/disaster, e.g., introduction of or toxic materials into the system?

Recordkeeping Requirements

The Secretary of Labor has said that "the cornerstone of any successful, effective safety and health program is accurate and complete recordkeeping." Because of its importance, OSHA places special importance on recordkeeping.

Employers of 11 or more employees must maintain records of occupational injuries, illnesses, and deaths as they occur. The purposes of keeping such records are to inform employees of the effectiveness of their employer's safety and health program, to permit the Bureau of Labor Statistics to complete survey material, and to help define hazardous industries.

In addition, while the following items are not required for all OSHA standards, they should be recorded to accurately monitor and assess occupational hazards.

Initial and periodic monitoring, including the date of measurement, operation involving exposure, sampling and analytical methods used and evidence of their accuracy: number, duration, and results of samples taken: type of respiratory protective devices worn: and name, social security number, and the results of all employee exposure measurements. This record should be kept for 30 years.

Employee physical/medical examinations, including the name and social security number of the employee; physician's written opinions: any employee medical complaints related to exposure to toxic substances: and information provided to the examining physician. These records should be maintained for the duration of employment plus 30 years.

Employee Training. These records should be kept for one year beyond the last date of employment by that employee.

All records should be made available, upon request, to the OSHA Assistant Secretary, the Directory of NIOSH, affected employees, former employees, and designated representatives.

Training

An adequate emergency plan will address a training program. The following questions apply:

1. Are supervisors trained periodically? Are front line supervisors and employees involved in plan review and development in their areas?
2. Have employees and front line supervisors been trained in the recognition of early warning signs (e.g., unusual odors or sounds, signs and symptoms of exposure, unusual vessel temperature or pressure readings, leaks, vibration, etc.)?
3. Is safety and emergency plan training provided to all new employees and all other employees who assume a new job? How often is emergency response training repeated?
4. Are front line supervisors involved in training employees? To what extent?
5. Is there a method to evaluate training?

6. Are contractors who come on site required to undergo specific training in hazards and precautions?

Evacuation

It is essential that an effective plan for evacuation of during an emergency situation be included in the overall written emergency plan. Questions concerning this aspect of the plan include:

- Are decision logic charts available such that supervisors on each shift could make an informed decision to evacuate the site?
- Are decision logic charts available such that the supervisors on each shift could provide local authorities the information necessary to decide when to evacuate the surrounding population?
- Has cooperation of the local weather bureau been coordinated to predict temperature, winds, inversion levels, and other meteorologic conditions that could affect gas or vapor concentrations?
- Are formulas or dispersion models provided for calculating concentrations of air contaminants down wind?
- Have evacuation routes inside and outside the plant been planned and coordinated with local authorities?
 - Have employees and the local populace been informed of the routes to be used?
 - Are primary and alternate evacuation routes clearly indicated in the plan?
- Are detection and alarm systems provided, e.g., for fire or toxic release?
 - Are there any periodic checks to ensure that detection and alarm systems are maintained in operable conditions?
 - Do alarm systems meet the requirements, as appropriate, of 29 CFR 1910.165?
- Are evacuation instructions and signals for evacuation clear and understood by employees and by the surrounding popuiace?
- Have provisions been made for the evacuation of handicapped persons?
- Have "safe distances" been considered when regrouping areas were designated?
- Have evacuation wardens been designated?
- Are supervisors on each shift capable of executing the entire plan on their own?
- Are employees instructed to proceed to regrouping points located cross wind from the source and at a "safe distance" from the danger zone? Are the regrouping points well known by employees? Have restrictive topographical conditions been considered?
 - Is there a wind sock or wind vane on the site to determine wind direction?
 - Is a complete copy of the emergency plan located in a safe place?
 - Are adequate supplies and equipment located at these points?
 - Are key personnel designated to make accountability checks at the regrouping points and to report the medical conditions of present and the names of those missing?

- Are adequate communication systems available at these points?

