OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR Occupational Safety and Health Administration

DIRECTIVE NUMBER: HSO 01-00-001	**EFFECTIVE DATE:** December 18, 2003
SUBJECT: National Emergency Management Plan (NEMP)	

ABSTRACT

Purpose: The National Emergency Management Plan (NEMP) clarifies procedures and policy for OSHA's National Office and Regional offices during responses to nationally significant incidents. The NEMP establishes OSHA's Emergency Preparedness Executive Steering Committee, and requires that each Region create a Regional Emergency Management Plan (REMP) and proactively coordinate with State plan States and Consultation Projects. In addition, the NEMP outlines procedures to ensure that trained and equipped personnel, and logistical and operational assistance are in place to support OSHA's role as the primary Federal agency for the coordination of technical assistance and consultation for emergency response and recovery worker health and safety.

Scope: This instruction applies OSHA-wide.

References:

1. CPL 02-00-094 [CPL 2.94] – OSHA Response to Significant Events of Potentially Catastrophic Consequences (July 1991)
2. Homeland Security Presidential Directive/HSPD – 5 "Management of Domestic Incidents" (February 2003)
3. Robert T. Stafford Disaster Relief and Emergency Assistance Act (the "Stafford Act") (as amended October 2000)
4. Internal memo from John Henshaw to OSHA personnel regarding OSHA Planning and Training Activities dated March 3, 2003

Cancellations: None

State Plan Impact: State adoption is not required. (See Section VI)

Action Offices: National, Regional, and Area Offices

Originating Office: Directorate of Science, Technology, and Medicine

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Authority Statement: By and Under the Authority of

John L. Henshaw
Assistant Secretary

Executive Summary Statement:

This instruction clarifies National Office and Regional offices roles and responsibilities during responses to nationally significant incidents, such as those that result in a Presidential Emergency Declaration, the activation of the Federal Response Plan, or a request for assistance from the Department of Homeland Security. This instruction includes the primary roles and functions that Federal OSHA National and Regional Offices will assume while planning for and responding to a nationally significant incident. The instruction requires that each Region develop a Regional Emergency Management Plan (REMP) and outlines the REMP in Appendix D. The instruction also establishes an Emergency Preparedness Executive Steering Committee and provides for the creation of four Specialized Response Teams to enhance OSHA's response capabilities for incidents involving Weapons of Mass Destruction (WMD). The committee and teams are discussed in Appendix K and J, respectively.

Significant Changes Statement:

This instruction does not significantly change existing policy. It clarifies and is consistent with related instructions in Section G of CPL 02-00-094 "OSHA Response to Significant Events of Potentially Catastrophic Consequences."

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I. Purpose

This instruction, OSHA's National Emergency Management Plan (NEMP), clarifies procedures and policy for OSHA's National Office and Regional offices during responses to nationally significant incidents. The NEMP identifies and ensures designation of key agency roles and responsibilities. In addition, the NEMP outlines procedures to ensure that trained and equipped personnel, and logistical and operational assistance are in place to support OSHA's role as the primary Federal agency for the coordination of technical assistance and consultation for emergency response and recovery worker health and safety.

The NEMP establishes OSHA's Emergency Preparedness Executive Steering Committee and prescribes how the National Office will support Regional participation during the response to and recovery from a nationally significant incident. It also requires that each Region create a Regional Emergency Management Plan (REMP) and proactively coordinate with State plan States and Consultation Projects to ensure that roles and responsibilities for OSHA's Federal, State, and local assets in the Region are coordinated and complementary.

II. Background

Based on the knowledge, experience, and success gained by OSHA's response to the 9/11 World Trade Center (WTC) terrorist attacks, Region II developed a REMP. The REMP was created in response to the observed need for a cohesive, modular, and scalable emergency response protocol that prepares a Region for a large-scale, sustainable response and creates the framework for an internal incident command structure that correlates with the Incident Command System (ICS) and is suitable for use at lesser responses.

OSHA's role at the WTC and anthrax incidents was one of technical assistance, risk management, and consultation. OSHA's primary responsibility at these sites was to provide safety and health leadership in: safety monitoring, health monitoring, respirator distribution, respirator fit-checking and fit-testing, job hazard analysis, personal protective equipment distribution, and worker health and safety risk management. OSHA worked with Federal, State, and local officials as part of the Unified Command Structure, and also worked in partnership with the private sector to create a site health and safety plan (HASP) that was fully adopted and implemented. OSHA provided 24-hour, 7-day/week coverage throughout the response to the WTC using local and national OSHA resources, including volunteer personnel from State plan and Consultation Project offices. A large part of the success at WTC can be attributed to the constant site monitoring and risk management efforts, and the robust collaboration among OSHA, other site response organizations, site employers, and site personnel.

For OSHA to effectively manage and respond to large-scale incidents, particularly those incidents that involve more than one Region and can quickly overwhelm the resources of a single Region, it is vitally important for Federal OSHA, State plans, and Consultation Projects to be fully prepared.

Federal OSHA's role to provide support and assistance during significant incidents is addressed in CPL Directive 02-00-094 – OSHA Response to Significant Events of Potentially Catastrophic Consequence (July 1991). Procedures identified in the NEMP further clarify those specified in CPL Directive 02-00-094, particularly OSHA's assistance role.

When the NEMP is activated, any decision to discontinue consultation and assistance in favor of enforcement, including at what point during an incident this transition should occur, if at all, will be made by the Regional Administrator in consultation with the Assistant Secretary, Deputy Assistant Secretary, or designee. When the NEMP is not activated, Regional personnel will respond in accordance with CPL Directive 02-00-094 and their REMP.

III. Scope

The policies and procedures identified in this plan cover OSHA's support, assistance, and resources available during nationally significant incidents that result in an emergency declaration under section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121-5206 (the "Stafford Act") and the activation of the Federal Response Plan (FRP), or a request from the Department of Homeland Security (DHS) during national emergencies. Emergency declarations under the Stafford Act may be issued for a variety of natural and manmade disasters. The NEMP ensures that OSHA adopts a consistent approach and provides technical support and assistance suited to the nationally significant incident, whether it originates from a natural or manmade disaster.

The primary operational and functional template for the Regional Offices to effect the NEMP policy and assure intra-agency consistency is the REMP. The REMP describes the procedures that the Region will follow when it is necessary to respond to a covered incident or other large-scale emergencies. It also identifies how the Regional effort will be integrated with that of the other responding organizations through the ICS. The REMP is designed for large-scale, catastrophic incidents, but its concepts can be implemented at the Regional or Area Office level in response to natural disasters or smaller scale incidents without activation of the NEMP. The NEMP and/or the REMP may be activated fully or partially, depending on the circumstances of the incident.

If an incident should occur in a State plan State, the State will likely have primary authority combined with varying levels of Federal OSHA assistance. State plans will also have jurisdiction for State and local government employees in their States, including State and local emergency responders, workers over which Federal OSHA has no direct authority. The NEMP and REMP establish a framework for Federal OSHA and our State plan and Consultation Project partners to plan for coordinated response and to share technical resources. All REMPs will include the specific agreements reached with each State plan for response to a covered incident occurring within that State.

OSHA will respond during the emergency phase of a covered incident and integrate into the site Incident Command/Unified Command Structure in a cooperative role. OSHA will provide technical assistance and consultation to coordinate the protection of response and recovery worker safety and health. This policy is consistent with and supports OSHA's role within the FRP.

The NEMP includes a model outline for the REMP in Appendix D. The model outline includes roles and staffing functions, essential early response actions, activation, logistics, and coordination, but does not provide specific text; text will be developed by each Region. To ensure interoperability within OSHA, each Region will adopt the REMP staffing nomenclature and structure outlined in Appendix D. To allow for inherent differences among Regions, each Region shall have the flexibility to develop a REMP implementation plan that meets the Region's own unique circumstances.

IV. Action Information

A. Responsible Offices

Directorate of Science, Technology, and Medicine (DSTM)

B. Action Offices

OSHA National, Regional, and Area Offices

C. Information Offices

State Designees and Consultation Project Managers

V. Mission

OSHA's National Office is committed to providing resources (personnel and equipment) to support and assist Regional, Area, State plan, and Consultation Project offices, and other Federal organizations to fulfill OSHA's role during a nationally significant incident. Upon receiving a Regional Administrator's request, the National Office will be able to provide support, technical expertise, equipment, and other resources as follows:

- The National Office can provide technical expertise for site worker health and safety using predesignated, Specialized Response Teams, including the Health Response Team (HRT).
- The National Office can provide internal support to Regional/Area/State plan/Consultation Project offices for scheduling and staffing requirements, public information and communication, transportation and lodging, and emergency procurement.
- The National Office can make available requested equipment and laboratory resources to augment those already committed at the site by Regional Offices and other Federal organizations.
- The National Office can ensure that requested resources (both personnel and equipment) arrive at the incident within 24 hours of a granted request.
- The National Office can provide national-level, inter-agency coordination to support the Regional response.

VI. Federal Program Change

This instruction describes a Federal Program Change for which State plan adoption is not required. However, State plans must coordinate with their Regional Administrator to assure that appropriate procedures are in place, that respective responsibilities are delineated for responding to incidents in State plan States, and that these are specifically reflected in the REMP. States may wish to develop their own internal response plan and implementation procedures, and should share these documents with their Regional Administrator. See Section IX.C and Appendix D (Outline, Section V) of this instruction.

VII. Authorities

See Appendix A.

VIII. References and Key Definitions

Appendix B provides references and definitions.

IX. Roles and Functions

This section of the NEMP outlines the roles and functions that Federal OSHA National and Regional Offices will assume while planning for and responding to a covered incident. Specific Regional/Area response procedures are identified by each Region in its REMP.

A. Assistant Secretary of Labor for OSHA

1. Planning Functions

   The Assistant Secretary, or designee, will perform the following functions to ensure effective planning for the implementation of the NEMP:

   - Appoint the members of the Emergency Preparedness Executive Steering Committee (refer to Section XII for description of committee).
   - In coordination with executive staff, ensure that the responsibilities outlined in the NEMP are established and planning functions are executed.

2. Functions During a Covered Incident

   The Assistant Secretary, or designee, is OSHA's National Office Emergency Coordinator. He/she will perform the following functions during a covered incident:

   - In conjunction with the affected Regional Administrator, the Deputy Assistant Secretary, and appropriate executive staff members, determine if a declared emergency warrants Federal OSHA support/assistance and, if so, activate the NEMP.
   - Accept Mission Assignments from the Federal Emergency Management Agency (FEMA), within DHS, and other Federal organizations under the current FRP and the National Response Plan (NRP) (under development).
   - Coordinate with appropriate executive staff members to define OSHA's mission and objectives during an incident, including accepted Mission Assignments, and allocate Federal OSHA resources as needed. Resource allocation will include consideration for available funding and resources, and for supporting multiple covered incidents or fulfilling multiple Mission Assignments, when necessary.
   - Activate the OSHA National Office Emergency Operations Center Plan (see Section X and Appendix C) and identify necessary staffing level.
   - Activate the Crisis Communications Plan (see Appendix F).
   - Implement the OSHA Continuity of Operations Plan (COOP), when necessary.

- Coordinate with the Department of Labor (DOL) Office of Security and Emergency Management and provide an OSHA representative to staff the DOL Emergency Management Center to ensure effective coordination, when necessary.

B. Regional Administrator

The Regional Administrator, or his/her designee, will perform the following functions to plan and prepare for providing support and assistance during a covered incident:

1. Planning Functions

- Develop a Regional REMP.
- Ensure that the REMP identifies the Regional/Area/State plan/Consultation Project response resources and how these will be allocated and managed to provide worker health and safety support during a covered incident (see Appendix D for REMP Model Outline).
- Update the REMP as necessary.
- Designate key personnel (Federal and State) to fill the roles and complete the functions specified in the REMP during a covered incident.
- Provide designated personnel (Federal and State) with the training and personal protective equipment necessary to perform their assigned roles/functions and implement the REMP. Training will include field and table top exercises.
- Designate key senior personnel (Federal and State) to act as OSHA On-site Leaders/Coordinators and ensure these individuals receive OSHA's recently developed Risk Management Training, OTI 3600 and OTI 3610 ["OSHA Technical Assistance for Emergencies" and "OSHA On-Site Leaders/Coordinators Course" respectively].
- Develop a list of safety and health technical experts, equipment, and other resources within the Regional, Area, State plan, and Consultation Project offices. This list shall be included in the REMP and provided to the Director, Directorate of Science, Technology, and Medicine, and the Director, Directorate of Cooperative and State Programs.
- Involve State plan and Consultation Projects in all aspects of OSHA's emergency preparedness effort and share technical assistance as requested.
- Coordinate and develop a predetermined protocol for integration and coordination with each State plan during a covered incident occurring in the State or elsewhere in the Region. (See Section IX.C. for the elements that should be included in the protocol.) Identify mutual expectations for support and delineate mutual responsibilities. Ensure that such agreements will provide for effective occupational safety and health response during covered

incidents occurring in State plan States. A summary of these agreements shall be included in the REMP, and be provided to the Directorate of Cooperative and State Programs. (See Appendix D for REMP Model Outline.)

- The role of the States operating plans only for public employees will differ from that of the States operating plans for public and private sector employees, to reflect the limited jurisdiction of those programs and on-going Federal responsibility for private sector coverage.
- If a State plan is unable to participate in the development of an effective, coordinated agreement, the RA will develop a plan for covered incidents occurring in that State and include a summary of the plan in the REMP.

- Coordinate with other Federal, State, and local government emergency management, law enforcement, and response organizations to communicate OSHA's response resources and capabilities, and identify staffing needs within these organizations' Emergency Operations Centers or their equivalents. Through this coordination, the RA will identify opportunities for and ensure participation in joint planning meetings and preparedness exercises. In a State plan State, communication with State and local government entities (i.e., State Emergency Management Organizations, State Emergency Response Committees (SERCs), Local Emergency Planning Committees (LEPCs), and local law enforcement) should be coordinated with the State plan.

2. Functions During a Covered Incident

The Regional Administrator, or his/her designee, will perform the following functions during a covered incident:

- Determine the need for Regional support and assistance during an incident and, if so, activate the REMP.
- Contact and coordinate with the Assistant Secretary or his/her designee, to request additional National Office support and resources, when necessary.
- Coordinate response communication with the National Office and serve as the single point of contact in the Region, whether the incident occurs in a State plan State or in a Federal enforcement State.
- If the covered incident occurs in a State plan State, contact and coordinate with the State plan officials to determine roles and responsibilities in accordance with the agreements summarized in the REMP.

C. State Plan States

1. Planning Functions

The State plan State will perform the following functions to plan and prepare for providing support and assistance during a covered incident in that State or elsewhere in the Region.

- Coordinate with the Regional Administrator to develop a predetermined protocol for integration and coordination during a covered incident, and mutual expectations for support, including:
  - (a) Emergency contact and REMP activation procedures.
  - (b) Timely notification of State plan officials when Federal OSHA, in its Federal emergency preparedness coordination role, intends to be or is present in the State in an official capacity, including information about the Agency's activities and objectives.
  - (c) Delineation of Federal OSHA and State plan mutual responsibilities in response to an incident in the State:
    1) Identify whether the State plan is:
       - Able and willing to provide lead occupational safety and health response independently, with Federal OSHA providing only liaison at the national level;
       - Able and willing to provide lead occupational safety and health response with Federal OSHA assistance; or
       - Requesting that Federal OSHA assume lead response with State assistance.
    2) Specifically address expected assistance roles including:
       - Safety monitoring;
       - Health monitoring;
       - Respirator distribution and fit testing;
       - HASP oversight and maintenance.
    3) Delineate responsibility for coverage of private sector, and State and local government entities.
    4) Address the limitations of coverage by State plans with jurisdiction only over public sector employees. Federal OSHA will likely retain the primary response role.
  - (d) A description of mutual expectations for support, including:
    1) Available resources, such as personnel and equipment, that will be allocated by the Regional Office and the State plan during a covered incident; and
    2) Any agreements to provide support during covered incidents in other States and/or Regions.
  - (e) A strategy for coordinated outreach.
  - (f) A strategy for coordinating the provision of State plan technical experts and equipment to Federal States during a response to a covered incident outside the State plan.

2. Function During a Covered Incident

The State plan State will perform the following function during a covered incident:

- Coordinate with the Regional Administrator to implement the predetermined protocols for integration and coordination during a covered incident.

D. Consultation Projects

1. Planning Function

The Consultation Project will perform the following function to plan and prepare for providing support and assistance during a covered incident:

- Coordinate with the Regional Administrator to develop expectations for support and available resources.

2. Function During a Covered Incident

The Consultation Project will perform the following function during a covered incident:

- Coordinate with the Regional Administrator to provide personnel and resources based on the expectations identified during planning.

