



# EHSS Phosphates Business Unit Program

## Emergency Response

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# EHSS Phosphates Business Unit Program

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### 1 PURPOSE

The Purpose of this program is to establish guidelines and maintenance of first-aid supplies, to establish procedures and designated areas for Medivac services, and to provide guidance on levels of emergency response, training requirements for the designated response level, member selection criteria, and program administration for Emergency Response and Emergency Response Team (ERT) members.

### 2 SCOPE

This program applies to Mosaic Phosphate Business Unit facilities whose employees participate in emergency response.

### 3 APPENDICES

The following appendices are associated with this Program:

Appendix	Appendix Title
A	Definitions
B	Roles and Responsibilities
C	Prospective ERT Member Application
D	Human Resource Approval Form
E	Post Event Critique Form
F	Medivac Landing Zones by Location
G	Type I (Mounted) and Type II (Trauma) First Aid Kit Contents

### 4 GENERAL REQUIREMENTS

#### 4.1 First Aid Daily Inspection and Monthly Checklist

- 4.1.1 Monthly inspections will be required on all first aid kits (Type I, Type II) Monthly inspections will be included in safety equipment inspection programs.
- 4.1.2 First aid kit Type II shall be inventoried & inspected after each use or semi-annually if the seal has not been broken. Must have date & name of inspection person on the outside seal.
- 4.1.3 Each employee, who uses the first aid kit (Type 1 and/or Type II) during the shift, must report first aid treatment to his or her supervisor immediately.
- 4.1.4 If any deficiencies are found during the visual or monthly inspection of the First Aid Kits Type I or Type II, the employee must notify the supervisor.



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- 4.1.5 Inspections may be done by site personnel/contractors designated by the safety/medical department.
  - 4.1.6 If any deficiencies are found during the visual or monthly inspection of equipment or prior to using the equipment, it shall be removed from service and tagged out until repairs are made.
  - 4.1.7 The completed first aid kit checklist must be kept on file by the location for 30 days.
  - 4.1.8 Sites documented inspection program for all first aid and trauma kits must include: all contents, expiration dates (if needed), the date of inspection, who inspected the bags, and the location of the bag/kit
  - 4.1.9 Altering or disabling safety devices is prohibited
- 4.2 ERT Response Levels
- 4.2.1 Mosaic Phosphate Business Unit facilities will be prepared to provide an emergency response at the designated level in accordance with the table below:



Category	Level of Response
Medical Response	Emergency Medical Responder (EMR)
Fire	Incipient
Confined Space Entry	Entry Rescue (no IDLH or high angle rope)
Hazardous Material (Hazmat)	Operations Level / On Scene Incident Commander



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### 4.3 ERT General Rules

- 4.3.1 Participation in the ERT Program as part of an ERT is voluntary. However, the program consists of mandatory requirements that must be met in order to remain a current and active member.
- 4.3.2 ERT members are expected to attend training that may occur on dates that are off shift or outside their normal scheduled hours.  
 **Note:** If applicable, members will be compensated per standard Mosaic Phosphates BU pay policy or applicable Collective Bargaining Agreement (CBA)
- 4.3.3 ERT members are only authorized to respond to an incident when:
  - Incident corresponds with their current level of training
  - Annual medical clearance is current
- 4.3.4 ERT members are required to keep response information confidential and limited only to those that need to know.
- 4.3.5 ERT members are not authorized to provide news agencies with information concerning an event.
- 4.3.6 The “On Scene Incident Commander” will direct any media inquiries to a Public Affairs representative.
- 4.3.7 All ERT response incidents shall be recorded in AON.
- 4.3.8 **Appendix E - Post Event Critique Form** shall be used to document post response critiques.  
 **Note:** All responses should be documented