Reentry and Cleanup

When evaluating plans for reentry and cleanup of an area which has been evacuated due to an emergency situation, the following questions should be considered:

1. Will safe levels for reentry be determined through environmental sampling by competent persons?
2. Are chemical residues likely to present a hazard?
3. Could the disaster have created unstable chemicals?
4. Are "booby traps" likely to be present from the incident?
 - Hangup?
 - Unstable structures?
 - Developed pressure in pipes, vessels, containers, and pumps?
5. Are employees qualified to do cleanup tasks? Will greater hazards likely result from attempting to maintain their employment rather than with contract companies who are experienced in the required tasks?
6. How is equipment decontaminated?
7. Is critical safety equipment on hand prior to startup operations?

APPENDIX I

Toxic Chemicals

The following list was developed as part of an international effort to identify chemical hazards. OSHA adopted the list as published in 1985 by the International Labor Organization as an aid in ranking hazards for inspection targeting purposes.

1. 4-Aminodiphenyl
2. Benzidine
3. Benzidine salts
4. Dimethylnitrosamine
5. 2-Naphthylamine
6. Beryllium (powders, compounds)
7. Bis(chloromethyl)ether
8. 1,3-Propanesultone
9. 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)
10. Arsenic pentoxide, Arsenic (V) acid and salts
11. Arsenic trioxide, Arsenious (III) acid and salts
12. Arsenic hydride (Arsine)
13. Dimethylcarbamoyl chloride
14. 4-(Chloroformyl) morpholine
15. Carbonyl chloride (Phosgene)
16. Chlorine
17. Hydrogen sulphide
18. Acrylonitrile
19. Hydrogen cyanide

20. Carbon disulphide
21. Bromine
22. Acetylene (Ethyne)
23. Hydrogen
24. Ethylene oxide
25. Propylene oxide
26. 2-Cyanopropan-2-ol (Acetone cyanohydrin)
27. 2-Propenal (Acrolein)
28. 2-Propen-1-ol (Allyl alcohol)
29. Allylamine
30. Antimony hydride (Stibine)
31. Ethyleneimine
32. Formaldehyde (concentration $\geq 90\%$)
33. Hydrogen phosphide (Phosphine)
34. Bromomethane (Methyl bromide)
35. Methyl isocyanate
36. Nitrogen oxides
37. Sodium selenite
38. Bis(2-chloroethyl) sulphide
39. Phosacetim
40. Tetraethyl lead
41. Tetramethyl lead
42. Promurit (1-(3,4-Dichlorophenyl)3-triazenethio-carboxamide)
43. Chlorfenvinphos
44. Crimidine
45. Chloromethyl methyl ether
46. Dimethyl phosphoramidocyanidic acid
47. Carbophenothion
48. Dialifos
49. Cyanthoate
50. Amiton
51. Oxydisulfoton
52. OO-Diethyl S-ethylsulphinylmethyl phosphorothioate
53. OO-Diethyl S-ethylsulphonylmethyl phosphorothioate
54. Disulfoton
55. Demeton
56. Demeton
57. Phorate
58. OO-Diethyl S-phosphorodithioate
59. OO-Diethyl S-isopropylthiomethyl phosphorodithioate
60. Pyrazoxon
61. Pensulfothion
62. Paraoxon (Diethyl 4-nitrophenyl phosphosphate)
63. Parathion
64. Azinphos-ethyl
65. oo-Diethyl S-propylthiomethyl phosphorodithioate
66. Thionazin
67. Carbofuran
68. Phosphamidon
69. Tirpate (2,4-Dimethyl-1,3-dithiolane-2-carboxaldehydeO-methylcarbamoyloxime)
70. Mevinphos
71. Parathion-methyl
72. Azinphos-methyl
73. Cycloheximide
74. Diphacinone
75. Tetramethylenedisulphotetramine