E. Director, Directorate of Administrative Programs

1. Planning Functions

The Director, Directorate of Administrative Programs (DAP), will perform the following functions to plan and prepare for the implementation of the NEMP:

- Facilitate the arrangement of appropriate Francis Perkins Building (FPB) office space for the establishment of a temporary OSHA National Office Emergency Operations Center (EOC) for the duration of an emergency. The office space will be suitably outfitted to accommodate the office, computer, and communications equipment identified in the OSHA National Office Emergency Operations Center Plan (Appendix C) and Appendix L.
- Coordinate with the Director, Directorate of Information Technology, to ensure that the computer, communications, and office equipment identified in Appendix L is available for use during a covered incident and is routinely maintained.
- Designate and train DAP personnel to staff the OSHA National Office EOC.
- Facilitate document and record management to ensure all incident-related documentation is maintained as described in existing OSHA Directives.
- Coordinate development of the Emergency Contact List and provide the List to each of the individuals with assigned

roles/functions under the NEMP. The Emergency Contact List must be developed and included in Appendix E of the NEMP within 90 days of the NEMP signature date. This list will be updated as necessary (e.g., turnover or reassignment of contact personnel), minimally every two years.

2. Functions During a Covered Incident

The Director, or his/her designee, will perform the following functions during a covered incident:

- Address the following during a covered incident: priority administrative services for Federal OSHA/State plan/Consultation Project response personnel (e.g., staffing/scheduling assistance, payroll adjustments for overtime), transportation (standard air/rail routes and local travel), lodging, and emergency procurement of equipment and supplies.
- Ensure that the computer, communications, and office equipment identified as necessary during a covered incident is placed in the OSHA National Office EOC.
- Provide designated personnel to staff the OSHA National Office EOC.
- Throughout an incident and at the completion of operations, oversee reimbursement from DHS or the appropriate Lead Agency for completion of accepted Mission Assignments.

F. Director, Office of Communications

1. Planning Functions

The Director, Office of Communications (OC), will perform the following functions to plan and prepare for the implementation of the NEMP:

- Develop a Crisis Communications Plan that defines how public and media communication will occur and ensures that OSHA's message and related information are expressed clearly and in a consistent manner. The plan should address coordination with State officials for incidents occurring in a State plan State. To the extent possible, the plan will be consistent with DHS's national public communications strategy and the Joint Information Center (JIC) concept. This plan must be developed, provided to the Emergency Preparedness Executive Steering Committee, and included in Appendix F of the NEMP within 60 days of the NEMP signature date.
- Update the Crisis Communications Plan as necessary, at least annually.
- Designate and train personnel to staff the OSHA National Office EOC and other governmental organization national and regional level operations/information centers (e.g., JIC).
- Train designated and other affected personnel to perform their assigned roles in implementing the Crisis Communications Plan.

2. Functions During a Covered Incident

The Director, or his/her designee, will perform the following functions during a covered incident:

- Implement the Crisis Communication Plan.
- Provide designated personnel to staff the OSHA National Office EOC and other federal organization operations/information centers as necessary.
- Deploy personnel to the JIC/Region/incident site when requested.

G. Directorate of Information Technology (DIT)

1. Planning Functions

The Director, Directorate of Information Technology (DIT) will perform the following functions to plan and prepare for the implementation of the NEMP:

- Ensure that the OSHA National Office EOC is able to accommodate the computer and communications equipment listed in Appendix L during a covered incident, e.g., sufficient electrical plugs, network connections, telephone jacks, etc.
- Ensure that network and web applications (intranet, internet, public folders, and shared directories), and individual email accounts are available to designated OSHA response personnel from remote locations.
- Designate and train DIT personnel to maintain the computer and communications equipment that may be used in the OSHA National Office EOC during its operation.

2. Functions During a Covered Incident

The Director, or his/her designee, will perform the following functions during a covered incident:

- Install available computer and communications equipment that is considered necessary in the OSHA National Office EOC (see Appendix L).
- Ensure designated personnel are readily available to maintain the OSHA National Office EOC computer and communications equipment, and provide support for remote equipment use (laptops).
- Create a unique email address for the OSHA National Office EOC to be used for communication with OSHA personnel in this location during a covered incident. Messages in the OSHA National Office EOC "inbox" should be accessible to all OSHA personnel assigned to work in the OSHA National Office EOC.
- Deploy technical experts to Region/incident site when requested.

H. Directorate of Science, Technology, and Medicine (DSTM)

1. Planning Functions

   The Director, Directorate of Science, Technology, and Medicine (DSTM) will perform the following functions to plan and prepare for the implementation of the NEMP:

   - Act as chairperson for the Emergency Preparedness Executive Steering Committee.
   - Provide technical assistance in emergency planning and preparedness to OSHA, other government organizations, and private sector employers, including developing resources such as e-Tools, Safety and Health Information and other bulletins, and public/internal webpages.
   - Coordinate the development, training, and readiness of Specialized Response Teams for response to covered incidents involving toxic chemicals, biological agents, ionizing radiation, and structural collapse hazards.
   - Coordinate the creation of the "go-kits" that will be used by Specialized Response Team members during response to a covered incident.
   - Coordinate OSHA's participation in the National Response Team and the Regional Response Teams.
   - Coordinate the development of a comprehensive list of technical experts within the National Office, Regional and Area offices, State plan State offices, and Consultation Project offices. Technical experts include individuals with appropriate security clearances, and unique skills, knowledge, or training related to emergency response, and incidents involving weapons of mass destruction and structural damage. The comprehensive list will be compiled, posted on OSHA's intranet, and included in Appendix I within 90 days of the NEMP signature date.
   - Update the comprehensive list of safety and health technical experts as necessary, minimally every year.
   - Identify contract laboratories throughout each Region to provide rapid-turn around analysis of samples collected during a covered incident. Laboratories will include those capable of performing analyses (using standard industrial hygiene analytical methods) for agents considered weapons of mass destruction. A list of contract laboratories is included in Appendix G.
   - Coordinate with the Director, DAP and ensure that appropriate contractual arrangements are in place with the identified laboratories prior to an incident.
   - Identify; continually evaluate; and purchase, rent, or otherwise acquire the best available detection, analytical, and other essential equipment for the Specialized Response Teams.

- Maintain the availability of the Government Emergency Telephone System (GETS) for designated OSHA response personnel and ensure the selection and use of other priority communication systems, as practical.
- In conjunction with the Director, Directorate of Enforcement Programs, and the Director, Directorate of Standards and Guidance, coordinate personal protective equipment selection and purchase to ensure an equipment reserve adequate for use by 50 OSHA response personnel working 24 hours a day, seven days a week, for two weeks. The reserve should include sufficient protective equipment for personnel to respond to the range of agents considered weapons of mass destruction and to likely structural hazards over this interval of time.
- Develop an Emergency Transportation Plan to address the transport of HRT personnel and equipment when standard air/rail routes and carriers are not available for use. This plan will be developed and included in Appendix H within 60 days of the NEMP signature date.
- Designate and train personnel to staff the OSHA National Office EOC and other federal organization operations centers.

2. Functions During a Covered Incident

The Director, or his/her designee, will perform the following functions during a covered incident:

- Deploy the HRT to the incident site when requested.
- Coordinate deployment of the Specialized Response Teams to the incident site, at the request of the Assistant Secretary, the Regional Administrator, or their designees.
- Provide rapid turn-around analytical support through Salt Lake Technical Center and identified contract laboratories, as requested.
- Provide additional personal protective equipment, sampling and detection equipment, and other equipment through the Cincinnati Technical Center, as requested.
- Implement the Emergency Transportation Plan when necessary.
- Provide designated personnel to staff the OSHA National Office EOC and other federal organization operations centers as appropriate.
- Deploy safety and health technical experts to the Region/incident site when requested.
- Coordinate with the Director, OC, the Director, Directorate of Enforcement Programs, and the Director, DIT, to post critical information, publications, and resource links on OSHA's Public Website once cleared.

- At the conclusion of a covered incident, ensure critique of incident operations and identify the "lessons learned" noted by deployed HRT and Special Response Team personnel. The "lessons learned" must be summarized and provided to the Emergency Preparedness Executive Steering Committee for use in updating the NEMP.

I. Director, Directorate of Enforcement Programs (DEP)

1. Planning Functions

   The Director, Directorate of Enforcement Programs (DEP) will perform the following functions to plan and prepare for the implementation of the NEMP:

   - Ensure that additional capabilities are available to respond to anticipated increased volume through the Compliance Hot-line and E-correspondence systems during a covered incident.
   - Based on experience during previous incidents (i.e., World Trade Center, Anthrax spore contamination), identify likely incident-related interpretation requests and provide pre-approved technical resources and interpretive information that address these requests for OSHA, Hot-line, and E-correspondence personnel to reference.
   - Designate and train personnel to staff the OSHA National Office EOC and other Federal organization operations centers.

2. Functions During a Covered Incident

   The Director, or his/her designee, will perform the following functions during a covered incident:

   - Provide responses to requests for regulatory interpretation and ensure a coordinated effort to provide consistency in these responses among OSHA information sources (personnel, hotline, e-correspondence, publications, etc.).
   - Provide advice and consultation on worker safety and health regulations for Inter-Agency Support (e.g., Environmental Protection Agency (EPA), National Response Team/Regional Response Team (NRT/RRT) agencies, as well as to the On-Scene Coordinator (OSC), including supporting any established Command/Operations Centers.
   - As the incident unfolds, develop incident-specific, interpretive information and resources that address critical requests being made frequently during the incident. Provide these resources to OSHA, Hot-line, and E-correspondence personnel to reference in response to frequent requests.
   - Assist employers and employees with incident-related and interpretive information through the Agency's Hot-line and E-correspondence systems.

- In coordination with DIT and OC, develop and post, on the OSHA Public Website, incident-related interpretive information and resource links for employers and employees.
- Deploy safety and health technical experts to Region/incident when requested.
- Provide personnel to staff the OSHA National Office EOC.
- At the conclusion of a covered incident, ensure that a critique of incident operations is completed that identifies the "lessons learned" noted by deployed Regional personnel. The "lessons learned" must be summarized and provided to the Emergency Preparedness Executive Steering Committee for use in updating the NEMP.

J. Directorate of Cooperative and State Programs (DCSP)

1. Planning Functions

   The Director, Directorate of Cooperative and State Programs (DCSP), will perform the following functions to plan and prepare for the implementation of the NEMP:

   - Assist the Director, DSTM, in developing lists of safety and health technical experts including those from State plans and Consultation Projects.
   - Work with the Regional Administrators and other Directorates to assure that all planning includes consideration of the State plans and Consultation Projects.
   - Coordinate with the Director, DSTM, and the Director, Office of Training and Education to develop and administer the Risk Management training program and training programs addressing NEMP policies/procedures, Weapons of Mass Destructions (WMD), and other topics, as necessary.
   - Coordinate with the Director, DSTM, to ensure the on-going training of the Specialized Response Team members.
   - Survey the Regional Administrators to identify their training needs and plan for the continued and ad hoc training considered necessary to support Regional response personnel.
   - Identify new potential cooperative program stakeholders (e.g., VPP, Alliance, and Strategic Partnership participants) with specialized knowledge, skills, and capabilities in WMD and terrorist response that will enhance internal safety and health technical expertise and resources prior to and during covered incidents.
   - Coordinate with existing cooperative program stakeholders to identify their employees with applicable skills, knowledge, and expertise, and ensure that this information is available to staff as needed.

- Work with existing cooperative program stakeholders to identify emerging terrorism-related health and safety issues and develop methods to address these issues through planning, outreach, and training.
- Assist in developing opportunities for joint training, field exercises, and technical information sharing among Federal OSHA, State plan States, Consultation Projects and other Federal, State, and local emergency management/response organizations.
- Designate and train personnel to staff the OSHA National Office EOC.

2. Functions During a Covered Incident

The Director, or his/her designee, will perform the following functions during a covered incident:

- Assist in coordination with affected State plan officials, as necessary, when an incident occurs in a State plan State.
- Coordinate with State plans and Consultation Projects that are not impacted directly by the incident, to provide additional information, assistance, and technical resources.
- Assist in deployment of State plan and Consultation Project safety and health technical experts and other resources to Region/incident, when requested.
- Deploy personnel to the Region/incident, when requested.
- Provide personnel to staff the OSHA National Office EOC.
- At the conclusion of a covered incident, participate in the preparation of a critique of incident operations and identify the "lessons learned," including those noted by deployed State plan and/or Consultation Projects personnel, and VPP, Alliance, or Strategic Partnership participants. The "lessons learned" must be summarized and provided to the Emergency Preparedness Executive Steering Committee for use in updating the NEMP.

K. Director, Directorate of Standards and Guidance

1. Planning Functions

The Director, Directorate of Standards and Guidance (DSG), will perform the following functions to plan and prepare for the implementation of the NEMP:

- Coordinate with the Director, DSTM, and the Director, DEP, to develop guidance on personal protective equipment selection and use, respiratory protection selection and use, and exposure guidelines for WMD and other related topics as necessary.
- Designate and train personnel to staff the OSHA National Office EOC.

2. Functions During a Covered Incident

The Director, or his/her designee, will perform the following functions during a covered incident:

- Deploy safety and health technical experts to Region/incident when requested.
- Provide designated personnel to staff the OSHA National Office EOC as necessary.

L. Director, Directorate of Construction

1. Planning Functions

The Director, Directorate of Construction (DOC), will perform the following functions to plan and prepare for the implementation of the NEMP:

- Based on experience during previous incidents (i.e., World Trade Center), identify critical incident-related interpretation requests and develop pre-approved technical resources and interpretive information on structural damage and other likely construction-related hazards/exposures.
- Coordinate with National Institute of Science and Technology (NIST) and the FEMA Urban Search and Rescue (US&R) personnel to develop a Memorandum of Understanding that details how each Agency will support one another during response to a covered incident that involves structural collapse hazards.
- Coordinate with NIST to ensure that OSHA's structural specialists and technical experts, and NIST's National Construction Team will be integrated during response to a covered incident.
- Provide structural collapse/re-entry expertise to the Structural Collapse Specialized Response Team.
- Designate and train personnel to staff the OSHA National Office EOC.

2. Functions During a Covered Incident

The Director, or his/her designee, will perform the following functions during a covered incident:

- Provide responses to requests for regulatory interpretation and ensure a coordinated effort to provide consistency in these responses among OSHA information sources (personnel, hotline, e-correspondence, publications, etc.).
- As the incident unfolds, develop incident-specific, approved technical resources and interpretive information to address critical requests being made frequently during the incident.
- Provide technical support to and deploy designated experts for the Structural Collapse Specialized Response Team.

- In conjunction with OSHA's Structural Collapse Specialized Response Team, coordinate with NIST's National Construction Safety Team when this team is on site.
- At NIST's request, provide structural engineering experts for NIST's National Construction Team to assist this group in determining the cause of a structural collapse related to a covered incident.
- Deploy safety and health technical experts to Region/incident when requested.
- Provide designated personnel to staff OSHA National Office EOC as necessary.

M. Special Assistant for Emergency Preparedness

1. Planning Functions

   The Special Assistant will perform the following functions to plan and prepare for the implementation of the NEMP:

   - Coordinate with the Assistant Secretary and other executive staff to ensure that the revision in policies and procedures outlined as a result of the "lessons learned" provided to the Committee are implemented.
   - Represent the Assistant Secretary and OSHA with other agencies, including DHS, State and local agencies, and non-governmental emergency preparedness and response organizations.
   - Advise the Assistant Secretary, the Deputy Assistant Secretaries, and the Directorates on national emergency preparedness and response issues.
   - Coordinate with Federal Law Enforcement and other agencies to ensure that Federal OSHA, State plan, and Consultations Project personnel are provided access to the site of a nationally significant incident.

2. Function During a Covered Incident

   The Special Assistant, or his/her designee, will perform the following function during a covered incident:

   - Act as the primary contact for FEMA's Emergency Support Team (EST), which primarily includes Washington, D.C., based Federal organizations.

X. The OSHA National Office Emergency Operations Center

The OSHA National Office EOC serves as the central location for internal National Office command and control during a covered incident. When initiated by the Assistant Secretary or the Deputy Assistant Secretary, the OSHA National Office EOC will function as OSHA's National Command Post during a response.

The OSHA National Office EOC coordinates with the DOL Office of Security and Emergency Management (OSEM), and other Federal operation centers. The OSHA

National Office EOC facilitates the coordination of safety and health technical experts, equipment, and other resources though centralized operations. The OSHA National Office EOC provides a single point of contact for Regional personnel and Federal organizations requesting support and allows for the coordinated allocation of resources from multiple Directorates to meet these requests. The OSHA National Office EOC structure ensures that Regional Administrators, State plans, Consultation Project, and other Federal organizations need make a single call to identify and initiate a request for personnel, equipment, and other resources. The OSHA National Office EOC structure also provides for the coordination of incoming and outgoing information about incident circumstances to ensure that information is valid and consistent. During multiple covered incidents or during an incident where resources are requested by multiple organizations, the OSHA National Office EOC structure provides the means for exchanging relevant information for prioritizing response requests and allocating Federal OSHA resources accordingly.