## 5 MEDIVAC

- 5.1 Landing Zone Selection and Identification:
  - 5.1.1 Landing zones shall be selected by mutual agreement of the S&H and line organizations, with S&H having the primary responsibility for identifying proper location and adequate number of landing zones
  - 5.1.2 A current list of landing zones shall be maintained in Appendix F to this policy.
  - 5.1.3 Locations of the landing zones (GPS coordinates) shall be maintained on the list and communicated with the appropriate Medivac services companies.
- 5.2 Landing Zone Specifications/Preparation:
  - 5.2.1 Size: 100ft X 100ft



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- 5.2.2 Firm surface: concrete, asphalt, or firm ground with grass.
- 5.2.3 If not level, no more than 10 degrees slope.
- 5.2.4 No overhead obstructions such as wires or overhanging tree branches.
- 5.2.5 Free of debris or hazardous materials
- 5.2.6 Sufficient distance from scene so that the scene is not affected by approach and departure of the aircraft.
- 5.2.7 Mark landing zone so that it can be seen clearly from the air.
- 5.2.8 When possible, place vehicle with emergency lights on underneath overhead wire obstructions to mark them.
- 5.2.9 Permanent landing zones shall be clearly identified to ensure equipment or other material is not accidentally stored in the zone.

### 6 ERT MEMBERSHIP REQUIREMENTS

#### 6.1 Physical Requirements

- 6.1.1 New ERT candidates must pass a physical /medical exam as determined by Physician or other Licensed Health Care Professional (PLHCP) per regulatory requirements prior to participating in ERT activities.
- 6.1.2 All ERT members must successfully complete a physical / medical examination annually.
- 6.1.3 ERT members and On Scene Incident Commanders, as designated by site leadership, that are required to wear a Self-Contained Breathing Apparatus (SCBA) respirator must follow the Phosphates Respiratory Protection program.

 **Reference: EHSS-Phos Program – Respiratory Protection**

#### 6.2 Other Requirements

- 6.2.1 New employees, during their probationary period, are not eligible to participate in the ERT program.
- 6.2.2 Employees cannot participate as an ERT member if they are on a Performance Improvement Plan (PIP) or on the final step of the progressive discipline process.

### 7 ERT SELECTION AND APPROVAL

- 7.1 ERT members will be selected per the guidelines and process in **Appendix C – Prospective ERT Member Application.**



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- 7.2 Members will be approved utilizing **Appendix C – Prospective ERT Member Application** by the following roles:
- Direct Supervisor
  - Area / Department Manager
  - Safety
  - Human Resources
  - Physician or other Licensed Health Care Professional (PLHCP)

### 8 ERT MAINTAINING MEMBERSHIP COMPLIANCE

- 8.1 ERT members are required to attend all designated ERT training classes.
- 8.2 ERT members should work with their supervisor / scheduler to schedule training dates.
- 8.3 ERT members are required to participate in site and business unit drills. Performance in those drills will be measured and documented.
- 8.4 With limited resources and finite membership, it is important that all ERT members have the availability to respond to incidents at their location. ERT members who no longer can respond to incidents due to a change in job duty requirements or location will have to step down from the team to allow their site to backfill their position.

### 9 ERT MEMBER NON-COMPLIANCE

- 9.1 Failure to comply with any provision of the Phosphates BU ERT Program may affect ERT participation and result in probation and / or suspension from the team.
- 9.2 **Probation** – Probation will consist of formal warning via written notification that will inform the member of the probation period and action that caused the probation.
- If a member misses two required training events without justification, he/she shall be placed on probation from the ERT
  - During the probation status, the member is expected to attend required training sessions and can actively respond to ERT incidents
  - Probation will last up to three months. If no further infractions of the ERT Program are made, then the member will be removed from probation
  - Any additional performance issues while on probation will result in suspension
- 9.3 **Suspension** – Suspension will consist of formal notification via written letter and removal as an ERT member.
- If a member’s performance or behavior is not appropriate for an ERT member, during a response or during any aspect of the member’s regular job, they will be suspended from the ERT

 **Note:** This is determined on a case by case basis and is at the sole discretion of site leadership

- If the member misses a training event without justification while on probation, the member will be suspended
- If the member is placed on probation twice during a rolling 12-month period
- A suspended member may reapply no sooner than 1 year after the suspension date

## 10 EQUIPMENT AND VEHICLES


- 10.1 Manufacturers Operating & Safety Manual (pertaining to specific model of rescue equipment), shall be maintained on the rescue equipment and available for use or review.
- 10.2 ERT equipment shall be inspected and maintained per regulatory requirements and manufacturing guidelines.
- 10.3 ERT vehicles shall be inspected, maintained, and operated per manufacturing guidelines and the Phosphates Vehicles and Roadway Program.