76. EPN
77. 4-Fluorobutyric acid>
78. 4-Fluorobutyric acid, salts
79. 4-Fluorobutyric acid, esters
80. 4-Fluorobutyric acid, amides
81. 4-Fluorocrotonic acid
82. 4-Fluorocrotonic acid, salts
83. 4-Fluorocrotonic acid, esters
84. 4-Fluorocrotonic acid, amides
85. Fluoroacetic acid
86. Fluoroacetic acid, salts
87. Fluoroacetic acid, esters
88. Fluoroacetic acid, amides
89. Fluenetil
90. 4-Fluoro-2-hydroxybutyric acid
91. 4-Fluoro-2-hydroxybutyric acid, salts
92. 4-Fluoro-2-hydroxybutyric acid, esters
93. 4-Fluoro-2-hydroxybutyric acid, amides
94. Hydrogen fluoride
95. Hydroxyacetonitrile (Glycolonitrile)
96. 1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin
97. Isodrin
98. Hexamethylphosphoramide
99. Juglone (5-Hydroxynaphtalene,1-4-dione)
100. Warfin
101. 4,4'-Methylenebis (2-chloroaniline)
102. Ethion
103. Aldicarb
104. Nickel tetracarbonyl
105. Isobenzan
106. Pentaborane
107. 1-Propen-2-chloro-1.3-diol-diacetate
108. Propyleneimine
109. Oxygen difluoride
110. Sulphur dichloride
111. Selenium hexafluoride
112. Hydrogen selenide
113. TEPP
114. Sulfotep
115. Dimefox
116. 1-Tri(cyclohexy)stannyl-1H-1,2,4-triazole
117. Triethylenemelamine
118. Triethylenemelamine
119. Cobalt (powders, compounds)
120. Nickel (powders, compounds)
121. Anabasine
122. Tellurium hexafluoride
123. Trichloromethanesulphenyl chloride
124. 1,2-Dibromethane (Ethylene dibromide)
125. Flammable substances as defined in Annex IV (c)(i)
126. Flammable substances as defined in Annex IV (c)(ii)
127. Diazodinitrophenol
128. Diethylene glycol dinitrate
129. Dinitrophenol, salts
130. 1-Guanyl-4-nitrosaminoguanyl-1-tetrazene
131. Bis (2,4,6-trinitrophenyl)amine

132. Hydrazine nitrate
133. Nitroglycerine
134. Pentaerythritol tetranitrate
135. Cyclotrimethylene trinitramine
136. Trinitroaniline
137. 2,4,6-Trinitroanisole
138. Trinitrobenzene
139. Trinitrobenzoic acid
140. Chlorotrinitrobenzene
141. N-Methyl-N,2,3,4-N-tetranitroamiline
142. 2,4,6-Trinitrophenol (Picric acid)
143. Trinitrocresol
144. 2,4,6-Trinitrophenetold
145. 2,4,6-Trinitroresorcinol (Styphnic acid)
146. 2,4,6-Trinitrotoluene
147. Ammonium nitrate ¹
148. Cellulose nitrate (containing > 12.6% nitrogen)
149. Sulphur dioxide
150. Hydrogen chloride (liquified gas)
151. Flammable substances as defined in Annex IV (c)(iii)
152. Sodium chlorate ¹
153. tert-Butyl peroxyacetate (concentration \geq 70%)
154. tert-Butyl peroxyisobutrate (concentration \geq 80%)
155. tert-Butyl peroxy maleate (concentration \geq 80%)
156. tert-Butyl peroxy isopropyl carbonate (concentration \geq 80%)
157. Dibenzyl peroxydicarbonate (concentration \geq 90%)
158. 2,2-Bis (tert-butylperoxy) butane (concentration \geq 70%)
159. 1,1-Bis (tert-butylperoxy) cyclohexane (concentration \geq 80%)
160. Di-sec-butyl peroxydicarbonate (concentration \geq 80%)
161. 2,2-Dihydroperoxypropane (concentration \geq 30%)
162. Di-n-propyl peroxydicarbonate (concentration \geq 80%)
163. 3,3,6,6,9,9-Hexamethyl-1,2,4,5-tetroxacyclononane (concentration \geq 75%)
164. Methyl ethyl ketone peroxide (concentration \geq 60%)
165. Methyl isobutyl ketone peroxide (concentration \geq 60%)
166. Peracetic acid (concentration \geq 60%)
167. Lead axide
168. Lead 2,4-6-trinitroresorcinoxide (Lead sytphnate)
169. Mercury fulminate
170. Cyclotetramethylenetetranitramine
171. 2,2',4,4',6,6'-Hexanitrostilbene
172. 1,3,5-Triamino-2,4,6-Trinitrobenzene
173. Ethylene glycol dinitrate
174. Ethyl nitrate
175. Sodium picramate
176. Barium azide
177. Di-isobutryl peroxide (concentration \geq 50%)
178. Diethyl peroxydicarbonate (concentration \geq 30%)
179. tert-Butyl peroxy pivalate (concentration \geq 77%)