The key personnel, critical operations, and physical location and equipment requirements for the OSHA National Office EOC are outlined in *The OSHA National Office Emergency Operations Center Plan*, located in Appendix C.

XI. National Office Safety and Health Technical Expertise and Response Resources

A. Safety and Health Technical Expertise

When assistance is requested, the Assistant Secretary, or designee, will ensure that the appropriate personnel are dispatched to support Regional efforts and those of other Federal organizations to protect response and recovery workers and communicate with the public during a covered incident. To provide support quickly and efficiently, OSHA has identified personnel within the various Directorates, Regions, State plans, and Consultations Projects with unique skills, knowledge, and experience in: emergency response, clean-up, WMD, medical monitoring and prophylaxis, sampling and analytical methods, PPE, and other key topics. These individuals are identified in the Comprehensive Safety and Health Technical Expert Lists located in Appendix I.

B. Specialized Response Teams

Specialized Response Teams are comprised of OSHA technical experts with additional skills, training, and knowledge about a specific class of weapons and structural collapse. These teams also have access to the specialized PPE and monitoring equipment appropriate for the agent/hazard considered their team specialty. Specialized Response Teams will be assembled, equipped, and trained to respond to covered incidents involving the following: Toxic Chemicals, Biological Agents, Ionizing Radiation, and Structural Collapse Hazards. The structure, resources, and additional training for each Specialized Response Team are described in Appendix J.

XII. OSHA's Emergency Preparedness Executive Steering Committee

OSHA's Emergency Preparedness Executive Steering Committee (Committee) will be established to oversee the Agency's implementation of the NEMP, advance OSHA's level of emergency response preparedness, and increase OSHA's capabilities for response to terrorist incidents involving WMD. The Committee chairperson is the Director, DSTM. The Committee will meet at least quarterly (see Appendix K) and will perform the following functions:

- Develop the Committee's mission, goals, and charter (included in Appendix K).
- Address intra and interagency coordination and make recommendations regarding training, equipment, additional resources and budget.
- Identify and coordinate with key national law enforcement, fire protection, and other agencies and organizations to ensure OSHA personnel are able to access the sites of nationally significant incidents.
- Review the "lessons learned" summaries resulting from the Regional and National Office critiques coordinated by the Director, DSTM, the Director, DEP, and the Director, DCSP and prepare a comprehensive report for the Assistant Secretary.
- Provide input on policies involving training, equipment, and additional resources (including budget issues) for OSHA personnel as well as for Federal, State, local, and private responders.
- Develop and oversee the implementation of corrective actions in response to the "lessons learned."
- Identify "best practices" among the Regional REMPs and make recommendations for wider application.
- Review the REMPs developed by each Region for consistency and compatibility with the NEMP.
- Coordinate OSHA's participation in TOPOFF exercises.
- Coordinate and participate in inter- and intra-Agency Table Top exercises (inter-regional and with other response organizations).
- Provide executive level review of the NEMP including policies written in support of the plan.
- Assure that the NEMP is updated, minimally, annually and each time the plan is activated.
- Advise the Assistant Secretary on any issues related to these functions.

XIII. Training

A. Initial Training

All OSHA personnel assigned a role or function related to implementing the NEMP during a covered incident will be trained in the basic elements of the NEMP and the specific responsibilities of their assigned role. Initial training on the basic elements of the NEMP will be developed and implemented by DCSP's Office of Training and Education, in conjunction with the affected Directorates. All OSHA personnel assigned a role or function related to implementing either the NEMP or REMP will complete OTI 345: Basic Incident Command System [Emergency Management Institute (FEMA) Independent Study Course IS-195] and the ISC Level 200 course, to ensure their familiarity with ICS concepts and nomenclature. In addition, Regional Administrators and their designees, the Assistant Secretary, the Deputy Assistant Secretaries, National Office Executive Staff, and other designated Senior Management staff will complete ICS for Executives (Training Module 17 of the ICS training program).

Regional OSHA On-site Leaders/Coordinators will participate in the initial training identified above and in OSHA's Risk Management training program, which includes OTI 3600: OSHA Technical Assistance for Emergencies (Course A) and

OTI 3610: OSHA On-site Leaders/Coordinators Course (Course B), currently under development. Key concepts in this training will include:

- Risk management.
- Conducting site risk assessment for chemical-warfare, biological, radiological, nuclear, and explosive incidents.
- Developing and evaluating site safety and health plans for these kinds of incidents.
- Understanding additional ICS concepts
- Quantifying responder exposure during these kinds of incidents using appropriate monitoring techniques and detection equipment.
- Interpreting the data collected using appropriate analysis techniques and exposure guidelines.
- Using this data to establish hot zones, safe zones, perimeters for different levels of PPE, etc.
- Selecting appropriate PPE, and using, fit testing, and decontaminating the PPE selected for these kinds of incidents.

Additional training for designated OSHA personnel may include:

- Ionizing radiation: radiological dispersal devices, health effects, signs/symptoms of exposure, appropriate monitoring devices, and exposure controls and PPE, for personnel who will respond to covered incidents involving radiological dispersal devices.
- Biological agents: routes of exposure, health effects, signs/symptoms of exposure, appropriate monitoring devices, and exposure controls and PPE, for personnel who will respond to covered incidents involving biological agents.
- SCBAs/supplied air respirators: inspection, use, and maintenance.
- Advanced Detection Equipment: calibration and use of state-of-the-art direct reading instrumentation appropriate for detection of toxic chemicals, biological agents, and ionizing radiation.

B. Table Top Exercises

Table Top exercises will be coordinated by the Emergency Preparedness Executive Steering Committee and will be conducted twice annually. Table Top exercises will serve to enhance National Office and Regional OSHA personnel preparedness and provide for annual refresher training. Participation in TOPOFF is considered a Table Top exercise, and can be used by Regional and National Office personnel as one of the two annual exercises required. Table Top exercises will involve mock covered incidents and may be conducted in conjunction with other Federal organizations. Table Top exercises will be conducted within the National Office and will include some or all of the Regional Offices.

Table Top exercises will include a critique period. Critical areas for improvement will be documented by the Director, DSTM, and the Director, DEP. Collectively, the Directors, DSTM and DEP, will summarize critical areas for improvement and recommended revisions in practices/procedures for review by the Emergency Preparedness Executive Steering Committee. The Emergency Preparedness Executive Steering Committee will communicate the Table Top exercise results

directly to the Assistant Secretary and the revised practices/procedures to all OSHA personnel with assigned roles/functions under the NEMP. Revised practices/procedures will be stressed during subsequent training.

C. Specialized Response Teams

Initial and annual training for members of the Specialized Response Teams will be coordinated by the DSTM HRT and are discussed in Appendix J.

D. Participation in TOPOFF Exercises

OSHA's participation in all future TOPOFF exercises will be coordinated by the Emergency Preparedness Executive Steering Committee (see Section XII). OSHA will participate at the local, Regional, and National level. OSHA's participation in this exercise will enhance intra-agency preparedness and inter-agency coordination with other Federal response organizations.

E. Coordination with Other Agencies

Where advantageous, OSHA training initiatives will be integrated and coordinated with other Federal response organizations as DHS, EPA, CDC, U.S. Coast Guard, and the Department of Energy (DOE). OSHA personnel that may interact with other Federal organizations, like personnel assigned to staff national level operations centers, will attend appropriate training offered by other Federal organizations. The Director, DSTM, and the Emergency Preparedness Executive Steering Committee will identify and attempt to consistently promote OSHA participation in national level exercises conducted by other organizations like FEMA, the EPA, and the NRT.

XIV. Plan Revision and Update

It is OSHA's policy to evaluate the effectiveness of the policies and procedures outlined and the resources identified in this NEMP each time they are implemented or used, and at least annually. Within 90 days of the conclusion of OSHA operations initiated under the NEMP, the Director-DEP and Director-DSTM, with assistance from the Director-DCSP, will coordinate an overall OSHA critique among the appropriate Regional and National Office, State plan, and Consultation Project personnel. This process may necessitate the inclusion of other private sector, public sector, and Federal organization stakeholders. Each Director will identify and summarize the critical "lessons learned" identified during the critique. Each Director will provide the written summary to the Director, DSTM, for review by the Emergency Preparedness Executive Steering Committee. Based on the outcome of its review of these summaries, the Emergency Preparedness Executive Steering Committee will evaluate and revise the NEMP as necessary.

The Emergency Contact List will be reviewed and updated by the Director, DAP, every two years. The Safety and Health Technical Expert Lists and other applicable information contained in the NEMP will be reviewed and updated annually, or as critical information changes, whichever comes first, by the responsible parties identified in Section IX.

Appendix A — Authorities

1. Statutory References for OSHA's Mission under the OSH Act of 1970.
2. The Federal Response Plan (FRP) (January 2003) – OSHA provides support and assistance under the Occupational Safety and Health Support Annex, Emergency Support Function (ESF) #3 – Public Works and Engineering, ESF #9 – Urban Search and Rescue, and ESF #10 – Hazardous Materials.
3. National Oil and Hazardous Pollution Contingency Plan, or the National Contingency Plan (NCP) (as amended 1994) – OSHA provides advice and consultation to EPA, other NRT/RRT agencies, and the On Scene Coordinator/Remedial Project Manager regarding hazards to persons involved in response activities and taking any other action necessary to assure workers are properly protected.
4. State Plan Authority, Section 18 of the OSH Act (1970)

Appendix B — References and Key Definitions

References:

1. Homeland Security Act of 2002 [PDF]
2. Department of Homeland Security Public Webpage
3. Homeland Security Presidential Directive/HSPD – 5 "Management of Domestic Incidents" (February 2003)
4. Letter from Assistant Secretary John Henshaw to Michael D. Brown, Acting Under Secretary for Emergency Preparedness and Response for the Department of Homeland Security, dated April 4, 2003
5. Internal memo from John Henshaw to OSHA personnel regarding OSHA Planning and Training Activities dated March 3, 2003
6. OTI # 345: Basic Incident Command System [Emergency Management Institute (FEMA) Independent Study Course IS-195]
7. OTI #346: Emergency Response to Terrorism [National Fire Academy (FEMA) Self Study ERT: SS Q 534]
8. OSHA's Region II WTC Lessons Learned and Regional Emergency Management Plan (REMP) Webcast
9. Robert T. Stafford Disaster Relief and Emergency Assistance Act (the "Stafford Act") (as amended October 2000)

Key Definitions:

Alliance Program participants: means organizations that are committed to workplace safety and health and have agreed to collaborate with OSHA to prevent injuries and illnesses in the workplace. Alliance agreements include a set of short-and long-term goals, which target training and education, outreach and education, and promoting a national dialogue on workplace health and safety.

Assistant Secretary: means the Assistant Secretary of Labor for Occupational Safety and Health.

Biological Agent: means a biological organism or a toxin produced by an organism that is intended for use in warfare or terrorist activities to kill, seriously injure, or seriously incapacitate people through its pathogenic or physiological (toxin) effects. Biological agents include bacterial agents (e.g., those causing anthrax, plague, typhoid), viral agents (e.g., those causing small pox, yellow fever, ebola), rickettsiae agents (e.g. those causing Typhus, Q fever, Rocky Mountain Spotted fever), and biological toxins (e.g., botulinum toxin, staphylococcal enterotoxin B, Ricine). [National Institute of Justice Guide 101-00: An Introduction to Biological Agent Detection Equipment for Emergency First Responders.]

Chemical Agent: means a chemical substance that is intended for use in warfare or terrorist activities to kill, seriously injure, or seriously incapacitate people through its physiological effects. The most common chemical agents are the nerve agents, GA (Tabun), GB (Sarin), GD (Soman), GF, and VX; the blister agents , HD (sulfur mustard) and HN (nitrogen mustard); and the arsenical vesicants, L (Lewisite). [National Institute of Justice Guide 100-00: Guide for Selection of Chemical Agent and Toxic Industrial Material Detection Equipment for Emergency Responders] (See also “Toxic Industrial Chemical.”)

Compliance Hot-line or Compliance Guidance Phone Line: means OSHA’s telephone system for receiving and responding to public inquires about interpreting OSHA standards. Callers are guided through the OSHA website to locate regulatory or technical information that answers their questions.

Consultation Projects: means a no-cost health and safety consultation program to assist smaller business employers identify and control or eliminate workplace hazards and worker exposures. Consultation Projects are largely funded by the Federal OSHA and delivered by State governments using well-trained professional staff. Consultation Projects are completely separate from the OSHA inspection effort.

Continuity of Operations Plan (COOP): means the plan adopted by the Department of Labor – OSHA that outlines how the Agency will restore essential functions at an alternate site and perform the functions for up to 30 days before returning to normal operations. Standard elements of a COOP include: Relocation Site; Essential Functions; Essential Personnel; Delegation of Authority; Order of Succession; Vital Records and Databases; Interoperable Communications; Critical Systems; Test, Training and Exercise; and Plan Maintenance. The COOP is contained in the DOL/COOP Information Management System.

Covered incident: means an incident or incident meeting the definition of “nationally significant incident” for which the Assistant Secretary invokes the NEMP, usually following an emergency declaration under the Robert T. Safford Act (“Stafford Act”).

Deployed assets: means technical experts including safety professionals, industrial hygienists, engineers, and others contracted by OSHA to assist the Agency during response to and recovery from a covered incident. OSHA Compliance Safety and Health Officers will direct the activities of these individuals on site.

Emergency declaration (under 501(b) of the Stafford Act): means any occasion or instance for which, in the determination of the President, federal assistance is needed to supplement State and local efforts and capabilities to save lives and to protect property and public health and safety, or to lessen or avert the threat of a catastrophe in any part of the United States. All requests for a declaration by the President that an emergency exists shall be made by the Governor of the effected State. The President may exercise any authority with respect to an emergency when he determines that an emergency exists for which the primary responsibility for response rests with the United States.

E-correspondence system: means OSHA's electronic mail system for receiving and responding to public inquires about OSHA.

Federal Response Plan (FRP): means the plan, adopted by the signatory federal agencies, which establishes a process and structure for the systematic, coordinated, and effective delivery of federal assistance to address the consequences of any major disaster or emergency declared under the Stafford Act. The FRP covers the full range of requirements following a disaster: saving lives, protecting property, and meeting basic human needs (response); restoring the disaster-affected area (recovery); and reducing vulnerability to future disasters (mitigation). The FRP applies to the signatory federal departments and independent agencies that may be tasked to provide assistance in a major disaster or emergency. The Department of Homeland Security Federal Emergency Management Agency is responsible for developing and maintaining the FRP.

Hazardous Waste Operations and Emergency Response Standard (or HAZWOPER): means the OSHA standard covering emergency response and recovery operations at a covered incident. The standard is codified for General Industry at 29 CFR 1910.120 and for Construction at 29 CFR 1926.65. The standard includes requirements for all emergency responders in paragraph (q) such as emergency planning, training, medical monitoring, PPE selection and use, incident command, and others. The standard also addresses clean-up operations at hazardous waste sites and post-emergency response sites in paragraphs (b) through (o). OSHA identifies requirements for clean-up operations such as: characterizing the site, developing a site-specific health and safety plan, training, medical monitoring, and others. In Federal OSHA enforcement States, Federal OSHA does not have jurisdiction over the public employees that may respond to hazardous substance releases, like local firefighters and police offices. HAZWOPER is unique in that the EPA adopted the standard for public employees and volunteers in States where Federal OSHA has jurisdiction, effectively covering public responders in all States. The EPA standard that provides this coverage is The Worker Protection Standard and it is codified at 40 CFR 311.

Health Response Team (HRT): means the designated group of industrial hygiene, safety, and other subject matter experts located in the Salt Lake Technical Center responsible for providing technical assistance in the areas of industrial hygiene and specialized engineering to OSHA's National, Regional, and Area Offices in support of Agency objectives. When requested, the HRT will respond to occupationally related emergencies involving the catastrophic releases of hazardous materials.

Emergency Preparedness Executive Steering Committee: means the group of individuals designated by the Assistant Secretary, or designee, that is responsible for broad oversight of the development, implementation, and maintenance of the NEMP. This committee addresses the technical and administrative issues necessary to ensure a coordinated intra-agency planning and preparedness effort for response to a domestic incident.

Incident Commander: means the senior emergency response official who responds to an emergency and is the On-scene Commander for that incident. As an incident grows in size or becomes more complex, a more highly qualified IC may be assigned by the responsible jurisdiction or agency. Depending on the type of incident and the authorities under which a response is coordinated, the IC could be any of the following individuals:

- a local law enforcement, emergency management, or fire official
- a State law enforcement, emergency management, or fire official
- an EPA or U.S. Coast Guard On-Scene Coordinator under an NCP response;
- a FEMA Federal Coordinating Officer during an FRP response;
- an FBI Special Agent-in-charge during a response to a terrorist incident; or
- an On-Scene Commander during a "Federal Radiological Emergency Preparedness Plan (FRERP) response.

