

STRATHMERE LODGE

Emergency Management Program

CHEMICAL SPILL / HAZARDOUS MATERIALS RESPONSE PLAN

CODE BROWN

Original Date: May 16, 2022

Reviewed/Revised Date: August 26, 2026

TABLE OF CONTENTS

- 1. Purpose**
- 2. Scope**
- 3. Chemical/Hazardous Material Risks**
- 4. Minor Spill Versus Emergency Chemical Spill**
- 5. Plan Activation – Code Brown**
- 6. Immediate Response**
- 7. Internal Chemical Spill**
- 8. Diesel Fuel Spill / Generator**
- 9. Laundry Chemical Spill**
- 10. External / Community Chemical Release**
- 11. Exposure to a Chemical**
- 12. Spill Containment and Cleanup**
- 13. Resident Relocation / Evacuation / Shelter-in-Place**
- 14. Roles and Responsibilities**
- 15. Safety Data Sheets (SDSs) and Spill Response Equipment**
- 16. Communications**
- 17. Recovery and Reoccupation**
- 18. Documentation and Reporting**
- 19. Training, Testing and Review**

Appendix A – Code Brown Quick Response Guide

Appendix B – Chemical Spill Decision Matrix

1. PURPOSE

The purpose of this Plan is to establish a safe and coordinated response to an actual or suspected chemical spill or hazardous material release affecting Strathmere Lodge.

The Plan is intended to:

- protect residents, staff, visitors and others from chemical exposure;
- ensure staff do not attempt to manage spills beyond their training or available protective equipment;
- rapidly isolate hazardous areas;
- obtain emergency assistance when required;
- provide for safe resident relocation, shelter-in-place or evacuation;
- prevent the spread of contamination;
- protect the environment and building systems; and
- support safe recovery and restoration of normal operations.

Ontario Regulation 246/22 requires long-term care home emergency plans to address chemical spills and to assess hazards arising both within the Home and in the surrounding vicinity or community.

2. SCOPE

This Plan applies to significant or potentially hazardous releases involving substances such as:

- cleaning and disinfecting chemicals;
- laundry chemicals;
- Dietary chemicals;
- maintenance chemicals;
- diesel fuel associated with the emergency generator;
- oils, solvents or other maintenance products;
- unknown chemicals;
- hazardous substances released elsewhere in the community that may affect the Home.

This Plan does **not** require activation for every small routine spill.

Minor spills that can safely be managed by trained staff under the applicable Safety Data Sheet (SDS) and routine departmental spill procedure may be managed without activating Code Brown.

3. CHEMICAL / HAZARDOUS MATERIAL RISKS

Potential internal sources at Strathmere Lodge include:

Housekeeping

Cleaning agents, disinfectants and other Environmental Services products.

Laundry

Concentrated laundry chemicals, larger chemical containers and automatic dispensing lines/equipment.

Dietary

Dishwashing, cleaning and sanitizing products.

Maintenance

Maintenance products, oils, solvents and other hazardous products.

Emergency Generator

Diesel fuel associated with the Home's emergency generator and its fuel system.

External Sources

Transportation, industrial, commercial or other community incidents involving hazardous substances.

Portable oxygen concentrators are **not treated as chemical spill sources under this Plan**. Any electrical/fire-related emergency involving this equipment shall be managed under the appropriate clinical, fire or other applicable procedure.

4. MINOR SPILL VERSUS EMERGENCY CHEMICAL SPILL

This distinction is fundamental.

4.1 Minor / Manageable Spill

A spill may be managed in-house under routine procedures where **all** of the following apply:

- substance is known;
- quantity is small and manageable;
- SDS has been reviewed as necessary;
- staff are trained to manage the substance;
- appropriate Personal Protective Equipment (PPE) is available;
- appropriate spill control materials are available;
- no significant fumes/vapours are present;
- no fire/explosion risk exists;
- no person has experienced significant exposure;
- spill is contained;
- spill has not entered drains or the environment; and
- circumstances remain within the Home's safe capacity to manage.

4.2 Emergency Chemical Spill – Code Brown

Activate **CODE BROWN** where circumstances include:

- unknown substance;
- significant or uncontrolled quantity;
- strong or hazardous fumes/vapours;
- fire or explosion potential;
- significant diesel/fuel release;
- resident/staff exposure or symptoms;
- uncontrolled chemical reaction;
- spill spreading beyond the immediate area;
- spill entering drains or the external environment;
- inability to identify appropriate PPE or cleanup procedure;
- staff cannot safely contain the spill;
- any other imminent threat requiring emergency action.