¹ Where this substance is in a state which gives it properties capable of creating a major-accident hazard.

Acutely Toxic Chemicals

The Environmental Protection Agency published this comprehensive list of acutely toxic chemicals in November, 1985 to help identify hazardous chemicals in use in the United States. This alphabetical list contains the chemical name as well as the Chemical Abstract Service (CAS) number.

Common Name	CAS Codes
Acetone cyanohydrin	75865
Acetone thiosemicarbazide	1752303
Acrolein	107028
Acrylyl chloride	814686
Aldicarb	116063
Aldrin	309002
Allyl alcohol	107186
Allylamine	107119
Aluminum phosphide	20859738
Aminopterin	54626
Amiton	78535
Amiton oxalate	3734972
Ammonium chloroplatinate	16919-58-7
Amphetamine	300629
Aniline, 2,4,6-trimethyl-	88051
Antimony pentafluoride	7783702
Antimycin A	1397940
ANTU	86884
Arsenic pentoxide	1303282
Arsenous oxide	1327533
Arsenous trichloride	7784341
Arsine	7784421
Azinphos-ethyl	2642719
Azinphos-methyl	86500
Aziridine	151564
Bacitracin	01405-87-3
Benzenamine, 3-(trifluoromethyl)-	98168
Benzene, 1-(chloromethyl)-4-nitro-	100141
Benzeneearsoinc acid	00098-05-5
Benzenesulfonyl chloride	98099
Benzotrichloride	98077
Benzoyl chloride	98884
Benzyl chloride	100447
Bicyclo[2.2.1]heptane-2-carbonitrile, 5-chloro-6-(((methylamino)carbonyl)oxy)imino)-, (1-alpha,2-beta,4-alpha,5-alpha,6E)-	15271417
Bis(chloromethyl) ketone	534076
Bitoscanate	4044659
Boron trichloride	10294345
Boron trifluoride	7637072
Boron trifluoride compound with methyl ether (1:1)	353424
Bromadiolone	28772567
Butadiene	106990
Butyl isovalerate	00109-19-3
Butyl vinyl ether	00111-34-2
C.I. basic green 1	00633-03-4
Cadmium oxide	1306190
Cadmium stearate	2223930
Calcium arsenate	7778441
Campechlor	8001352
Cantharidin	56257