 **Reference: *EHSS-Phos Program – Vehicles and Roadways***

- 10.4 All ERT supplies shall be inventoried and inspected to ensure they are without defect and not expired.

## 11 PERSONAL PROTECTIVE EQUIPMENT (PPE)

- 11.1 ERT member shall follow all PPE requirements as defined in the Phosphates PPE and Blood Borne Pathogens programs.

 **Reference: *EHSS-Phos Program – Personal Protective Equipment (PPE)* and *EHSS-Phos Program – Bloodborne Pathogens (BBP)***

- 11.2 PPE and General Attire for Designated Training Areas
  - 11.2.1 ERT members shall comply with the follow PPE and General Attire requirements for Designated Training Areas.
  - 11.2.2 There are three designated training areas; each has specific PPE and Non-PPE dresswear requirements that shall be observed during any ERT Training event. Designated Training areas are covered in Table 1 below:




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<b>TABLE 1</b> PPE and Non-PPE dresswear requirements		
<b>Designated Training Areas</b>	<b>PPE Requirement</b>	<b>Dresswear/Footwear Requirement</b>
<b>Company-owned Operational sites and designated Plant and Mine-site work areas (Level 1)</b>	<ul style="list-style-type: none"> <li>• Match the requirements as specified in the Phosphates PPE Program</li> </ul>	<ul style="list-style-type: none"> <li>• Match the requirements as specified in the Phosphates PPE Program</li> </ul>
<b>Non-Company owned offices, work areas, and training facilities (Level 2)</b>	<ul style="list-style-type: none"> <li>• PPE is required for field-based “hands on” trainee-engaged exercises, as required by the training provider, and/or of the training site</li> <li>• Non-PPE for classroom only sessions, and where the training site has no other specific PPE requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Match the training subject, participation, and environmental requirements for the courseware being delivered</li> </ul>
<b>Company owned training facilities (Level 3)</b>	<ul style="list-style-type: none"> <li>• PPE is required for field-based “hands on” trainee-engaged exercises, as required by the training provider, and/or of the training site</li> <li>• Non-PPE for classroom only sessions, and where the training site has no other specific PPE requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Match the training subject, participation, and environmental requirements for the courseware being delivered</li> </ul>



- 11.3 Examples of Non-PPE / Casual clothing that is NOT considered appropriate and is therefore NOT permitted for any of the above designated areas:
- Spaghetti-strap, tank or halter tops, short skirts, or exercise pants
  - Clothing that is made of see-through materials or clothes that expose areas of the body usually covered in the workplace (i.e., Midriff)
  - Clothing that is excessively short, tight fitting, low riding, revealing, or displaying potentially offensive words, terms, logos, symbols, images, or pictures
- 11.4 Examples of Non-PPE / Casual footwear that is NOT considered appropriate and is therefore NOT permitted for any of the above designated areas:
- flip-flops
  - sports sandals
  - slippers

 **Note: IN ALL TRAINING SITUATIONS, LOCATIONS, ENVIRONMENTS, AND FACILITIES specified above:** Event attendees and/or trainees are required to have standard work-required PPE on-hand and available (minimum of foot, hand, eye, and head protection), should that level of PPE be required to participate in the event or training (i.e., in their vehicle.)

