

Proposed Orange County Sanitation District Safety and Physical Security

Has OCSD properly prepared to ensure the safety, health, and security of the workforce and adequately planned for emergencies?

Summary Policy Statement

The Sanitation District will ensure the safety and security of employees, contractors and visitors through standard practices, policies, and procedures that support a safe and secure environment, provide an appropriate level of security and safeguard OCSD's property and physical assets.

Background

In California, employers must furnish employees with a place of employment free from recognized hazards that cause death or serious physical harm, that is compliant with all legal requirements and aligns with industry best practices. The safety and wellness of the public and employees is our number one priority. OCSD is committed to identifying all hazards through inspection and providing engineering controls, job specific safety training, and personal protective equipment.

Programs that have proved effective in ensuring the safety and wellness of OCSD's workforce, visitors and contractors include:

- **Safety Assessments and Engineering Controls**
In 2014, OCSD conducted a Facility-Wide Safety Assessment Project (SP-145-1) to identify process equipment design and configuration issues that may impact worker safety, and compliance with regulations. The main purpose of this effort was to enhance worker safety and ensure compliance with safety codes. At the same time, safety improvements allow for reliable and efficient operation, so that our facilities can meet regulatory and process demands, while providing cost effective operation. All the Project SP-145-1 recommendations to be implemented by OCSD have either been addressed by Maintenance or have been incorporated into the Safety Improvement Project (J-126).
- **Emergency Management**
The Sanitation District must be prepared to control risks to the organization, and routinely recognize, evaluate, and prepare for emergencies. An emergency can include a major explosion, fire, verified bomb threat, civil disorder, active shooter situation, or uncontrolled materials release which interrupts OCSD's ability to provide safe and environmentally responsible wastewater treatment. The Sanitation District's protocol to control and respond to emergencies is contained within the Integrated Emergency Response Plan (IERP).

The IERP identifies and assesses hazards regarding emergency events which OCSD may be confronted with and contains policies, plans, and procedures for preparing and responding to emergencies. The Sanitation District's emergency

response organization, called the Incident Command System (ICS), is activated when an emergency condition cannot be effectively responded to under routine operations. Once the immediate emergency has been controlled, then OCSD must resume normal operations. In the event of a prolonged emergency state, the return to normal operations is guided by a Continuity of Operations Plan (COOP). In May 2018, a COOP was completed with all divisions contributing to its development. Business continuity planning is an ongoing process for OCSD with plans being updated as information changes.

The Sanitation District collaborates with local agencies to ensure available resources are identified and engaged in the event of an emergency. OCSD has partnered with local agencies in the areas of emergency response for evacuation drills and resource sharing.

- 1) The Sanitation District participated in the 2019 Orange Crush Regional Emergency Preparedness and Training Exercise in January 2019. This county-wide exercise used a scenario of a magnitude 7.8 earthquake strike along the San Andreas Fault. A full Emergency Operations Center activation occurred for this functional exercise and gave the Sanitation District the opportunity to test the Integrated Emergency Response Plan.
- 2) The Orange County Sheriff's Department and the Orange County Health Care Agency established a Joint Information Center at Plant No. 2 on May 13-14, 2019 to host an enforcement event in Talbert Park. In addition, the operation was overseen by three federal judges who were present to ensure the rights of all citizens were not violated by law enforcement or The Health Care Agency. Officials utilized Plant No. 2 contractor gates for points of entry.
- 3) The Sanitation District is a member and funding agency of the Water Emergency Response of Orange County (WEROC), which is an organization that is administered by the Municipal Water District of Orange County (MWDOC). It supports and manages countywide emergency preparedness, planning, response and recovery efforts among Orange County water and wastewater utilities.

Security

The Department of Homeland Security has designated 16 critical infrastructure sectors, which includes water and wastewater systems. Wastewater systems are vulnerable to a variety of attacks, including acts of terrorism, contamination with deadly agents; physical attacks, such as the release of toxic gaseous chemicals, and cyberattacks. In addition, the Department of Homeland Security indicates that the average time it takes for a critical incident to take place is up to 12 minutes while the average police response time can be up to 11 minutes and that time could increase should there be a natural disaster.

Additional security concerns include physical violence, vandalism, theft, and trespassers. With approximately 100 acres at each site, 600 employees, contractors, and members of the public on site for tours and meetings, it is essential to maintain a security force that can respond to security threats promptly.

The Sanitation District contracts with a security firm that supplies four armed and five unarmed guards to provide round the clock security monitoring of over 80 cameras, monitoring gate access, and patrolling the perimeter at both plants.

Current Situation

The Risk Management division has been given the responsibility and an adequate budget to assess and control the safety, security, and health risks that employees, contractors, and guests may be exposed to from OCSD operations. Assessment and control of risks is achieved collaboratively between Risk Management staff and internal stakeholders. Risk Management, managers, and staff collaborate to develop written procedures (e.g., policies) that are used for controlling and eliminating hazards at OCSD; thus, ensuring compliance with occupational health and safety standards and laws.