Carbachol chloride	51832
Carbamic acid, methyl-, O-(((2,4-dimethyl-1,3-dithiolan-2-yl)methylene)amino)-	26419738
Carbofuran	1563662
Carbophenothion	786196
Carvone	02244-16-8
Chlordane	57749
Chlorfenvinfos	470906
Chlorine	7782505
Chlorine dioxide	10049044
Chlorine monoxide	7791211
Chlorine oxide	7791211
Chlorine oxide (ClO ₂)	10049044
Chlormephos	24934916
Chlormequat chloride	999815
Chloroethanol	107073
Chloroethyl chloroformate	627112
Chloromethyl ether	542881
Chloromethyl methyl ether	107302
Chlorophacinone	3691358
2-Chlorophenol	95578
Chloroxuron	1982474
Chlorthiophos	21923239
Chromic chloride	10025737
Cobalt	7440484
Cobalt carbonyl	10210681
Cobalt, ((2,2'-(1,2-ethanediy)bis(nitrilomethylidyne))bis(6-fluorophenylato))(2-)-N,N',O,O'-	62207765
Colchicine	64868
Coumaphos	56724
Coumatetralyl	5836293
Cresylic acid	00095-48-7
Crimidine	535897
Crotonaldehyde	4170303
Crotonaldehyde, (E)-	123739
Cyanogen bromide	506683
Cyanogen iodide	506785
Cyanophos	2636262
Cyanuric fluoride	675149
Cycloheximide	66819
Cyclopentane	00287-92-3
Decaborane	17702419
Demeton	8065483
Demeton-S-methyl	919868
Dialifos	10311849
Diborane	19287457
Dibutyl phthalate	84742
Dichlorobenzalkonium chloride	08023-53-8
Dichloroethyl ether	111444
Dichloromethylphenylsilane	149746
Dichlorvos	62737
Dicrotophos	141662
Diepoxybutane	1464535
Diethyl chlorophosphate	814493
Diethyl-p-phenylenediamine	00093-05-0
Diethylcarbazine citrate	01642-54-2
Digitoxin	71636
Diglycidyl ether	2238075
Digoxin	20830755
Dimefox	115264
Dimethoate	60515

Dimethyl phosphorochloridothioate	2524030
Dimethyl phthalate	131113
Dimethyl sulfate	77781
Dimethyl sulfide	75183
Dimethyl-p-phenylenediamine	99989
Dimethyldichlorosilane	75785
Dimethylhydrazine	57147
Dimetilan	644644
Dinitrocresol	534521
Dinoseb	88857
Dinoterb	1420071
Diocetyl phthalate	11784
Dioxathion	78342
Dioxolane	64606
Diphacinone	82666
Diphosphoramidate, octamethyl-	152169
Disulfoton	298044
Dithiazanine iodide	514738
Dithiobiuret	541537
EPN	2104645
Ementine, dihydrochloride	316427
Endosulfan	115-29-7
Endothion	320777
Endrin	72208
Ergocalciferol	50146
Ergotamine tartrate	379793
Ethanesulfonyl chloride, 2-chloro-	1622328
Ethanol, 1,2-dichloro-, acetate	10140871
Ethion	563122
Ethoprophos	13194484
Ethyl thiocyanate	542905
Ethyl dipropylthiocarbamate	759944
Ethylbis(2-chloroethyl)amine	538078
Ethylene fluorohydrin	371620
Ethylenediamine	107153
Ethyleneimine	151564
Ethylmercuric phosphate	2235258
Fenamiphos	22224926
Fenitrothion	122145
Fensulfothion	115902
Fluenetil	4301502
Fluorine	7782414
Fluoroacetamide	640197
Fluoroacetic acid	144490
Fluoroacetyl chloride	359068
Fluorouracil	51218
Fonofos	944229
Formaldehyde cyanohydrin	107164
Formetanate	23422539
Formothion	2540821
Formparanate	17702577
Fosthietan	21548323
Fuberidazole	3878191
Furan	110009
Gallium trichloride	13450903
Hexachlorocyclopentadiene	77474
Hexachloronaphthalene	1335871
Hexamethylenediamine, N,N'-dibutyl-	4835114
Hydrazine	302012