This distinction aligns with the Ontario Regulation 246/22 definition of an emergency as an urgent situation presenting an imminent threat requiring immediate action.

5. PLAN ACTIVATION – CODE BROWN

Any staff member discovering a suspected emergency chemical spill shall:

1. STOP

Do not touch, smell closely, walk through or attempt to clean an unknown or potentially hazardous substance.

2. LEAVE

Move away from the immediate area.

3. WARN

Warn others and prevent entry.

4. NOTIFY

Immediately notify the Charge Nurse.

5. ACTIVATE CODE BROWN

Announce:

“CODE BROWN – [SPECIFIC LOCATION].”

where an emergency chemical response is required.

6. CALL 911

Call immediately where the spill presents an immediate threat to persons or property.

Administrative authorization is not required to call 911.

6. IMMEDIATE RESPONSE

UNKNOWN CHEMICAL / STRONG FUMES / PERSON BECOMES ILL

DO NOT ATTEMPT CLEANUP.

Leave → Warn Others → Isolate Area → Notify Charge Nurse → Call 911 as appropriate

Do not:

- deliberately smell or identify a chemical by odour;
- touch the substance;
- walk through the spill;
- attempt cleanup without appropriate training/PPE;
- mix chemicals;
- pour chemicals down drains;
- create ignition sources near a flammable substance.

Where safe, close doors to the affected area **without entering or re-entering the hazard area**.

7. INTERNAL CHEMICAL SPILL

The Charge Nurse shall assume initial Incident Command after hours until relieved by the Administrator/designate.

Environmental Services/Maintenance shall provide technical assistance within staff training and competence.

The Incident Commander shall determine:

- substance involved, if safely known;
- location;
- approximate quantity;
- whether residents/persons were exposed;
- fumes/vapours;
- fire/explosion potential;
- potential spread;
- whether drains/environment are threatened;
- appropriate protective action.

Obtain the applicable **Safety Data Sheet (SDS)** where the substance is known (SDS binders are in The Lodge basement, near the Occupational Health and Safety board).

Ontario's Workplace Hazardous Materials Information System (WHMIS) framework uses labels and SDSs to provide workers and emergency responders with information regarding hazardous products.

8. DIESEL FUEL SPILL / GENERATOR

A diesel spill associated with the emergency generator or fuel supply requires particular caution because of:

- combustible material;
- potential environmental contamination;
- slip hazards;
- vapours;
- possible migration to drains/soil;
- potential interruption of emergency power capability.

Where a diesel spill is discovered:

- keep persons away;
- eliminate ignition sources **where this can be done safely without entering the hazard area;**
- notify Charge Nurse and Environmental Services immediately;
- determine whether 911/Fire Services is required;
- prevent the spill from spreading **only where trained staff can safely do so using appropriate equipment;**
- protect drains where safe and appropriate;
- contact qualified fuel/environmental response contractors as required;
- assess whether emergency generator operation has been compromised.

IMPORTANT

Staff shall not attempt to repair leaking generator fuel systems or undertake a significant diesel cleanup.

Where emergency power capability is affected, activate the **Loss of Essential Services – Electrical Power Plan**.

Environmental reporting requirements shall be assessed.

9. LAUNDRY CHEMICAL SPILL

Because Laundry uses containers and automatic chemical dispensing equipment, a line, pump, container or connection failure could result in a greater volume or concentrated chemical release.

If a significant Laundry chemical spill occurs:

- leave/isolate the affected area;
- prevent unauthorized entry;

- notify Charge Nurse and Environmental Services (Manager, Housekeeping, Maintenance);
- identify the product from a safe location where possible;
- obtain the SDS;
- do not touch concentrated product without required PPE;
- do not mix spilled products;
- do not add another chemical in an attempt to neutralize the spill unless specifically directed by the SDS and undertaken by appropriately trained personnel;
- contact the chemical supplier/911 emergency responder where required.

Where fumes are significant or the product is unknown:

Evacuate the immediate area and call 911.

10. EXTERNAL / COMMUNITY CHEMICAL RELEASE

Strathmere Lodge may be affected by a hazardous material release originating outside the Home.

Examples include:

- transportation accident;
- industrial/commercial release;
- fuel tanker incident;
- fire producing hazardous smoke;
- other community hazardous material incident.

Notification may come from:

- Fire Services;
- Police;
- Municipality;
- emergency alert;
- other emergency authority.

DO NOT GO OUTSIDE TO INVESTIGATE.

Depending on emergency authority direction, protective measures may include:

SHELTER-IN-PLACE

- bring residents/persons indoors;

- close exterior windows and doors;
- restrict entry/exit;
- relocate residents away from the affected side of the building;
- modify HVAC/outdoor air intake **only under Environmental Services direction and/or emergency authority advice**;
- account for residents;
- monitor official instructions.