Safety

As the health and safety of employees, contractors and visitors is the number one priority, the Sanitation District strives to achieve safety excellence. This is exemplified by our pursuit of the California Voluntary Protection Program (Cal/VPP). The Cal/VPP is a program created by Cal/OSHA to recognize organizations who have implemented safety and health programs that effectively prevent and control occupational hazards. A Cal/VPP workplace is expected to continually improve its safety program; which means a safe workplace for all. A reduction in injuries and illness has been documented at sites that have committed to the VPP approach. Cal/VPP is recognized as a higher level of protection for the workplace, for this reason, OCSD is pursuing this designation.

In preparation for application to the Cal/VPP program, the Sanitation District conducted a Cal/VPP readiness assessment in January 2019 and developed an implementation strategy. The assessment included interviews with various OCSD subject matter experts and discussions with employees during facility tours. OCSD procedures and records were reviewed, and limited visual inspection of work locations and facilities was conducted. The assessment considered basic Cal/OSHA regulatory compliance and additional best management practices that are expected to be implemented in VPP certified workplaces. Based on the results of the VPP assessment, OCSD is working toward applying for VPP before the end of calendar year 2019. The timing coincides with the implementation of most of the Safety Improvement Project (J-126), which are critical for success in our VPP pursuit.

This Safety Improvement Project (J-126) is progressing on-schedule. Of the eleven J-126 projects, two have been completed, seven are in the construction phase, and two are pending contractor award. It is important to note that interim measures have been

taken to ensure worker safety at the locations identified for safety improvements. Workers are not exposed to hazards while projects are completed.

Eliminating hazards through engineering projects is critical, along with a positive safety culture. In order to assess the safety culture at OCSD, a survey was conducted from February to April 2019. The results of this survey indicated employees believe the safety culture is improving, desired an increase in communication on safety issues, and wanted less online and more hands-on customized safety training.

Emergency Management

The Sanitation District partners with local agencies to ensure available resources are identified and engaged in the event of an emergency. Collaborations currently scheduled include:

- 1) In conjunction with WEROC, OCSD participated in the development of the Orange County Water and Wastewater Hazard Mitigation Plan (Plan) which will be submitted for approval to the State. The Plan provides a framework for participating water and wastewater utilities to plan for natural and man-made hazards in Orange County. The Sanitation District is an active participant in the Plan, and developed a hazard mitigation plan, which is Annex C of the Plan. The resources and information within the Plan will allow OCSD, and participating jurisdictions to identify and prioritize future mitigation projects, meet the requirements of federal assistance programs and grant applications, and encourage coordination and collaboration in meeting mitigation goals.
- 2) On July 27, 2019, the Sanitation District partnered with the Fountain Valley Police Department Explorers during OCSD's Open House event. The Police Explorers assisted Human Resources and Risk Management with crowd and traffic control. Their assistance was beneficial in the management of public during this important event.

Security

The designation of wastewater systems as critical infrastructure by the Department of Homeland Security requires OCSD to be diligent in protecting people and property from security breaches. OCSD seeks to continually improve the security program. On June 7, 2019, OCSD issued a Request for Proposal (RFP) for Security Services, which included a potential expansion of security services for OCSD's new Headquarters Complex. As part of the RFP evaluation, OCSD will review procedural and technical enhancements/innovations that may improve the existing program.

In addition, OCSD has established a Security Committee, which includes stakeholders from a cross-section of the organization, to collect input and assess physical and cyber security concerns and suggestions. Responsibilities of the committee include, but are not limited to, development of a physical and cyber security plan, reviewing orders and policies, reviewing incident reports, and planning drills. The first meeting of the committee was held on June 6, 2019.

Future Policy Statement

Risk Management has and will continue to implement strategic initiatives that will ensure the safety, health, and security of its workforce, and proactively plan for emergencies to ensure continuity of operations. Staff is dedicated to proactively monitoring the changing work environment and requirements to implement programs now that address future vulnerabilities. Assessments of changes in business needs, plant processes and legal requirements are necessary to ensure a safe and secure work environment. The results of improvement will be measured using leading metric indicators and reported to the workforce to foster employee engagement.

Initiatives to Support Progress Toward the Policy Goal

Safety

- **Initiative:** Complete outstanding safety projects, improvements, and corrective actions to apply and obtain Cal/OSHA Voluntary Protection Program (VPP) status; and continue to foster a culture where employees are accountable for their safety as well as the safety of others.

Emergency Management

- **Initiative:** Support facility and countywide emergency preparedness, response, and recovery efforts by partnering with entities, such as, the Water Emergency Response Organization of Orange County (WEROC), Orange County Sheriff Department, and local fire departments to plan and continue to conduct disaster preparedness training and exercises.

Security

- **Initiative:** Continually identify and assess vulnerabilities and implement solutions through the Security Committee and third-party assessments. Prevent/mitigate security breaches using physical security systems such as video monitoring, access control, and armed security patrols.