## 12 TRAINING

- 12.1 Only properly trained and qualified employees shall be permitted to render first aid. Employees assigned will be required to attend a general first aid class and receive practical instruction from a qualified person prior to rendering first aid as outlined below. Anyone rendering first aid must also follow guidelines as outlined in the Blood Borne Pathogens Procedure.
- 12.2 Equipment Specific Training shall also be required.
- 12.2.1 Before being authorized to use rescue equipment, employee should have:
  - 12.2.2 Been instructed by a qualified person in the intended purpose and function of each piece of rescue equipment.
  - 12.2.3 Read and understand the manufacturer's operating instruction(s) and user's safety rules or been trained by a qualified person on the contents of the manufacturer's operating instruction(s) and user's safety rules.
  - 12.2.4 Understood by reading or by having a qualified person explain all decals, warnings, and instructions displayed on the rescue equipment.
- 12.3 ERT Training



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- 12.3.1 Annual training classes will be made available multiple times in a month. Training locations may include a mosaic site, a centralized training facility or a third-party facility.
- 12.3.2 Initial classes may not be available on a regular basis but are required for new ERT members. Classes will be scheduled once a need is identified.
- 12.3.3 The following table outlines the training required for the Phosphates ERT program:

Audience	Training Elements / Topics	Frequency	Method
New ERT Member	<ul style="list-style-type: none"> <li>• Emergency Medical Responder Initial 40 hr.</li> </ul>	Initial	Instructor Led Training (ILT)
ERT Member	<ul style="list-style-type: none"> <li>• Confined Space Rescue 8 hr.</li> <li>• Incipient Fire Fighting- Fire Extinguishers 4 hr.</li> <li>• First Responder Refresher 16 hr.</li> <li>• Incident Command Awareness 4 hr.</li> <li>• HazMat Operations Level 8 hr.</li> </ul>	Annual	ILT
Minerals Personnel (all)	<ul style="list-style-type: none"> <li>• Basic First Aid</li> </ul>	Initial and Annually during MSHA refresher	Instructor Led Training (ILT)
Concentrates personnel (all)	<ul style="list-style-type: none"> <li>• Basic First Aid</li> </ul>	Initial and Annually during MSHA refresher	Instructor Led Training (ILT)
Electricians and Instrumentation mechanics (Minerals - all; Concentrates - if ERT not available):	<ul style="list-style-type: none"> <li>• CPR with valid card at all times</li> </ul>	Initial and every 2 years	Instructor Led Training
Shift Supervisors (Concentrates)	<ul style="list-style-type: none"> <li>• Incident Command for Supervisors 24 hr.</li> </ul>	Initial	ILT



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Audience	Training Elements / Topics	Frequency	Method
	<ul style="list-style-type: none"><li>Incident Command for Supervisors 8 hr.</li></ul>	Annual	ILT
Shift Supervisors (Minerals)	<ul style="list-style-type: none"><li>Incident Command for Supervisors 8 hr.</li></ul>	Initial	ILT
	<ul style="list-style-type: none"><li>Incident Command for Supervisors 8 hr.</li></ul>	Annual	ILT

### 12.4 Retraining

12.4.1 An employee shall receive additional training (or retraining) if any of the following conditions exist:

- Program requirements change
- Changes in the workplace render previous training obsolete
- Practical application, including drill performance, is deemed inadequate
- Regulation requirement change

### 12.5 Training records

12.5.1 Training records shall be maintained by training department via the Learning Management System (LMS).

12.6 Training records shall be maintained per ***Mosaic Document and Record Control*** policy.

 **Reference: Mosaic Document and Record Control** policy

### 12.7 Drills

12.7.1 ERT Drills shall be planned, scheduled, and conducted in accordance with current MMS requirements.

12.7.1.1 ERT Drills shall be documented and maintained for a rolling 3-Year period. (Note: As a minimum, ERT drill detail shall include the month, the shift, and a brief description of the drill topic and/or exercise.)

12.7.1.2 ERT Drills shall include, at a minimum, one training capability per quarter (i.e., Medical, Fire, Confined Space, other site-specific, high threat potential trained response.)

12.7.1.3 Site-wide drills shall include the use of the Emergency Notification System specifically to test communication with the ERT.