EVACUATION

Where authorities direct evacuation, activate the **Evacuation Emergency Response Plan**.

Do not evacuate residents toward or through the chemical hazard.

11. EXPOSURE TO A CHEMICAL

Where a person has been exposed:

- remove the person from continuing exposure **where safe**;
- summon registered nursing assistance;
- call 911 where clinically indicated;
- obtain the SDS;
- follow SDS first aid instructions;
- remove contaminated clothing where indicated and safe;
- use eyewash/emergency flushing facilities where applicable and directed;
- avoid contaminating other persons or areas.

Registered staff shall assess exposed residents.

Appropriate medical/emergency assistance shall be obtained without delay.

12. SPILL CONTAINMENT AND CLEANUP

Only trained staff (Housekeeping and Maintenance) shall clean a chemical spill.

Before cleanup, confirm:

- substance is known;

- SDS has been consulted;
- spill is within staff capability;
- correct PPE is available;
- correct spill kit/material is available (a spill kit is maintained in The Lodge basement, in the Chute Room near elevator car 1);
- there is no significant inhalation/fire/explosion risk.

DO NOT

- mix incompatible chemicals;
- use inappropriate absorbents;
- sweep hazardous powders unless the SDS/procedure permits;
- wash chemicals into drains;
- place incompatible chemical wastes together.

Contaminated cleanup material shall be collected, labelled, stored and disposed of appropriately.

13. RESIDENT RELOCATION / EVACUATION / SHELTER-IN-PLACE

The response depends upon the location and nature of the hazard.

INTERNAL CHEMICAL RELEASE

Isolate room/area → relocate within Room Home Area → relocate elsewhere in Home → partial evacuation → full evacuation

EXTERNAL CHEMICAL RELEASE

Shelter-in-place may be safer than evacuation.

Emergency authority direction (e.g., Strathroy-Caradoc Fire Services) shall inform the decision.

Resident accountability shall be maintained throughout relocation or evacuation.

Activate the Evacuation Plan where required.

14. ROLES AND RESPONSIBILITIES

Charge Nurse / Incident Commander

- Activate Code Brown.
- Ensure immediate resident protection.
- Ensure 911 notification where required.
- Coordinate isolation/relocation.
- Obtain SDS information where possible.
- Notify leadership.
- Coordinate with emergency responders.

Environmental Services Manager / Maintenance

- Provide technical/building information.
- Assist with safe product identification.
- Access SDS information.
- Coordinate spill control resources.
- Liaise with chemical/fuel suppliers and contractors.
- Assess HVAC implications.
- Coordinate remediation and recovery.

Director of Resident Care (DRC)

- Coordinate resident care implications.
- Ensure exposed residents are assessed.
- maintain continuity of clinical care;
- support relocation/evacuation.

Registered Staff

- Assess exposed residents.
- provide first aid/emergency clinical care within scope;
- obtain medical assistance as required;
- document resident effects.

PSWs

- Move residents away from the hazard as directed.
- provide reassurance and supervision;
- report symptoms immediately;
- do not participate in chemical cleanup unless trained and specifically assigned.

Dietary / Housekeeping / Laundry Staff

- Know the hazards of products used in their department.
- follow WHMIS/SDS requirements;
- report spills immediately;
- manage minor spills only within training and established procedures.

All Staff

Do not enter an isolated chemical spill area unless authorized, trained and appropriately protected.

15. SAFETY DATA SHEETS AND SPILL RESPONSE EQUIPMENT

15.1 Safety Data Sheets (SDSs)

Strathmere Lodge maintains SDS binders:

Basement – near the Health & Safety bulletin board

Staff shall know how to access SDS information.

15.2 Current Spill Kit

Current spill kit location:

Basement – Chute Room near Elevator Car #1

The spill kit shall remain:

- clearly identified;
- readily accessible;
- appropriately stocked;
- inspected periodically.

Spill Kit Review

The Environmental Services Manager shall review the Home's chemical inventory, SDSs and potential spill quantities to determine whether:

- the current general spill kit is appropriate;
- additional spill kits are required;

- a dedicated oil/fuel spill kit is appropriate near the generator;
 - Laundry requires a spill kit appropriate to its concentrated chemicals;
 - additional PPE/absorbents/containment materials are required.
-

16. COMMUNICATIONS

The Incident Commander shall ensure appropriate communication with:

- residents;
- Substitute Decision Makers (SDMs)/families;
- staff;
- volunteers/students;
- Residents' Council;
- Family Council;
- emergency responders;
- external authorities/agencies as required.