Incident Command System (or Structure) (ICS): means an organizational structure for responding to emergencies. The structure is modular, flexible and can be expanded to meet complex situations or reduced for minor incidents. The ICS divides an emergency response into five manageable functions: Command, Operations, Planning, Logistics, and Finance. The Incident Commander retains responsibility for these functions unless delegated to another individual. In some incidents or applications only a few of the organization's functional elements may be formally established or delegated to another individual. The ICS is typically implemented at the local level by first responders (fire, police, and emergency management agencies). The ICS may be expanded to include a Unified Command for complex responses that require multi-agency resources.

Within the ICS, the Safety Officer is part of the Command function, see Safety Officer. **Note:** This document refers to the ICS used at an incident site and the ICS structures adopted by OSHA Regional offices to complement and integrate with the ICS used at the incident site.

Joint Information Center (or JIC): means a designated central location that serves as the clearinghouse for the release of public information related to the federal response operations conducted during an emergency. Generally, each federal organization involved in the response activities will have representatives assigned to the JIC. The JIC concept was created to support "one-voice" information sharing with the public.

Local Emergency Planning Committees (LEPCs): means the groups of individuals (local response officials, industrial representatives, emergency management officials, etc.) created under Title III of the Superfund Amendments and Reauthorization Act (SARA), known as the Emergency Planning and Community Right-to-Know Act (EPCRA), and appointed by the State Emergency Response Commission (SERC). EPCRA mandates that the LEPCs prepare local emergency plans. Other LEPC planning duties include holding public meetings to discuss emergency plans, receiving and responding to public comments, and distributing emergency

plans. Committees are also responsible for reviewing plans once each year or more frequently as dictated by changed circumstances in the community or at a facility. Finally, Committees must also evaluate the need for resources to develop, implement, and exercise, emergency plans. At present, there are more than 3,800 LEPCs across the country.

Major disaster declaration: means any natural catastrophe (including any hurricane, tornado, storm, high water, wind-driven water, tidal wave, tsunami, earthquake, volcanic eruption, landslide, mudslide, snowstorm, or drought), or, regardless of cause, any fire, flood, or explosion, in any part of the United States, which in the determination of the President causes damage of sufficient severity and magnitude to warrant major disaster assistance to supplement the efforts and available resources of States, local governments, and disaster relief organizations.

Mission Assignment: means a work order issued by DHS FEMA, under the Stafford Act, to another Federal agency authorizing the agency to perform work, provide services, and acquire materials, with a funding limitation, on a reimbursable basis. If an incident occurs, which may result in a declared major disaster or emergency requiring federal assistance, DHS FEMA can task some or all of the Emergency Support Functions (ESF) of the FRP. When an ESF is tasked to do work, a Mission Assignment is issued to the primary agency with a funding limitation and the requirements for the task(s) to be performed. The primary agency may in turn issue a Mission Assignment to a support agency, such as from EPA to OSHA. DHS FEMA also may task agencies directly for work outside the scope of the ESFs. An example of a Mission Assignment written from the EPA requesting OSHA support during the WTC operations is included at the end of Appendix B.

National Oil and Hazardous Pollution Contingency Plan (NCP): means the plan, codified at 40 CRF 300, which outlines the federal government's procedures and requirements for responding to oil spills and hazardous substance releases. The NCP provides a comprehensive system of accident reporting; outlines procedures and requirements for spill response, containment, and cleanup; and established a response headquarters, a National Response Team, and Regional Response Teams.

National Emergency Management Plan (NEMP): means the plan adopted by Federal OSHA's National Office, which establishes procedures and policy for the National Office's support of OSHA Regional [personnel/presence] during responses to nationally significant incidents.

National Incident Management System (NIMS): means DHS's planned incident management system to provide a consistent nationwide approach for Federal, State, and local governments to work effectively and efficiently together to prepare for, respond to, and recover from domestic incidents, regardless of cause, size, or complexity. To provide for interoperability and compatibility among Federal, State, and local capabilities, the NIMS will include a core set of concepts, principles, terminology, and technologies covering the incident command system; multi-agency coordination systems; unified command; training; identification and management of resources (including systems for classifying types of resources); qualifications and certification; and the collection, tracking, and reporting of incident information and incident resources.

Nationally Significant Incident: means an incident involving multiple fatalities, extensive injuries, massive toxic exposures, extensive property damage, or one that presents potential worker injury and generates widespread media interest. For the purposes of the NEMP, a nationally significant incident usually results in an emergency declaration under the Stafford Act and is likely, but not always, due to a terrorist act.

National Response Plan (or DHS's NRP): means DHS's comprehensive National plan for response to domestic incidents. The plan integrates the other primary Federal Government domestic prevention, preparedness, response, and recovery plans into one all-discipline, all-hazards plan. The NRP includes:

- a uniform and interoperable command structure (through the National Incident Management System or NIMS) designed to coordinate Federal, State, and local response activities;
- functional operations of the government's response to such an event;
- a consistent approach to reporting incidents, providing assessments, and making recommendations to the President, the Secretary, and the Homeland Security Council; and
- rigorous requirements for continuous improvements from testing, exercising, experience with incidents, and new information and technologies.

The NRP is described in HSPD-5, which is highlighted in this appendix under **References**. The NRP is under development and is tentatively scheduled to be issued in the Spring of 2004.

National Response Team (NRT): means the 16-agency organization responsible created by the NCP for interagency planning, preparedness, and coordination for oil and hazardous substance emergency response. NRT members include the federal organizations with responsibilities and expertise in emergency response to pollution incidents. The NRT provides policy guidance and assistance to emergency management and response organizations prior to incidents, and provides technical advice and access to resources and equipment from its member agencies to State and local governments during an incident. This interagency coordination and framework is replicated at the regional level in the Regional Response Team (RRT).

Office of Security and Emergency Management or DOL Office of Security and Emergency Management (OSEM): means the Department of Labor's Office of Security and Emergency Management. OSEM develops all policy, requirements, and guidance for the Department's Comprehensive Emergency Management System, including COOP, implemented at all DOL sites and facilities.

On-scene Coordinator (OSC): means the federal official (usually EPA or Coast Guard personnel) responsible for coordinating and directing federal response efforts and removal actions under the NCP.

OSHA On-site Leaders/Coordinators: means OSHA personnel, designated by the Regional Administrator, who by virtue of their experience or having completed OSHA Risk Management training will assume the primary role under the REMP for OSHA on-site decision-making, and for Safety and Health Risk Assessment and Management during response to a covered incident. The person in this position can, and often will, change as the circumstances of the incident dictate. [See Appendix D, Role of the OSHA On-site Leader/Coordinator]

OSHA Response Personnel: means the Federal OSHA, State plan State and Consultation Project personnel involved in nationally significant incidents.

OSHA Strategic Partnership: means a partnership between OSHA and groups of employers, employees, and employee representatives (sometimes including other stakeholders, and sometimes involving only one employer), which is an extended, voluntary, cooperative relationship to encourage, assist, and recognize their efforts to eliminate serious hazards and achieve a high level of worker safety and health.

OSHA National Office Emergency Operations Center (the OSHA National Office EOC): means the central location for internal National Office command and control during a covered incident. OSHA's National Office EOC is located in the Francis Perkins Building located at 200 Constitution Avenue NW, in Washington, D.C.

OSHA's National Office Emergency Operations Center Support Team (or National Office EOC Support Team): means the designated National Office personnel that staff the EOC and provide support to Regional offices and other federal organizations during a response to a covered incident. The EOC Support Team may include designated personnel from each Directorate; its members will vary according to the incident and the support necessary during response.

Radiological Dispersal Devices (or "Dirty Bomb"): means a bomb that combines conventional explosives, such as dynamite, with radioactive materials in the form of powder or pellets. Beyond the damages of the explosion, the main purpose of a dirty bomb is to frighten people and make buildings or land unusable for a long period of time. Almost any radioactive material can be used to construct an RDD, including fission products, spent fuel from nuclear reactors, and relatively low-level materials, such as medical, industrial and research waste. The level of radioactivity associated with an RDD is not anticipated to present an acute radiological hazard.

Regional: means, in most instances, the Federal OSHA Regional and Area offices, and State plan and Consultation Project offices or activities within the OSHA region.

Regional Administrator: means the individual with primary responsibility for managing, executing and evaluating all programs of the Occupational Safety and Health Administration (OSHA) in the region, including coordination with the State plans and Consultation Projects.

Regional Emergency Management Plan (REMP): means the plan, adopted by an OSHA Regional Office, describing the functional incident command structure and procedures that the Region will follow in the incident it is necessary to respond to a large-scale catastrophic incident, primarily terrorist acts.

Regional Response Team (RRT): See National Response Team.

Robert T. Stafford Disaster Relief and Emergency Assistance Act (the "Stafford Act"): means the legislation enacted [42 U.S.C. 5121 - 5206] to provide an orderly and continuing means of assistance by the Federal Government to State and local governments in carrying out their responsibilities to alleviate the suffering and damage which result from disasters.

Safety Officer: means the ICS function to assess hazardous and unsafe situations, and develop measures for assuring public and personnel safety. The Safety Office may exercise emergency authority to directly stop unsafe acts if personnel are in imminent, life-threatening danger. Only one Safety Officer will be named to an incident. The Safety Officer may have assistants as necessary, and the assistants may represent other agencies or jurisdictions.

Site-specific safety and health plan (or HASP): means a written plan that identifies the site tasks and hazards, and the work practices and exposure controls to protect site workers.

Specialized Response Team: means a designated group of OSHA health and safety technical experts who reside in the National and Regional Offices and are coordinated by the HRT. A team will have the specialized knowledge, training, skills, and equipment necessary to respond during covered incidents involving one of the following: chemical warfare agents, toxic industrial chemicals, biological agents, ionizing radiation, and structural collapses.

State plan States (State plans): means States that, under Section 18 of the OSHAct, operate their own OSHA-approved job safety and health programs under plans approved by Federal OSHA. There are currently 22 States and jurisdictions operating complete State plans (covering both the private sector, and State and local government employees) and four - Connecticut, New Jersey, New York, and the Virgin Islands - which cover public (State and local government) employees only. State plans must set and enforce job safety and health standards that are "at least as effective as" comparable Federal OSHA standards. State plans are required to extend coverage to State and local government employees, including law enforcement, firefighters, health care workers and other emergency responders.

State Emergency Response Commissions (SERCS): means the groups of individuals created under Title III of the Superfund Amendments and Reauthorization Act (SARA), known as the Emergency Planning and Community Right-to-Know Act (EPCRA), and appointed by the State Governor. EPCRA mandates that the SERC designate Emergency Planning Districts within the State to facilitate the preparation and implementation of local emergency plans. Each State Commission is also required to appoint members of a Local Emergency Planning Committee (LEPC) for each Emergency Planning District.

Toxic Industrial Chemical (or Material) (TIC or TIM): means a chemical other than a chemical warfare agent that has harmful effects on humans. A TIM is a specific type of industrial chemical - one that has a LCt50 (lethal concentration for 50% of the population multiplied by exposure time) less than 100,000 mg-min/m3 in any mammalian species and is produced in quantities exceeding 30 tons per year at one production facility. Examples include ammonia, chlorine, cyanogen chloride, and hydrogen cyanide. [National Institute of Justice Guide 100-00: Guide for Selection of Chemical Agent and Toxic Industrial Material Detection Equipment for Emergency Responders; publication provides a complete list of TIMs.]

Terrorism or terrorist act/incident/event/release: means any premeditated, unlawful act dangerous to human life or public welfare that is intended to intimidate or coerce civilian populations or governments.

TOPOFF (Top Officials): means a congressionally mandated, national-level, multi-agency, multi-jurisdictional WMD response exercise, designed to better prepare senior government officials at all levels to effectively respond to an actual terrorist attack involving WMD. TOPOFF is led by the Department of Justice, the federal agency designated to respond to domestic terrorist attacks, the Department of State, which has the lead for responding to international attacks, and the Department of Homeland Security. Participants are officials at the federal, State, and local levels who would direct crisis management and consequence management response to a real WMD attack.

Unified Command (or ICS/UC): means a **component** of an ICS that provides the organizational management tool to coordinate the effective involvement of the various agencies. The ICS/UC brings together the "incident commanders" of all major organizations involved in the response. The Unified Command is depicted as a triangle; the member placed at the top of the triangle has the final authority within the ICS for the response.

Voluntary Protection Programs (VPP): means an OSHA cooperative program designed to recognize and promote effective safety and health management. In the VPP, management, labor, and OSHA establish a cooperative relationship at a workplace that has implemented a strong program. VPP participants are a select group of facilities that have designed and implemented outstanding health and safety programs. Star participants meet all VPP

requirements. Merit participants have demonstrated the potential and willingness to achieve Star program status, and are implementing planned steps to fully meet all Star requirements.

Weapons of Mass Destruction: means explosive, incendiary, nuclear, biological, and chemical weapons. As defined in 18 U.S.C., Section 2332a, "the term 'weapon of mass destruction' means:

A. any destructive device as defined in section 921 of this title;

B. any weapon that is designed or intended to cause death or serious bodily injury through the release, dissemination, or impact of toxic or poisonous chemicals, or their precursors;

C. any weapon involving a disease organism; or

D. any weapon that is designed to release radiation or radioactivity at a level dangerous to human life."

Appendix C — The OSHA National Office Emergency Operations Plan and Information Flow Chart

A. Staffing

The Assistant Secretary, or designee, will initiate the OSHA National Office EOC and identify the staffing requirements for the OSHA National Office EOC Support Team based on the size and scale of the incident and the requests for support received. The OSHA National Office EOC Support Team may include representatives from each of the following:

a. OC
b. DAP
c. DEP
d. DOC
e. DSTM (including SLTC and CTC)
f. HRT/Specialized Response Teams
g. DIT
h. DCSP
i. DSG
j. Solicitor's Office

The OSHA National Office EOC will operate during the same interval as incident operations. OSHA does not anticipate needing to relocate the OSHA National Office EOC operations or access the OSHA network from this new location, unless the COOP is implemented. Provisions for relocation and alternative network access are included in the COOP.

During the initial response to a covered incident the OSHA National Office EOC is likely to be staffed 24 hours a day, seven days a week. Once it is determined that multiple shift staffing of the OSHA National Office EOC is required, the Assistant Secretary, or designee, will coordinate with the OSHA National Office EOC Support Team to develop staffing assignments for 8 or 12 hour, 7 day per week, shift rotation. The additional personnel necessary to staff multiple shifts will be assigned by individual Directorates and Offices. As the incident progresses and incident operations change, the OSHA National Office EOC interval of operations will also shift. The Assistant Secretary, or designee, will review and revise the OSHA National Office EOC interval of operation and level of staffing routinely. The Assistant Secretary will determine when the OSHA National Office EOC is no longer necessary and will decide when to cease operations.

B. Logistics

1. Physical Location

The OSHA National Office EOC will be located in a Francis Perkins Building (FPB) conference room temporarily, for the duration of the covered incident. This location will be accessible to the Assistant Secretary and designated OSHA National Office EOC Support Team members throughout the covered incident. DAP will prepare a FPB conference room to accommodate the equipment suggested in Appendix L as soon as practical. DIT will install available computer and communications equipment in the room when the Assistant Secretary, or designee, determines that the OSHA National Office EOC is necessary to allow National Office to fulfill its mission during a covered incident. [DIT will establish a unique email address for the OSHA National Office EOC that will be used during a NEMP covered incident and will be accessible to designated personnel assigned the OSHA National Office EOC.]

For less significant incidents, the Assistant Secretary, or designee, may opt to respond from available office space utilizing existing telephone systems, computer equipment, and other office resources routinely available.

2. Equipment

A complete list of suggested equipment is located in Appendix L.

3. Physical Security

The OSHA National Office EOC location is physically secure and can be safely accessed. Controlled access to the building and parking garage is maintained by the existing guard force. The OSHA National Office EOC will be locked and secured during an incident when it is not occupied. Designated personnel such as the Assistant Secretary, Deputy Assistant Secretaries, and Directorate emergency contact and back-up personnel will be provided with keys.

4. Back-up facility

In the event that building evacuation is necessary, the OSHA National Office EOC will be relocated in accordance with the policies/procedures outlined in the DOL/OSHA Continuity of Operation Plan and Continuity of Government Procedures (contained in the DOL/COOP Information Management System). Relocation of the OSHA National Office EOC will be coordinated through the DOL-Office of Security and Emergency Management.

C. Critical Procedures

1. Activation

The NEMP will be activated when the Assistant Secretary, or designee, receives a request from a Regional Administrator or a Federal organization for support/assistance during a nationally significant incident that usually results in: an emergency declaration under the Stafford Act,

the activation of the Federal Response Plan, or a specific request from the DHS. The NEMP may also be activated at any other time the Assistant Secretary, or designee, deems appropriate. The Assistant Secretary, or designee, will identify the type and level of assistance being requested. The Assistant Secretary, or designee, will notify applicable Directorate emergency contacts and initiate operations in the OSHA National Office EOC. See Flow Chart for the flow of decisions and communications (See pages C-5 and C-6 of this Appendix).