Hydrocyanic acid	74908
Hydrogen fluoride	7664393
Hydrogen selenide	7783075
Indomethacin	53861
Iridium tetrachloride	10025975
Iron, pentacarbonyl	13463406
Isobenzan	297789
Isobutyronitrile	78820
Isocyanic acid, 3,4-dichlorophenyl ester	102363
Isodrin	465736
Isofluorophate	55914
Isophorone diisocyanate	4098719
Isopropyl chloroformate	108236
Isopropyl formate	625558
Isopropylmethylpyrazolyl dimethylcarbamate	119380
Lactonitrile	78977
Leptophos	21609905
Lewisite	541253
Lindane	58899
Lithium hydride	7580678
Malononitrile	109773
Manganese, tricarbonyl methylcyclopentadienyl	12108133
Mechlorethamine	51752
Mephosfolan	950107
Mercuric acetate	1600277
Mercuric chloride	7487947
Mercuric oxide	21908532
Mesitylene	108678
Methacrolein diacetate	10476956
Methacrylic anhydride	760930
Methacrylonitrile	126987
Methacryloyl chloride	920467
Methacryloyloxyethyl isocyanate	30674807
Methamidophos	10265926
Methanesulfonyl fluoride	558258
Methidathion	950378
Methiocarb	2032657
Methomyl	16752775
Methoxyethylmercuric acetate	151382
Methyl 2-chloroacrylate	80637
Methylene disulfide	624920
Methyl isocyanate	624839
Methyl isothiocyanate	556616
Methyl mercaptan	74931
Methyl phenkapton	3735237
Methyl phosphonic dichloride	676971
Methyl thiocyanate	556649
Methyl vinyl ketone	78944
Methylhydrazine	60344
Methylmercuric dicyanamide	502396
Methyltrichlorosilane	75796
Metolcarb	1129415
Mevinphos	7786347
Mexacarbate	315184
Mitomycin C	50077
Molinate	2212671
Monocrotophos	6923224
Muscimol	2763964
Mustard gas	505602

Nickel	7440020
Nickel carbonyl	13463393
Nicotine	54115
Nicotine sulfate	65305
Nitric acid	7697372
Nitric oxide	10102439
Nitrocyclohexane	1122607
Nitrogen dioxide	10102440
Nitrosodimethylamine	62759
Norbormide	991424
Organorhodium Complex (PMN-82-147)	0
Orotic acid	65861
Osmium tetroxide	20816120
Ouabain	630604
Oxamyl	23135220
Oxetane, 3,3-bis(chloromethyl)-	78717
Oxydisulfoton	2497076
Ozone	10028156
Paraquat	1910425
Paraquat methosulfate	2074502
Paris green	12002038
Pentaborane	19624227
Pentachloroethane	76017
Pentachlorophenol	87865
Pentadecylamine	2570265
Peracetic acid	79210
Perchloromethyl mercaptan	594423
Phenarsazine oxide	58366
Phenol	108952
Phenol, 2,2'-thiobis[4-chloro-6-methyl-	4418660
Phenol, 2,2'-thiobis[4,6-dichloro-	97187
Phenol, 3-(1-methylethyl)-, methylcarbamate	64006
Phenylene dichloroarsine	696286
Phenylhydrazine hydrochloride	59881
Phenylmercury acetate	62384
Phenylsilatrane	2097190
Phenylthiourea	103855
Phorate	298022
Phosacetim	4104147
Phosfolan	947024
Phosmet	732116
Phosphamidon	13171216
Phosphine	7803512
Phosphonothioic acid, methyl-, O-ethyl O-(4-(methylthio)phenyl) ester	2703131
Phosphonothioic acid, methyl-, S-(2-(bis(1-methylethyl)amino)ethyl) O-ethyl ester	50782699
Phosphoric acid, dimethyl 4-(methylthio) phenyl ester	3254635
Phosphorothioic acid, O,O-diethyl-O-(4-nitrophenyl) ester	56382
Phosphorous trichloride	7719122
Phosphorus	7723140
Phosphorus oxychloride	10025873
Phosphorus pentachloride	10026138
Phosphorus pentoxide	1314563
Phylloquinone	84800
Physostigmine	57476
Physostigmine, salicylate (1:1)	57647
Picrotoxin	124878
Piperidine	110894
Piprotal	5281130
Pirimifos-ethyl	23505411