Long-Term Care Home legislation (O. Reg. 246/22) requires frequent and ongoing communication at the beginning of an emergency, following significant status changes and when the emergency is over.

Communication shall be factual and shall not speculate about an unidentified substance.

17. RECOVERY AND REOCCUPATION

An affected area shall not be returned to normal use merely because the visible chemical has been removed.

Consider:

- air quality;
- residual contamination;
- ventilation;
- surfaces/equipment;
- contaminated materials;
- environmental impacts;
- required professional remediation.

Re-entry shall occur only when the area has been determined safe by the appropriate responsible authority/person.

Following an emergency:

- restore normal operations;
- replenish spill supplies/PPE;
- assess exposed persons;
- communicate the all-clear;
- debrief affected residents/SDMs, staff, volunteers and students as applicable;
- provide support to persons experiencing distress;
- identify corrective actions.

18. DOCUMENTATION AND REPORTING

Document:

- date/time;
- location;
- substance where known;
- estimated quantity;
- persons exposed;
- Code Brown activation;
- 911/Fire Services involvement;
- resident relocation/evacuation;
- SDS consulted;
- containment/cleanup;
- contractor/agency involvement;
- communications;
- recovery/re-entry.

Resident-specific effects shall be documented in the health record.

Ministry of Long-Term Care Reporting

Importantly, if the chemical spill rises to the level of an **“emergency” under provincial long-term care home legislation** (O. Reg. 246/22 s. 115), this requires The Ministry to be **immediately informed**.

The Administrator/DRC shall also determine whether reporting/notification is required to environmental, occupational health and safety, municipal, fire, insurance or other authorities.

19. TRAINING, TESTING AND REVIEW

Staff, volunteers and students shall receive training on this Plan appropriate to their responsibilities:

- before performing their responsibilities; and
- at least annually thereafter.

The Chemical Spill Plan shall be **tested at least once every three years**, including applicable arrangements with entities involved in the response.

A very useful Strathmere Lodge tabletop scenario might be:

At 7:30 p.m., a concentrated Laundry chemical line fails in the basement. A strong chemical odour is present, one employee reports burning eyes and coughing, and the substance is spreading toward the corridor.

This tests:

recognition → don't clean it up → Code Brown → isolation → SDS → exposed employee → 911 → resident protection → ventilation considerations → Incident Command → recovery.

APPENDIX A – CODE BROWN QUICK RESPONSE GUIDE

CHEMICAL SPILL / UNKNOWN SUBSTANCE

1. STOP

Do NOT touch or attempt cleanup.

2. LEAVE

Move away from the spill/fumes.

3. WARN & ISOLATE

Keep residents, staff and visitors out.

4. NOTIFY

Charge Nurse → CODE BROWN

5. CALL 911 IF

Unknown substance • Strong fumes • Person symptomatic/exposed • Significant/uncontrolled spill • Fire/explosion risk • Environmental release

6. IDENTIFY — ONLY FROM A SAFE LOCATION

Product label → SDS

SDS Binder:

Basement – near Health & Safety bulletin board

7. PROTECT RESIDENTS

Relocate / Evacuate / Shelter-in-place as appropriate

8. CLEANUP

Only if:

Known + Small + SDS reviewed + Trained + Correct PPE + Correct spill equipment + Safe

9. CURRENT SPILL KIT

Basement – Chute Room near Elevator Car #1

10. RECOVER

Remediate → Assess → Re-enter when safe → Restock → Document → Debrief

APPENDIX B – CHEMICAL SPILL DECISION MATRIX

Use the situation below to identify the safest immediate response.	
Situation	Immediate Response
Small spill involving a known product; trained staff and appropriate PPE are available	Follow the routine spill procedure and the applicable SDS.
Unknown chemical	Isolate the area, activate Code Brown, and call 911 if required.
Strong fumes or vapours	Leave and isolate the area, activate Code Brown, and call 911.
Resident or staff member has symptoms of exposure	If safe, remove the person from exposure. Initiate a clinical response and call 911 as indicated.
Large laundry chemical spill	Isolate the area, activate Code Brown, consult the SDS, and contact emergency responders or the supplier as required.
Significant diesel spill	Isolate the area, control ignition and environmental risks where safe, and obtain emergency or qualified contractor assistance.
Spill entering a drain or the environment	Stop the spread only if it is safe to do so, then escalate and complete required reporting.
External chemical release	Shelter in place or evacuate as directed by emergency authorities.
Fire or explosion risk	Evacuate the hazard area and call 911.
Uncertain whether the spill is safe to clean	Do not attempt cleanup. Isolate the area and escalate the response.