When the Assistant Secretary, or designee, receives a request from a Regional Administrator or Federal organization involving an incident that does not meet OSHA's definition of a "nationally significant incident," as defined in Appendix B, the Assistant Secretary, or designee, will coordinate with the Regional Administrator and Director, DSTM to characterize the size and scale of the incident. In conjunction with these individuals, the Assistant Secretary, or designee, will determine if the NEMP will be activated. If activated, the Assistant Secretary, or designee, will notify the applicable Directorate contacts and designated State plan representative, through the Regional Administrator, if appropriate, and initiate operations in the OSHA National Office EOC. If not, Federal OSHA support will be coordinated under existing policies/procedures.

2. Emergency Contact List

The Emergency Contact List identifies the individual designated by each Directorate and Office who will be responsible for staffing the OSHA National Office EOC and coordinating requested Directorate/Office resources during a covered incident. The Emergency Contact List is located in Appendix E.

The Assistant Secretary, or designee, will use the Emergency Contact List to notify individual Directorates that the NEMP has been activated and that resources and personnel may be requested. Each emergency contact will have sufficient knowledge and authority to allocate appropriate Directorate resources when requested. Each emergency contact will act as the initial Directorate representative and will either report to the OSHA National Office EOC or begin coordinating the resources/personnel defined by the Assistant Secretary, or designee.

3. Transportation

To ensure that the personnel, PPE, sample equipment, samples, and other resources can be transported to the covered incident site and from there to an appropriate location (hotel, laboratory, etc.), the Director, DAP and the Director, DSTM have developed transportation procedures for selected personnel and equipment. Emergency procedures for arranging transportation of personnel, equipment, samples and other resources via normal transportation routes have been established and should be implemented by the Director, DAP. Procedures for arranging transportation of personnel, equipment, samples, and other resources by emergency transport (normal routes are not available) are outlined in the DSTM Emergency Transportation Plan (Appendix H).

4. Communication

Internal and public communication during an incident will be coordinated through the OSHA National Office EOC. Other than designated personnel, no one should provide information to the public or media that has not been cleared by the Office of Communications/Public Information Officer. The following sections supplement the procedures defined in Section X of the NEMP.

a. Crisis Communications Plan

The Crisis Communications Plan will be implemented in conjunction with this NEMP. The objective of the Crisis Communications Plan is to coordinate the information distributed to the public and ensure that information is both consistently expressed and timely in nature. The plan includes a mechanism for coordinating information within the Joint Information Command (JIC) and with the other Federal, State, and local organizations involved in the incident. Public communication will be coordinated by OC, in accordance with the Crisis Communications Plan. The Crisis Communications Plan is located in Appendix F.

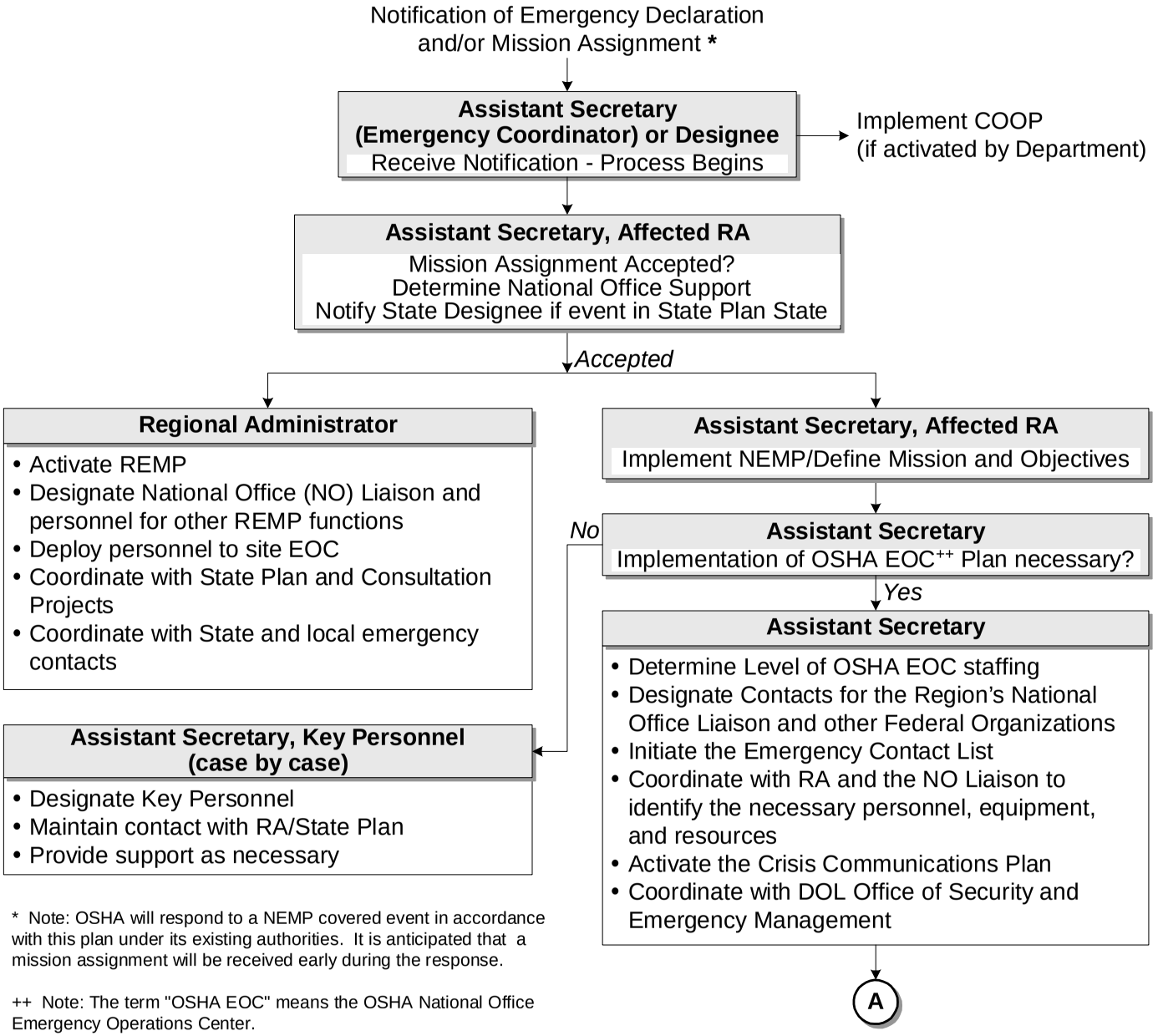
b. Priority Communication System

OSHA personnel assigned response roles or functions under the NEMP will be provided priority telephone access through the Government Emergency Telephone Service (GETS). OSHA personnel will be provided instructions for accessing the system and will be assigned a Personal Identification Number. The system provides access using existing telephone lines; if these are inoperable then the GETS system is also inoperable. If telephone lines are inoperable, emergency communication equipment must be used until telephone lines are restored. Emergency communication equipment may include cellular and satellite equipment, which will be available to National Office personnel in the EOC or through the Assistant Secretary, or designee, as outlined in Section B.2 of this Appendix.

5. Emergency Procurement

Emergency Procurement will be coordinated through the Director, DAP, or designee, in accordance with established emergency procedures.

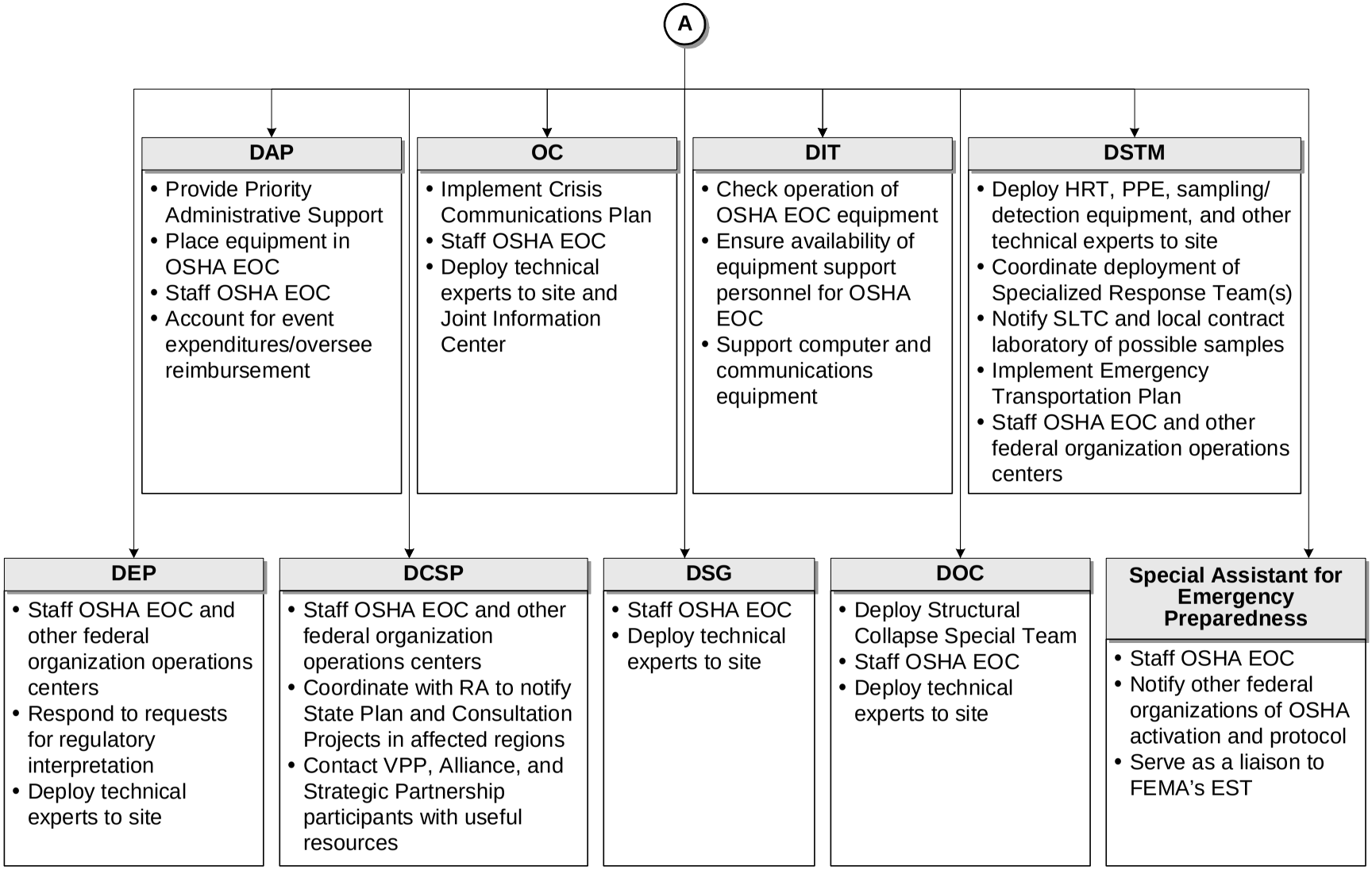
Flow Chart: Decisions, Information, and Actions – Initial 24 Hours of NEMP Operations



* Note: OSHA will respond to a NEMP covered event in accordance with this plan under its existing authorities. It is anticipated that a mission assignment will be received early during the response.

++ Note: The term "OSHA EOC" means the OSHA National Office Emergency Operations Center.

Flow Chart: Decisions, Information, and Actions – Initial 24 Hours of NEMP Operations



Appendix D — Model Outline for a Regional Emergency Plan

Background

The REMP was proposed by Region II in the wake of the World Trade Center (WTC) response and recovery operations. The development and implementation of a REMP was recommended as a means for strengthening Regional/Area response planning, organization, and management during future incidents of similar size and scale. If properly implemented, the concepts of the REMP will support and complement the Incident Command System (ICS) command structure. Every Region must develop a REMP.

REMP Structure

The model REMP (under "**Model Outline**" below) includes the elements identified by Region II as critical for a successful command and control structure necessary for managing and responding to significant incidents. Regions are encouraged to create a committee to develop and update the REMP. Each REMP must include:

1. The scope and type of incidents to which the Regional Office will respond when the Region activates the REMP.
2. The Regional Office's response resources (technical expertise and equipment), including those of State plan and Consultation Projects that have agreed to share State resources.
3. The Regional Office's critical coordination efforts with the other regional offices of Federal response agencies (e.g., regional FEMA, regional EPA, Regional Response Teams (RRT), local law enforcement, etc.).
4. The way that the Regional Office and each State plan anticipate supporting one another during a covered incident. To achieve this, the REMP should include the predetermined protocol for integration and coordination with each State plan during REMP activation and a NEMP threshold level response occurring in that State, including: lead agency determination, a description of how site health and safety will be addressed in each State plan State, available resources, expectations for mutual support during an incident in the State or elsewhere in the Region, and a plan for outreach to State and local government entities.
    a. In States operating State plans for public employees only, the State role should be modified appropriately to reflect the State's limited jurisdiction.
5. The critical actions and concerns to be addressed by the Region during the first few days of the response.
6. The staffing nomenclature and the command structure identified in the Model Outline, below.

The REMP is designed for large-scale catastrophic incidents, primarily terrorist acts, but can be activated by the Regional or local office in response to smaller incidents. For example, Regions will use the REMP during nationally significant incidents, where OSHA's emergency phase activities would include emergency technical assistance, guidance, and consultation. During local incidents, OSHA's site activities will include technical assistance, guidance, and consultation during the emergency phase. However, OSHA's traditional enforcement activities can be simultaneously activated during local incidents. It is important that during such an incident the Incident Commander is notified of OSHA's dual role. OSHA's policy regarding

response to emergencies that are not NEMP covered incidents has not changed; see CPL 02-00-094.

Because local areas may have different approaches to incident command, Regions are encouraged to coordinate with and to share their REMP with other Federal, State, and local response agencies such as: regional FEMA offices, regional EPA offices, RRTs, State and local emergency management agencies, State and local law enforcement agencies, and State and local emergency planning committees. In a State plan State, these activities should be coordinated through the State plan designee. Coordination with these response agencies during planning and training activities will ensure that OSHA personnel become familiar with the local incident command structure and the likely responders, and will be able to identify proactively any special needs for response. For example, coordination with State and local law enforcement agencies will ensure that these agencies are familiar with OSHA's role during an incident and will honor OSHA credentials, allowing OSHA personnel site access. In addition, coordination will ensure that Regions are aware of any additional provisions necessary for OSHA personnel to gain access to a site. Proactive coordination with State and local response agencies will also facilitate OSHA's acceptance into the hierarchy of the local incident command structure.

Federal OSHA personnel will complete FEMA's Basic Incident Command Structure (ICS) training program to ensure their familiarity with ICS concepts and nomenclature. This training will assist OSHA response personnel to integrate into the site ICS established to meet the requirements of HAZWOPER.

It is not the intention of the NEMP to require each Region to be fully capable of responding autonomously to all major categories of possible terrorist attacks, especially those involving ionizing radiation or biological agents. Current policy intends that each Region have the capability to respond with personnel that are Level B capable, led by an OSHA On-site Leader/Coordinator, to fully assess the situation and decide if additional assistance is needed from the HRT or a Specialized Response Team. As more OSHA personnel become Level B capable and receive appropriate NEMP training, which covers biological agents and ionizing radiation, it is anticipated that most Regions will have adequate response capabilities in all areas.

Model Outline

The REMP was developed using the "lessons learned" from OSHA's WTC response operations. This outline is a framework for organizing Regional staff, providing on-going technical assistance, and coordinating safety and health assistance during a sustained response. All REMPs will address: administrative functions; internal safety and health; safety and health assessment; site safety monitoring; industrial hygiene monitoring; site training; distribution, fit testing, and decontamination of personal protective equipment; and coordination with the National Office, the site Emergency Operations Center and incident command, other agencies, and stakeholders. The REMP outline also features critical timelines identifying the actions that should be taken as an emergency unfolds [See Appendix M of the NEMP for examples].

The outline identifies concepts and staffing functions that were employed effectively during OSHA's WTC response. The concepts/functional areas included are patterned to integrate with the ICS and can be expanded or collapsed similarly, to meet the needs of the incident.

To ensure interoperability within OSHA, each Region will adopt the REMP staffing nomenclature and command structure outlined in the model below. This will ensure OSHA personnel can integrate into a site command structure based on their assigned functions when the site nomenclature is unique.

The Model Outline identifies staffing *functions*, **not** individual people, which must be addressed during each response. One individual and several assistants may be needed to manage each staffing function during a large-scale incident whereas one individual may be able to manage several staffing functions during a smaller incident.