Platinous chloride	10025657
Platinum tetrachloride	134961
Potassium arsenite	10124502
Potassium cyanide	151508
Potassium silver cyanide	506616
Promecarb	2631370
Propargyl bromide	106967
Propiolactone, .beta.-	57578
Propionitrile	107120
Propionitrile, 3-chloro-	542767
Propyl chloroformate	109615
Propylene glycol, allyl ether	1331175
Propyleneimine	75558
Prothoate	2275185
Pseudocumene	95636
Pyrene	129000
Pyridine, 4-amino-	504245
Pyridine, 2-methyl-5-vinyl-	140761
Pyridine, 4-nitro-, 1-oxide	1124330
Pyriminil	53558251
Rhodium trichloride	10049077
Salcomine	14167181
Sarin	107448
Selenious acid	7783008
Selenium oxychloride	7791233
Semicarbazide hydrochloride	563417
Sethoxydim	74051802
Silane, (4-aminobutyl)diethoxymethyl-	3037727
Sodium anthraquinone-1-sulfonate	128563
Sodium arsenate	7631892
Sodium arsenite	7784465
Sodium azide (Na(N3))	26628228
Sodium cacodylate	124652
Sodium chromate	7775113
Sodium fluoroacetate	62748
Sodium pentachlorophenate	131522
Sodium selenate	13410010
Sodium selenite	10102188
Sodium tellurite	10102202
Strychnine	57249
Strychnine sulphate	60413
Sulfotep	3689245
Sulfoxide, 3-chloropropyl octyl	3569571
Sulfur tetrafluoride	7783600
Sulfur trioxide	7446119
Sulfuric acid	7664939
Tabun	77816
Tellurium	13494809
Tellurium hexafluoride	7783804
TEPP	107493
Terbufos	13071799
Tetraethyl lead	78002
Tetraethyltin	597648
Tetranitromethane	116143
Thallic oxide	1314325
Thallos carbonate	6533739
Thallos chloride	7791120
Thallos malonate	2757188
Thallos sulfate	7446186

Thallos sulfate	10031591
Thiocarbazide	2231574
Thiocyanic acid, (2-benzothiazolythio methyl...	21564170
Thiofanox	39196184
Thiometon	640153
Thionazin	297972
Thiophenol	108985
Thiosemicarbazide	79196
Thiourea, (2-chlorophenyl)-	5344821
Thiourea, (2-methylphenyl)-	614788
Titanium tetrachloride	7550450
Toluene-2,4-diisocyanate	584849
Toluene-2,6-diisocyanate	91087
Triamiphos	1031476
Triazofos	24017478
Trichloro(chloromethyl)silane	1558254
Trichloro(dichlorophenyl)silane	27137855
1,1,1-Trichloroethane	71556
1,1,2-Trichloroethane	79005
Trichloroacetyl chloride	76028
Trichloroethylsilane	115219
Trichloronate	327980
Trichlorophenylsilane	98135
Trichlorophon	52686
Triethoxysilane	998301
Trimethylchlorosilane	75774
Trimethylpropane phosphite	824113
Trimethyltin chloride	1066451
Trimethyltin chloride	639587
Tris(2-chloroethyl)amine	555771
Valinomycin	2001958
Vanadium pentoxide	1314621
Vinylbornene	3048644
Warfarin	81812
Warfarin sodium	129066
Xylene dichloride	28347139
Zinc phosphide	1314847
Zinc,dichloro[4,4-dimethyl-5-[[[(methylamino)...	58270089
Trans-1,4-Dichlorobutene	110576

*These States and territories operate their own OSHA-approved job safety and health programs (except Connecticut and New York whose plans cover public employees only).