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12.7.2 Annually, and only for those locations that have specified landing zones, a coordination drill between a site EHS representative and the appropriate Medivac services company shall be held to affirm the landing zone(s) coordinates, adequacy, and to provide training for those ERT and/or EHS personnel responsible for communicating with the Medivac company during an emergency.

12.7.2.1 The annual coordination drill shall be documented.

12.7.3 After-Action focused drill critiques shall be conducted after each ERT drill specifically to identify high-potential drill improvement opportunities (i.e., assigned corrective actions.)

12.7.3.1 ERT Drills, After-Action drill critiques, and corrective actions shall be uploaded to Mosaic's data management system.

### 13 CONTRACTORS

13.1 Contractors performing services at Company plant sites shall provide appropriate medical facilities and/or first aid treatment for their employees. Contractors are responsible for referring their employees to a medical clinic, emergency room, or physician in the event of an on-the-job injury or illness.

13.2 Most Mosaic sites have an onsite clinic and Emergency Response Team. Contractors should seek help from these resources before taking employees to an offsite clinic.

13.3 Purchasing is responsible for communicating the guidelines to appropriate contractors and suppliers.


### 14 SELF-ASSESSMENT

14.1 Site self-assessment shall be conducted in accordance with the MMS requirements.

14.2 The following should be included as part of the self-assessment:

- A review of this document for accuracy and applicability
- An evaluation of site compliance through field observations / audits
- A review of the Risk Register for any entries related to the Program
- A review of recent site and / or BU related incidents
- A review of compliance with training requirements as per the Training Matrix

14.3 Document results of self-assessment and corresponding corrective actions.

 **Note:** Recommend any changes to the Program EHS Project Management Office (PMO) via the PMO Change Request form



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### 15 PROGRAM REVIEW

15.1 Phosphates EHS team will review this program every seven (7) years or when deemed necessary by EHS Leadership and update as required to ensure compliance with all applicable OSHA / MSHA requirements.

### 16 RECORD RETENTION

16.1 Refer to the *Mosaic Document and Record Control* policy for record retention requirements.

 **Reference: Mosaic Document and Record Control** policy

### 17 REFERENCES

References (Number and title)
OSHA 1910.120 – Hazardous waste operations and emergency response
OSHA 1910.146 – Permit-required confined spaces
OSHA 1910.151 – Medical services and first aid
OSHA 1910.156 – Fire brigades
EHSS-Phos Program – Bloodborne Pathogens (BBP)
EHSS-Phos Program – Personal Protective Equipment (PPE)
EHSS-Phos Program – Respiratory Protection
EHSS-Phos Program – Vehicles and Roadways
Mosaic Document and Record Control Policy
MSHA 30 CFR 57.15001- First-Aid Materials
MSHA 30 CFR 57.18010- Training
OSHA 29 CFR 1910.151- First-Aid
OSHA 29 CFR 1910.183 - Helicopters
ANSI Z308.1-1998- First-Aid Kits
ANSI Z358.1-1990- Emergency eye wash and showers
Coast Guard 33 CFR 127.1505 Emergency Response & Rescue

### 18 REVISION LOG



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Rev. No.	Rev. Date	Revised By	Reason for Revision
0	08/14/2001	EHS – D. McElveen	Initial release
1	03/26/2003	EHS – B. Roberts	Review
2	11/10/2005	EHS – D. Allen	Logo and company name change
3	12/05/2006	EHS – J. Marshall	Logo / formatting
4	05/14/2007	EHS – D. Allen	Standardize formatting
5	09/15/2011	EHS – D. Allen	Reformat for ISO
6	05/20/2012	EHS – J. Marshall	Updated to include all site
7	04/20/2016	EHS – PMO team	Review
8	02/01/2020	EHS – PMO team	Formatting and updates to align with new process and requirements
9	09/30/2021	EHS – PMO team	Combined with First Aid Medivac and review for out of date
10	9/21/2022	EHS and PMO team	New guidelines provided for Emergency Response Training attire and PPE