To allow for inherent differences among Regions, each Region shall have the flexibility to develop a REMP *implementation* plan that will meet the Region's own unique circumstances. REMPs must ensure that the necessary response resources (personnel and equipment) will be available and can be managed effectively, and provide for sufficient flexibility so that each response can be scaled according to the characteristics of an incident. Regions must reasonably anticipate scenarios for the REMP using the scope of the NEMP as the worst-case, large-scale incident. Using local experience, each Region has the flexibility to determine how and when the REMP would be used for smaller incidents. However, the basic nomenclature and structure must be the same. For successful implementation of the REMP, it is essential that its concepts and staffing functions be exercised and validated during incident responses that do not require NEMP activation.

Outline

I. Purpose

Identifies why the REMP was developed.

II. Scope:

OSHA has primary responsibility for worker safety and health during regionally and nationally significant incidents that are declared "emergencies" under section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121-5206 (the "Stafford Act") and result in the activation of the Federal Response Plan. Within 24 hours, OSHA personnel with Self-Contained Breathing Apparatus (SCBA) capabilities will respond to such an incident or be on site at the scene of the incident (refer to NEMP Appendix N for medical clearance requirements for SCBA use). Initially, OSHA will concentrate Agency resources on ensuring that this level of response is available for the priority cities chosen to receive funding through the DHS Office of Domestic Preparedness' Urban Area Security Initiative. As additional personnel are trained and equipment is purchased, OSHA's response capabilities will expand and the Agency will work toward providing the same level of support (within 24 hours, SCBA capable) during incidents in other regional cities and major population centers.

For all incidents except those involving ionizing radiation and biological agents, Regions will be capable of responding with Level B protection. OSHA personnel will not use SCBAs to perform rescue, in environments that may be Immediately Dangerous to Life and Health (IDLH) or in environments that have not been adequately characterized. Any decision to use Level B protection must include the approval of the Regional Administrator. The SCBA use policy identified here is consistent with CPL 02-02-059 - *Inspection Procedures for the Hazardous Waste Operations and Emergency Response Standard, 29 CFR 1910.120 and 1926.65, Paragraph (q): Emergency Response to Hazardous Substances,* Section XVI *Protection of OSHA Personnel*. OSHA's current policy is to have personnel deployed to ionizing radiation and biological agent incidents go to the site's Joint Operation Center (JOC), Federal Radiological Monitoring and Assessment Center (FRMAC), or other appropriate operations center and request

assistance from the HRT and Specialized Response Teams until OSHA's capabilities in these areas are strengthened.

III. Primary Roles for REMP Activation

A. Regional Administrator

1. Role and Responsibilities

B. OSHA On-site Leader/Coordinator (see Role of OSHA On-site Leader/Coordinator)

1. Role and Responsibilities
2. Key Qualifications

C. National Office Liaison

1. Role and Responsibilities
2. Key Qualifications

IV. Staffing Functions (necessary for every REMP)

(***NOTE: these functions may not be applicable or may be combined for smaller incidents during which multiple functions could be performed by one person***)

A. Logistics

1. Administrative
    a. OSHA Command Post and/or Operations Center
    b. Transportation Plan (local and long distance)
    c. Lodging for OSHA Response Personnel
    d. Communications
    e. Scheduling Response Personnel
    f. Orientation to Locality - maps, mass transit
2. Technical Equipment and Supplies
    a. Technical Equipment
3. Provision for Multiple Incidents

B. OSHA's Representative for the site Emergency Operations Center (EOC)

1. Leadership for Worker Health and Safety within Site EOC
2. Communication between site EOC and Regional OSHA Command Post
3. Representation at Site Meetings

C. Public Information and Communication

1. Crisis Communications Plan
2. Coordination with National Office's Crises Communications Plan

D. Safety Risk Assessment and Data Management

1. OSHA Compliance Safety and Health Officers and their deployed assets

2. Safety Monitoring (site walk-through)
3. Data Interpretation and Recommendations
4. Data Management

E. Health Risk Assessment and Data Management

1. OSHA Compliance Safety and Health Officers and their deployed assets
2. Sampling Equipment (direct reading and personal air sampling devices - available equipment and considerations for obtaining additional necessary equipment once on site)
3. Sampling Strategy – general approach, to be refined during actual incident (full spectrum, critical operations, etc.)
4. Data Interpretation and Recommendations
5. Sample Analysis
    a. On-site capabilities
    b. Local Laboratories
6. Data Management
7. Employee notification of monitoring results

F. Personal Protective Equipment (including Respiratory Protection)

1. PPE Program
2. PPE Availability and Supply
3. Respiratory Protection Fit –Testing
4. Identify potential contractor assistance

G. Employer/Employee Liaison

H. Document Management

1. Document organization, standardization, and archiving
2. Freedom of Information Act Process

I. Internal Safety and Health Coordinator

1. Safety and Health Requirements for OSHA Response Personnel
    a. Training
        (1) Site Orientation (should address relevant site-specific information such as:
            (i) Site Health and Safety Hazards and Exposure Controls
            (ii) Site Chain of Command
            (iii) Site Processes and Activities)
        (2) Pre and Post Shift Briefings
        (3) Other
    b. PPE
    c. Monitoring
    d. Decontamination

2. Wellness Training and information
3. Mental Health Support and Critical Incident Stress Debriefing

J. Point of Contact (POC) for National Office Specialized Response Team

V. State Plan State Coordination

A. For each State plan, establish a process for a coordinated response for all aspects of the REMP.

B. For State plans for public employees only, the role of the State will differ from that in a complete State plan State and should reflect the limited jurisdiction of the State and the on-going Federal responsibility for private sector coverage.

C. For each State plan, describe the predetermined protocol for integration and coordination during a covered incident occurring in that State or elsewhere in the Region, and mutual expectations for support, including:

1. Emergency contact and REMP activation procedures;

2. Timely notification of State plan officials when Federal OSHA, in its Federal emergency preparedness coordination role, intends to be or is present in the State in an official capacity, including information about the Agency's activities and objectives;

3. Delineation of Federal OSHA and State plan mutual responsibilities in response to a covered incident in the State:

a. Identify whether State is:

(1) Able and willing to provide lead occupational safety and health response independently, with Federal OSHA providing only liaison at the national level;

(2) Able and willing to provide lead occupational safety and health response with Federal OSHA assistance; or

(3) Requesting that Federal OSHA assume lead response with State assistance.

b. Specifically address expected assistance roles including:

(1) Safety monitoring;

(2) Health monitoring;

(3) Respirator distribution and fit testing;

(4) HASP oversight and maintenance.

c. Delineate responsibility for coverage of private sector, and State and local government entities.

d. Address the limitations of coverage by State plans with jurisdiction only over public sector employee. Federal OSHA will likely retain the primary response role.

4. A description of mutual expectations for support, including:

a. Available resources, such as personnel and equipment, that will be allocated by the Regional Office and the State plan during a covered incident; and

b. Any agreements to provide support during covered incidents in other States and/or Regions.

5. A strategy for coordinating outreach

6. A strategy for coordinating the provision of State plan technical experts and equipment to Federal States during a response to a covered incident outside the State plan.

VI. Consultation Projects

A. Identification/Coordination of available technical expertise

B. Identification/Coordination of available equipment and other resources

VII. Activation

A. The REMP must be activated when the NEMP is activated

B. The Regional Administrator, or designee, may invoke the REMP for local incidents

VIII. Coordination with and Outreach to other government organizations, volunteers, and outside technical assistance (e.g., VPP, Alliances, and Partnership participants; unions; and contractors)

A. Regional FEMA

B. Regional EPA

C. State and Local Emergency Management Organizations

1. State Emergency Management Agencies
2. Local Emergency Management Agencies

D. State and Local Emergency Response Organizations

1. Fire Fighters
2. Law Enforcement
3. Emergency Medical Providers
4. Hospitals

E. RRT – participation in area exercises

F. State Emergency Response Committee

G. Local Emergency Planning Committee

(Note: In a State plan State, all activities should be coordinated through the State plan agency.)

IX. Response Resources

A. Regional Technical Experts (list, including State plan and Consultation Project personnel, if appropriate - provide short description and include completed list as an attachment or tab)

B. Equipment and Supplies (list, including State plan and Consultation Project resources, if appropriate - provide short description and include completed list as an attachment or tab)

1. Industrial Hygiene Equipment and Forms (e.g., sampling equipment, tape measures, OSHA sample forms, etc.,)
2. PPE
3. Communication Equipment (cellular phones, walkie-talkies, etc.)
4. Office Equipment and Supplies (e.g., portable fax/copy machine, OSHA forms, paper/log books, tape recorders, etc.,)
5. Computer Equipment (laptops, personal digital assistants, etc.)
6. Transportation Equipment (vehicles and other)
7. Cameras/Video Camera
8. Emergency Equipment
    a. Generators
    b. Lighting

C. Provision for Multiple Incidents

D. Contractor Assistance (as deployed assets)

X. Response Phone Tree (short description about how established/updated; List included in an Appendix or Tab)

XI. Response Organization and Communication Flow Chart (abbreviated flow chart, brief description; complete flow chart in an Appendix or Tab)

XII. Training

A. All OSHA personnel assigned a role or function related to implementing the REMP will complete OTI 345: Basic Incident Command System [Emergency Management Institute (FEMA) Independent Study Course IS-195] and the ISC Level 200 course.

B. Regional Administrators and their designees will complete ICS for Executives (Training Module 17 of the ICS training program).

C. Regional OSHA On-site Leaders/Coordinators will participate in the initial training identified above and in OSHA's Risk Management training program, which includes OTI 3600: OSHA Technical Assistance for Emergencies (Course A) and OTI 3610: OSHA On-site Leaders/Coordinators Course (Course B), currently under development.

XIII. Response Checklist - [The Response Checklist identifies the critical tasks for the functional area Coordinators. Example checklists that can be modified to fit the needs of

each Region are located in Appendix M of the NEMP. Each checklist identifies the recommended tasks that should be completed by the identified Coordinator immediately, during the first 8 hours, during the first 24 hours, and during the first 48 hours of the incident.]

A. Internal Health and Safety Coordinator Response Checklist

B. National Office Liaison Response Checklist

C. Logistics Coordinator Response Checklist

D. OSHA's representative for the site Emergency Operations Center Coordinator Response Checklist (Support to other federal agency EOC)

E. Public Information Officer Response Checklist

F. Safety Risk Assessment/Monitoring Coordinator Response Checklist

G. Health Risk Assessment/Monitoring Coordinator Response Checklist

H. Sampling Coordinator Response Checklist

I. PPE Coordinator Response Checklist

J. Employer/Employee Liaison Response Checklist

K. Documentation Management Response Checklists (for the Health Data Manager, Database Coordinator, and the Data Entry Specialist)

XIV. Responsibility for Plan Review and Update

A. Each time the REMP is implemented, a critique of the operations will be conducted and "lessons learned" will be summarized. Minimally, the REMP will be reviewed and revised with consideration for these "lessons learned" annually.

Illustration of the ICS Concept and Example Structures for Small and Large Scale Responses

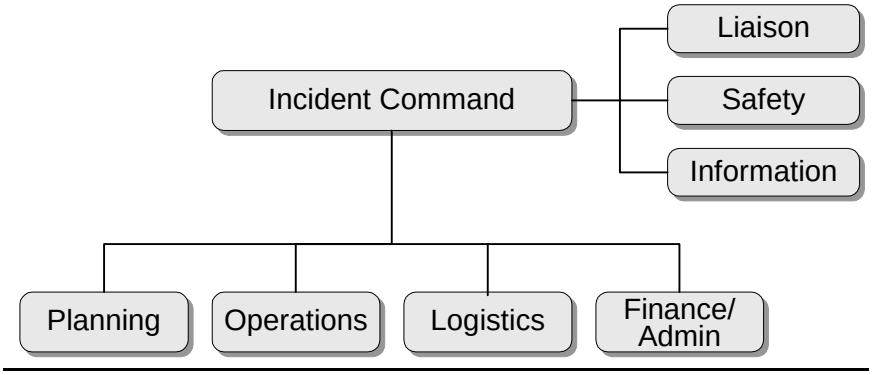
The following diagrams illustrate the ICS structure and how the roles described in the REMP may fit into that structure. The first diagram depicts a typical ICS structure. The second diagram depicts a REMP structure for a smaller scale incident. The last diagram depicts a REMP structure for a large-scale incident, where the NEMP is also activated.

The REMP structure could integrate into the typical ICS structure in a variety of ways depending on the nature and duration of the incident, and the role OSHA would assume. One example would be where OSHA personnel are asked to be an assistant to the Safety Officer. The Safety Officer (see definition in NEMP Appendix B) in an ICS has responsibility for both public safety and responder safety. OSHA should not, as a rule, be the Safety Officer. OSHA could take a lead role in the coordination of safety and health for all workers and be an assistant to the Safety Officer, who reports directly to the site Incident Commander. OSHA could also fit into the ICS structure under the Operations Section. And, OSHA could be part of a Unified Command when it has been decided that a Unified Command will be used during an incident.

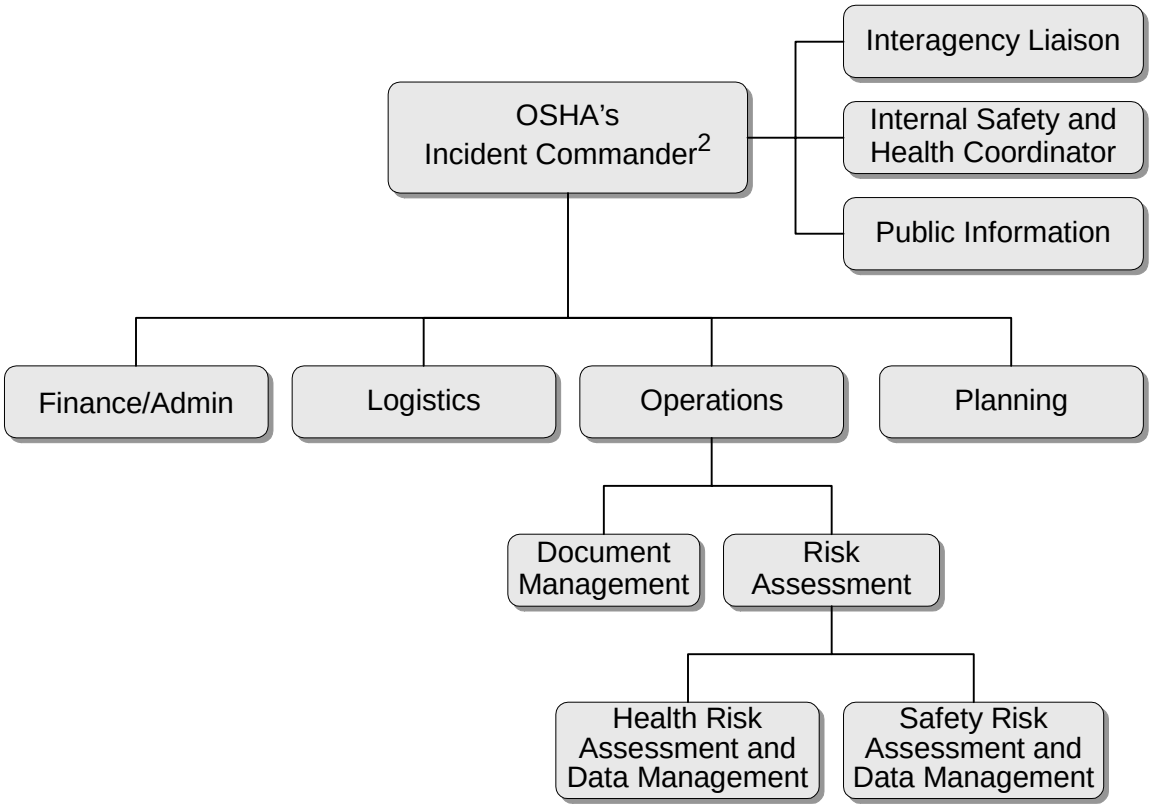
OSHA's internal REMP structure, nomenclature, and staffing functions would be transparent to the others in the site ICS structure. The person that would typically report to the Safety Officer or Section Chief would be OSHA's Incident Commander. The OSHA person holding the title "OSHA Incident Commander" would change as the complexity of the incident changed. The term "Incident Commander" has a unique meaning within the ICS. Regional REMPs will include

the term “OSHA’s Incident Commander,” but the use of the term should be limited to OSHA personnel only. This is necessary to prevent confusion at an incident where there is only one Incident Commander.

Basic Incident Command System Structure



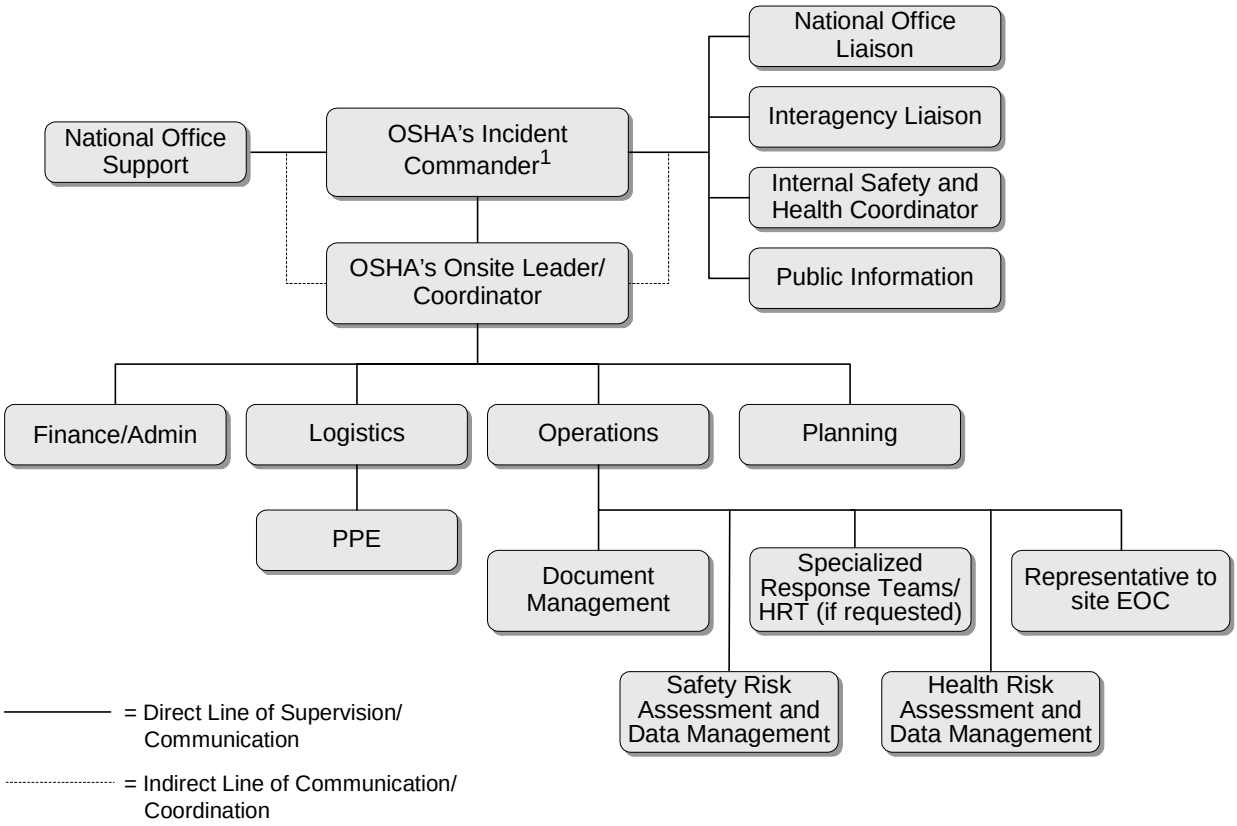
Example Structure for a Smaller Scale, Regional Response[1]



[1]Each REMP staffing function (not individual) is represented in this illustration. The size and scope of these functions will vary directly with the size and scope of the incident being managed. During a Smaller Scale Regional Response, one individual may perform several functions.

[2]The OSHA Incident Commander would be the Regional Administrator or his/her designee. The Regional Administrator would designate the first assigned CSHO at the incident, the Assistant Area Director, the Area Director, or the On-site Leader/Coordinator, depending on the size, scope, and complexity of the incident.

Example Structure for a Large Scale, National Response



[1]The OSHA Incident Commander would be the Regional Administrator or his/her designee. The Regional Administrator would designate the first assigned CSHO at the incident, the Assistant Area Director, the Area Director, or the On-site Leader/Coordinator, depending on the size, scope, and complexity of the incident.

Role of the OSHA On-site Leader/Coordinator

During activation of the NEMP and REMP, and within a functioning ICS (see Figures above) at such an incident, the OSHA On-site Leader/Coordinator could occupy the role of Assistant Safety Officer. This arrangement permits the Incident Commander to appoint the Safety Officer, a line officer, and allows OSHA to provide technical information to the site Incident Commander relating to worker safety and health. This also helps maintain the employer's ultimate responsibility for the safety of their employees, rather than OSHA personnel assuming this responsibility and its potential liability.

The OSHA On-site Leader/Coordinator will provide consultative advice and technical assistance to the site Incident Commander on all worker safety and health issues related to the incident. Working within the ICS, the OSHA On-site Leader/Coordinator will help promote worker safety and health on site, and will offer the site Incident Commander suggestions about the relative risk/benefit for the overall incident objectives and strategy.

In addition to the prerequisite training listed below, it is suggested that the OSHA On-site Leader/Coordinator be an OSHA employee at the GS-13 level or above (i.e., CAS, AAD, AD, ARA, RO technical staff, etc.). The OSHA On-site Leader/Coordinator will control the activities of OSHA's deployed assets including the Specialized Response Teams (although they might be a member of a team, they would be operating in a different capacity if they were called to an incident as an OSHA On-site Leader/Coordinator), OSHA technical experts, other OSHA personnel, and OSHA-contracted personnel. The OSHA On-site Leader/Coordinator does not need to be, and often will not be, the ultimate technical authority within OSHA on unique or novel hazards (i.e., structural collapse, WMD/CBRNE, or complex hazardous materials incidents). The OSHA On-site Leader/Coordinator will have sufficient training and experience to predict, identify, and recognize such risks and know where to obtain advice. The advice might come from within the agency (i.e., HRT, DOC-Engineering Services, or the specialized response teams) or from an outside source.

It is not expected, nor is it desirable or even possible, that OSHA will fill the role of incident Safety Officer at routine incidents around the country. First response organizations are staffed and trained to perform this function during reasonably anticipated emergencies; they also have certain legal obligations to do so. OSHA may be called on to provide assistance during nationally significant incidents, as well as some regionally significant incidents that overwhelm the capabilities of local responders. These may include natural disasters. The initial OSHA staff responding to an incident may be asked by the Incident Commander to assist as the safety officer. These requests would be passed up the OSHA chain of command so that a suitably trained OSHA On-site Leader/Coordinator can be sent to the site as soon as possible. The initial OSHA staff (i.e., CSHO or IH) may offer advice temporarily, consistent with their knowledge and limitations, but would not be expected to function as an OSHA On-site Leader/Coordinator.

Prerequisites for OSHA On-site Leaders/Coordinators:

- Medical clearance to wear an SCBA (suggested but not required)
- OTI 3600: OSHA Technical Assistance for Emergencies
- OTI 3610: OSHA's On-site Leader/Coordinator Course
- OTI 222: Respiratory Protection OR equivalent
- OTI 331: Hazardous Waste Site Inspections OR OTI 335: Emergency Response to Hazardous Substance Release OR OTI 312: Hazardous Waste Site Inspection and Emergency Response for Construction OR equivalent experience

- OTI 345: Basic Incident Command System (Emergency Management Institute (FEMA) Independent Study Course IS-195)
- OTI 346: Emergency Response to Terrorism (National Fire Academy (FEMA) Self-Study ERT: SS Q534)
- Strong familiarity with their Regional Emergency Response Plan

REMP Definitions

Functions (or Staffing Functions): [ICS]

Mission Assignment – Example for Region II's Work with the EPA at the WTC:

Date:	November 12, 2002
Project Name:	Health and Safety Technical Assistance for the World Trade Center (WTC) Dust Cleaning Program
Institution Name and Address:	Occupational Safety and Health Administration
Lead Project Officer:	contact name
Project Period:	90-days from the date of award
Amount Requesting:	Total Cost

1. Purpose

OSHA's role will be to assure that workers cleaning residences and residential common spaces are properly monitored and protected from exposure to safety and health hazards.

2. Authority

FEMA and EPA have entered into this Agreement pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act ("Stafford Act"), 42 U.S.C. §§5121 et seq.; Executive Order 12148, as amended, and 44 CFR Part 206 to address the public's concern that dust and particulates dispersed into their homes by the WTC collapse may pose a public health and safety threat.

3. Scope of Work

OSHA staff will provide occupational health and safety support to EPA's residential cleaning program. In this regard, OSHA staff will throughout the course of this project perform oversight of these cleaning operations and work closely with EPA to monitor the progress of such operations. OSHA's oversight may include random records verification and site inspections of various locations and operations to ensure compliance with the Occupational Safety and Health Act and any and all applicable OSHA standards. Specifically, OSHA will provide compliance officers to conduct full-shift personal sampling to identify and evaluate health hazards, to conduct site safety inspections to identify and evaluate any safety hazards, to oversee work practices, to evaluate air monitoring health data submitted to OSHA, to ensure workers' rights, and to assure the safety and health of contractors or other potentially exposed workers.

4. Assuring Worker Safety and Health

For site inspections conducted under this Statement of Work, Compliance Officers (CSHOs) should refer to the OSHA Field Inspection Reference Manual (FIRM) - Compliance Directive CPL 2.103 (9/26/94) - which is a reference document for identifying inspection duty

responsibilities and which provides field information and guidance. In addition to the FIRM, CSHOs assigned to this project shall also be advised to apply the following sequential procedures, unless the condition poses an imminent danger to worker safety and health:

a.) Any conditions in violation of the OSH Act or of OSHA standards, rules, or regulations that are discovered or disclosed during the course of these oversight/inspection activities shall immediately be brought to the attention of the subject employers (i.e., cleanup and monitoring contractor(s) or controlling contractor(s)), the designated EPA representative who is in charge of the site, and the employees' designated representatives (if any), in an attempt to gain immediate compliance.

b.) For contractor(s) who abate hazards/violations found during these inspections within 24-hours of being notified of the condition, and thereby prevent worker injury, illness, and death, OSHA shall provide abatement incentives as described in OSHA CPL 2.112 - Quick-Fix Program. When contractor(s) fail to abate a hazard in a timely manner as described above, OSHA will not apply incentives described in the Quick-Fix program.

c.) Should any circumstances arise where OSHA has notified the contractor(s) repeatedly of apparent violations and the contractor repeatedly has failed to take reasonable, good-faith steps to abate these hazardous conditions, leaving workers exposed to serious safety and health hazards, OSHA will make a recommendation to the appropriate EPA designated representative to take whatever appropriate action is necessary to ensure prompt and complete compliance with the OSH Act. The designated OSHA and EPA Regional officials who are monitoring the progress of this project also shall be notified immediately.

5. Budget

To accomplish this OSHA health and safety support and oversight to the EPA residential cleaning program, OSHA will need the following resources:

OSHA Supervisor GS-13

Is responsible for assigning and prioritizing compliance officer field work, review field compliance and oversight work; to review OSHA and other Residential Cleaning project data as necessary; establishing and maintaining any necessary databases, and for working with assigned team to compile and complete any necessary status reports. In addition, is responsible for verbally notifying (see 4. Reporting Requirements) EPA if a situation occurs that would impact the schedule and flow of work required under the Statement of Work for both the WTC Indoor Air Monitoring and Dust Cleaning Program Contracts.

OSHA Compliance Officers GS-12 (3)

Are responsible for conducting onsite safety and health evaluations in accordance with the OSHA FIRM and FOM; to work closely with the Supervisor; to perform any other OSHA duties related to the EPA Residential Cleanup Program as assigned or as directed by the OSHA Supervisor.

OSHA Salt Lake City Laboratory Analyst

Are required to input, handle, maintain chain of custody, and analyze and report out OSHA samples in accordance with OSHA's Technical Manual, Chemical Information File, and established OSHA analytical methods.

Transportation/Travel (cost/trip/# of trips for CSHO travel)	$ cost
Lodging and per diem ($ cost/CSHO/wk for # of weeks)	$ cost
Supplies & Equipment (total see below for breakout)	$ cost

All necessary health air-sampling pumps and calibration devices, sampling hoses, sampling media, real-time aerosol monitoring devices, sound level meters and dosimeters, digital cameras, computer supplies, miscellaneous supplies and equipment.

4 - Sets of Medium Flow air sampling pumps	$ cost
3 - real-time aerosol monitors	$ cost
5 - 8 - noise dosimeters and a calibration device for the same	$ cost
4 - Simple SLM - A weighted Slow response	$ cost
4 boxes AA - MCEF - 37mm sampling cassettes	$ cost
12 - boxes 25mm open cowl asbestos sampling cassettes	$ cost
150 - silica sampling cassettes - pre-weighed	$ cost
100 - mercury sampling tubes	$ cost
15 - silica sampling cyclones	$ cost
3 - boxes tygon tubing 1/4" ID 3/8" OD	$ cost
2 - boxes tygon tubing 1/8" ID	$ cost
15 - adjustable belts for personal pumps	$ cost
50 - Nylon filter cassette hose adapter	$ cost
10 - tube holders for HG tubes - 70mm	$ cost
Field Support Overtime (# of hrs @ $ cost/hr)	$ cost
Analytical Laboratory Support Overtime (# of hrs @ $ cost/hr)	$ cost
Sample Shipping Costs	$ cost
Total OSHA Health and Safety Support	$ total cost

6. Reporting Requirements

The recipient shall furnish a copy of the combined monthly technical and financial progress report stating that progress made, including the percentage of the project completed, and a description of the work accomplished to support the costs. Specific discussion shall include difficulties encountered during the reporting period, and anticipated activity with a schedule for the subsequent reporting period.

The report shall be submitted to the following e-mail addressees within 30 calendar days after the end of the applicable reporting period:

EPA contacts
FEMA contacts
Other appropriate contacts
OSHA contacts (cc'ed)

OSHA will furnish a final report to the above listed individuals within 30 days of the completion of this Interagency Agreement documenting all technical work performed during the course of this project. This report will detail and memorialize the work that OSHA completed during the period of this agreement.

7. Terms and Conditions

OSHA Shall:

a.) Ensure that this Agreement is carried out in accordance with the approved Scope of Work, established protocols, costs and time limitations, except where WPA and OSHA agree otherwise. Apply proper financial principles, policies, regulations and management controls to ensure full accountability for the expenditure of Disaster Relief Funds.

b.) Track and monitor obligations and disbursements.

c.) Track accountable property that will revert to FEMA on completion of the project. When FEMA pays for the purchase of equipment under an Interagency Agreement or Mission Assignment, the equipment normally belongs to FEMA and must be fully accounted for after the project is completed.

d.) Submit bills quarterly. OSHA will provide billing information to EPA which will include expended costs by major budget object classes (e.g., payroll, travel, contracts, IAG costs, equipment purchases, etc.) And will maintain supporting documentation for these expenditures in accordance with FEMA requirements.

e.) Pursuant to 44 C.F.R. 206.8, regular labor for permanent Federal agency personnel (e.g. personnel whose Federal agency has received an appropriation from Congress or employees who backfill for employees working on the project that is the subject of this Agreement) and overhead costs are not eligible for reimbursement, except when the costs incurred would normally be paid from a trust, revolving, or other fund. For the latter exception, OSHA's Financial Manager must submit a written certification that the overhead costs and costs for regular labor are paid from a trust, revolving, or other fund. If regular time is allowed, it should be identified separately from overtime labor on the invoice by description.

f.) Submit final bill(s) to EPA no later than 60 days after the expiration of this Agreement. If OSHA is unable to provide a final billing 60 days after the conclusion of this project, OSHA will notify EPA of estimated future billing and the anticipated time of the final billing.

EPA shall:

a.) EPA shall transfer reimbursement funds to OSHA using the Treasury IPAC system.
OSHA Financial Contact: name phone number
EPA Financial Contact: name phone number/email

OSHA ALC: reference number
EPA ALC: reference number

OSHA Document Number: reference number
EPA Document Number: reference number

b.) EPA shall provide OSHA with the following equipment:

1) 12 SKC Pumps - SKC224-PCXR8

2) 3 SKC Master chargers (enough for 12 pumps)

3) 2 Gilian Gilobrators (bubble and base plus charger)

4) 4 Sony Mavica MVC-CD400 digital cameras, chargers, cases & accessories

All equipment is to be returned to EPA at the conclusion of this IAG in working condition.

Appendix E — Emergency Contact List

[Reserved under development]

Appendix F — Crisis Communications Plan

Occupational Safety and Health Administration
Crisis Communication Plan Manual

October 2003

Contents

Introduction

This manual details procedures for public affairs professionals and other officials in OSHA and DOL to follow when responding to communications demands as part of a national emergency response or other homeland security situation.

OSHA is a participant in the National Response Plan for addressing emergency preparedness. The Agency's role is to provide advice, assistance, and expertise in achieving the agency's goal of protecting workers and saving lives. Although many other public and private sector organizations may participate in an emergency response, OSHA is the authority on workplace safety and health.

The objective of the crisis communications plan is to make sure that necessary information about job safety and health is shared as quickly as possible with workers, employers, safety and health professionals, and members of the general public.

During a crisis, OSHA will assume a leadership role in communicating clearly to affected groups what they want to know, need to know, and must know to understand critical events and the government's response to those events. To protect the safety and health of workers involved, OSHA will deliver a clear, credible, and reliable message regarding worker health and safety protection.

Because various segments of society may be directly or indirectly affected and in need of critical information during a crisis, OSHA will take the following actions:

- Proactively take the agency's message to the media, stakeholders, interest groups, and the public to communicate actions, priorities, outcomes, and results.
- Aggressively refute rumors, inaccuracies, innuendo, and unsubstantiated claims regarding worker protection.
- Assertively ensure that workers, employers, and the American public are aware of the agency's actions and its role in an emergency response.
- Cooperatively work within a Joint Information Center, if one is established, to disseminate information on OSHA's role in ensuring the safety and health of emergency response workers.

Overview

Generally, the media are anxious to receive and use information from a reliable government source early in a crisis when facts and details are difficult to obtain. OSHA's Office of Communications (OC) provides leadership in communicating the agency's actions and responses during a crisis. These efforts must be thoroughly integrated with the crisis management activities of other offices within the agency and the Department, including the Department of Labor's Office of Public Affairs (DOL/OPA). The agency will accomplish these goals by activating a Crisis Communications Plan implemented by a Crisis Communications Team.

If the crisis involves other agencies, OSHA's Office of Communications will coordinate its activities with the public affairs offices of these agencies and of DOL/OPA to the best extent possible.

During large scale responses involving multiple federal agencies, a Joint Information Center or (JIC) will be established. The formation of a JIC is currently required by the Federal Response Plan (FRP). The function of the JIC is the coordination of governmental responses to the media on important questions of safety, security, public and worker risk and to make federal recommendations when queried. When a JIC is established, all communication with the media on the emergency response situation will be made through the JIC. As part of the Crisis Communication Plan, OC will make personnel available to function within the (JIC) to ensure that OSHA's message is presented clearly, is consistent with the overall message of the unified command, and that OSHA's interaction with the press serves the goals of the JIC including consistency and accuracy.

Communications Objectives

The primary objective of the Crisis Communications Plan is to disseminate critical safety and health information necessary for saving lives, safeguarding workers, protecting other affected parties and informing the public. It is important to establish the agency as quickly as possible as the clearinghouse for information about worker protection.

To accomplish its communications mission, OSHA must inspire trust, establish its integrity, and maintain credibility. To that end, the agency must take the following actions:

- Deliver prompt, clear, accurate information to workers, employers, stakeholders, the media and the public regarding the agency's emergency response.
- Manage information and messages; develop consistent core messages for the public and media; repeat core messages and critical information regularly through various outlets and with a range of communications products appropriate for the press, stakeholders, Congress, other governmental partners, and the public.
- Update messages regularly to ensure that the most current information is available.
- Develop situation-specific messages as necessary, taking into account whether the emergency situation is in a federal or State plan State and whether public or private sector employees are involved in the operation.
- Assess, update, and modify messages throughout the entire incident as necessary.
- Manage closure messages such as announcing the end of operations or investigative activities.
- Issue follow-up messages such as those involving anniversaries, reports, or public events.

It is critical for OSHA to make workers aware that the agency is onsite for their protection. OSHA should deliver messages directly to workers at the emergency operations site—not through intermediary sources. This is best done through personal contact, group meetings, and briefings. Working with recognized union authorities is another opportunity to deliver messages and information. When possible, appropriate OSHA literature should be made available to workers and their representatives. OSHA should keep the media and the public informed about what the agency is doing to protect workers at the emergency site.

Crisis Communications Plan

The OSHA Assistant Secretary will decide what constitutes a crisis in terms of an event that activates this plan. In executing the Crisis Communications Plan, OSHA's Office of Communications (or in some cases a regional office of Departmental OPA) will take the following actions:

- Release expeditiously to the media factual information relating to worker protection. The release should include a statement of regret concerning the impact of the crisis on workers and their families and the agency's message or position as it relates to the crisis. Internal organizational timeframes for releasing data and information should be established and met so all key players know ahead of time what is expected of them.
- Reinforce the agency's message as it relates to the crisis as often as possible, depending on the nature of the unfolding crisis, to keep affected parties fully informed.
- Be consistent with its facts, its message, and in the agency's position and policies in all communications.
- Consult regularly with the Department's Office of Public Affairs to coordinate media activities regionally and nationally.
- Work cooperatively with a Joint Information Center, should one be established.

Crisis Communications Team

A Crisis Communications Plan requires a full-team approach with an integrated agency response to ensure that effective, accurate, and helpful messages are delivered to address current circumstances while anticipating subsequent steps and contingencies. To that end, members of the Crisis Communications Team have specific duties and responsibilities:

Director, OSHA Office of Communications

- Has overall responsibility for the agency's Crisis Communications Plan.
- Advises the Assistant Secretary on all crisis communications matters and informs the Assistant Secretary of any potential problems, remedies, media options, and assessments as the crisis unfolds.
- Consults regularly with, and provides regular reports and updates on crisis communications to the Department's Office of Public Affairs, Office of Congressional and Intergovernmental Affairs, and other offices as appropriate.
- Coordinates with Regional Office(s) and OSHA's National Office Directorates.
- Provides oversight for the flow and content of all information about the crisis on the agency's website.
- Arranges for the Department's audiovisual division to monitor, tape, or maximize the acquisition of television news coverage to keep abreast of public perception.
- Activates, oversees, and coordinates the operation of the Crisis Communications Team.
- Names a backup team to replace team members who are unavailable and to provide relief during a long-term crisis.
- Assigns communications personnel to a JIC if one is established.
- Maintains names of team members and backup team members, including work, home, and mobile phone numbers.
- Updates the list of team members every six months.
- Briefs new team members on their assignments and responsibilities.
- Meets with team members at least annually to review their assignments.

- Meets with the team after any crisis communication activity to debrief team members and evaluate the activity to improve the plan and its execution.
- Conducts team practice exercises at least annually.

Senior Public Information Specialist

- Serves as the primary media contact, in coordination with DOL/OPA.
- Is responsible for the coordination and execution of the crisis communications strategy at the site of the emergency.
- Acts as a liaison in establishing and maintaining effective working relationships with other government agency public affairs officials.

If necessary, a second public information specialist will work with the senior public information specialist to provide backup and relief during the early stages of an event. The senior public information specialist should be a member of either the OSHA Office of Communications or a regional office of the Department's Office of Public Affairs.

Agency Liaison

- Is a program expert or official designated to provide onsite data coordination, status reports, and project updates of the emergency response for the Crisis Communications Team. Typically, the Agency Liaison would be the Regional Administrator or similar line official.
- Serves as a point of contact for Regional Offices and other government agencies.
- Works with the team to help coordinate information and activities.

National Office Liaison

- Is a member of the Command and Control group and ensures that the National Office and the entire Command and Control group receive timely updates concerning the emergency response. Reports to the Agency Liaison.
- Serves as the point of contact for National Office and other agencies in the Department.

Technical Expert

- Works closely with the members of the Crisis Communications Team in ensuring that the team receives technical information and updates needed to provide accurate and timely information regarding the emergency response. The technical expert has professional health and safety experience. Reports to the Agency Liaison.
- Serves as a point of contact for the National Office on technical matters as well as other agency and departmental officials involved in the response. The technical expert may vary depending on the nature and location of the event requiring the activation of the Crisis Communication Plan.
- Reviews releases for the media and other statements to the public for technical accuracy.

All team members should have a blanket travel authorization. They must also keep a "go kit" in their offices that includes the following items:

- Suitable clothing and personal items to last for a few days

- Hard hat
- Safety boots
- Suitable eye protection
- Hearing protection
- Appropriate respiratory protection
- Laptop computer
- Tape recorder
- Cell phone
- Phone and contact numbers
- Basic agency information kit.

All team members should be fit tested and trained in the use of personal protective equipment.

Communications Operations

The OSHA Director of Communications will establish an OSHA crisis communications center with needed information and resources:

- A pre-existing contact list in hard copy and online that includes national, regional, and trade press; key stakeholder groups; trade associations; and labor organizations. Center staff should keep these groups abreast of developments as time and circumstances permit.
- A staff comprising Crisis Communications Team members who will be accessible 24/7, depending on the nature of the crisis.
- The OSHA Director of Communications will work with the agency's Directorate of Administration and Management to activate all logistical support for the crisis communications center, including telephones, cell phones, faxes, and duplicating equipment.
- Appropriate spokespersons at the crisis site and in Washington, D.C., should be identified as quickly as possible and briefed on delivery of agency messages. In most circumstances, the highest-ranking OSHA official will provide on-the-record statements for the media, and communications staff will provide background or other information. The Director of the OSHA Office of Communications or the senior public information specialist onsite, however, will reserve the right to identify another appropriate spokesperson if professional considerations so dictate.
- Staff of the center will prepare talking points as quickly as possible either onsite or in Washington and update them regularly, making them available to appropriate parties to ensure consistency of message. The center and the OSHA Office of Communications will maintain copies of all talking points.
- Staff will maintain a log of all media, other government agency and stakeholder contacts.
- The staff will provide updates on issues and circumstances affecting the agency's communications objectives, daily or more frequently if needed, to the Director of Communications.

The OSHA Office of Communications will:

- Provide regular updates, assessments, and reports to the OSHA Assistant Secretary, the Department's Office of Public Affairs, and the Office of Congressional and Intergovernmental Affairs.
- Post immediately as much information as possible on the agency's website and ensure frequent updates.
- Work to ensure that the media, stakeholder groups, and the public are made aware that crisis communication information is available on the agency's website.
- The communications staff should disseminate important information through press briefings as early in the crisis as possible. Because of the confusion and communication difficulties that often accompany a crisis, the agency should not rely exclusively on issuance of news releases and website postings.
- The Crisis Communications Team should consider additional mechanisms for disseminating information when possible and appropriate, including individual press interviews, town hall meetings, special briefings, and other options. The team should also consider giving appropriate briefings at or near the emergency site as well as in Washington, D.C.
- OSHA program officials and experts will provide the Crisis Communications Team with data, facts, and other material needed to keep the public informed, such as scientific and technical information or interpretation, enforcement action, policy assessments, documents, memoranda, and statistics.
- If there are subject-matter areas or issues involved in the crisis that cannot be addressed by OSHA, the agency may wish to compile names and contact information in order to direct inquiries appropriately. Such referrals may be suggested by program experts in the agency. To avoid confusion or misinformation, individuals should be contacted in advance by the Crisis Communications Team to ensure they are available for press or other calls and that they are aware of OSHA's role in the situation.
- Media communications at the site of the situation will be provided by the Joint Information Center (JIC).

Timeframes for Action and Plan Execution

To support the agency's crisis communications objectives, the Office of Communications and the Crisis Communications Team will work together to keep the media and the public current regarding the developing situation. To that end, the OSHA Office of Communications and Crisis Communications Team will take the following actions within the following slightly flexible timeframes taking into account crisis situational reality, availability of accurate information and the needs of news cycles:

Within 8 Hours

- Issue a news release providing:
  - ❑ Facts and the agency's position and core message relevant to the situation, explaining the agency's role and differentiating between its assistance, technical support capabilities and enforcement;
  - ❑ Expression of sympathy for the families of any victims of the crisis;

- ❑ Statement as to whether the agency will investigate the situation, if appropriate (or this announcement could be a second release a few hours after the first if more appropriate);
- ❑ Reference, if needed, to State plan or public sector employee issues involved;
- ❑ Enforcement posture of the agency if known (this may be contained in a later release as well);
- ❑ Safety and health information critical for employees, employers, and the general public;
- ❑ Cautionary guidance regarding public volunteers; and
- ❑ Helpful information concerning donation of equipment.

Post information and messages on the OSHA website and work to ensure that the media and stakeholders are alerted to availability of information on the website.

- Establish the availability, credibility, and expertise of spokespersons onsite.
- Use press conferences, briefings, interviews, and other tools to ensure that critical information is publicized effectively.
- Use high-level officials to make important announcements so that messages are effectively delivered.
- Use visuals to reinforce the agency's message if resources and time permit.
- Tell the media when the next briefing will occur at the conclusion of each briefing if possible.
- Assess media coverage to determine if messages and facts are being clearly reported and if there are any issues that the agency needs to address immediately, including policy inaccuracies, jurisdictional concerns, legal matters, rumors, misstatement of facts or other items that lead to public misunderstanding. Adjustments and corrections must be made immediately.
- Develop and maintain talking points on the situation for the Crisis Communications Team and agency management.
- Update information, talking points, and the website continuously.
- Never speculate on events or respond to hypothetical questions.
- Never release names of victims involved in the crisis.
- Establish public affairs contacts with other agencies and organizations involved in the crisis (i.e., names, phone numbers, e-mails), and develop effective working relationships with them.
- Ensure that OSHA spokespersons take the lead when and where OSHA issues, facts, responsibilities, and actions are involved.

Within 48 Hours

- Develop a resource book that includes press, agency, technical, and organizational contacts; other resources useful for the Crisis Communications Team; news clips; an index to acquired television coverage; talking points; statements; releases; and an index of material released to the media.
- Assess facts, issues, messages, positions, and media coverage. Update the full Crisis Communications Team both onsite and at agency headquarters to maintain message management, control rumors, and ensure that the public is receiving accurate information.

- Establish secure areas for team members and for news briefings.
- Continue regular media briefings by team spokespersons as the facts and situation permit. Announce news and deliver the agency's message, refute misinformation, and dispel any confusion.
- Continue to communicate with stakeholders and the public. Issue briefings, statements, and alerts. Update information on the agency's website. Consider conducting press conferences, briefings, town hall meetings, interviews, and other options to ensure public awareness.
- Provide regular updates to the Office of the Assistant Secretary, the Department's Office of Public Affairs, and Office of Congressional and Intergovernmental Affairs.
- Work with the Department in preparing briefings for the White House or other high levels of government. Enlist support as necessary in ensuring White House coordination of messages.
- Provide internal information for agency employees by email, the Intranet, or other sources.
- Expand the scope of media activities as the situation, issues, and facts warrant. For example, arrange a satellite media tour for the Assistant Secretary on or off site, and produce suitable pictures and B-roll footage for use in the satellite media tour to further support the agency's activities and messages.
- Consider involving the Secretary of Labor and other high-ranking Administration officials to raise the visibility of the agency's efforts, activities, and messages involved in the emergency to improve OSHA's ability to break through in reaching target audiences.

After 48 Hours

- Use all tools available to provide information to the public, explaining facts and developments concerning the emergency or crisis, including regularly updated talking points, web materials, pictures, press kits, and B-roll footage; press releases, press briefings as often as practical on or near the site; trade press briefings on phones or in person in Washington, D.C.
- Develop and issue human-interest stories for local media on individuals and circumstances involved in the crisis. By this time the media and the public are interested in more depth and frequently are anxious for human-interest details.
- Continue to monitor media coverage, provide updates and corrections, and refute misinformation.
- Continue to communicate to workers that OSHA is there for their protection and inform the media of what the agency is doing to protect workers.
- Assess agency messages to determine effectiveness. Restate and redirect as needed.
- Advise and brief Assistant Secretary and the Department on circumstances and situation.
- Coordinate with third parties, such as other government agencies, professional organizations, associations, union and employee representatives, and others. When appropriate, secure endorsements to reinforce consistency and uniformity in public communications.
- Manage rumor mill and misinformation by responding quickly and appropriately. Pay careful attention to improper or unnecessary calls for volunteers, equipment, or donations that could endanger individuals or complicate circumstances.

- Aggressively refute inaccurate, misleading information through the use of public affairs techniques, such as op-ed pieces, letters to the editor, and the agency website.
- Consider additional communications opportunities, such as reports on the crisis, congressional hearings, partnership signings, crisis anniversaries, and other events to explain worker protections and OSHA's messages.
- Review and evaluate communications effectiveness after each major event and amend public affairs manual if necessary.

Checklist 1 – Office of Communications

Advance Planning

- ☐ Ensure that all senior public information specialists in OSHA and OPA have "Go Kits."
- ☐ Establish senior public information staff for on-the-record statements, if needed.
- ☐ Identify backups in advance.
- ☐ Provide cell phones, laptops, and digital cameras for Crisis Communications Team.
- ☐ Issue government credit cards to team and backups.
- ☐ Provide PPE training and test-fit of respiratory equipment for Crisis Communications Team
- ☐ Prepare boilerplate releases for the web.
- ☐ Obtain blanket travel authorizations for Crisis Communications Team.
- ☐ Conduct plan practice with the Crisis Communications Team at least annually.

Immediately

- ☐ Activate communications team: 2 public information specialists and other team members with backups as needed.
- ☐ Arrange for administrative support for communications team and coordinate with Regional Office.
- ☐ Get communications team onsite and integrated with the JIC if one is established.
- ☐ Ensure 2-person communications coverage ASAP.
- ☐ Identify onsite agency spokesperson for the media or at the JIC.
- ☐ Brief Assistant Secretary, senior agency staff, and DOL-OPA.
- ☐ Start monitoring media on Internet and other 24/7 media ASAP.
- ☐ Research inspection history of site and companies as appropriate.
- ☐ Activate on site communications center.

First 8 Hours

- ☐ Issue first release ASAP.
- ☐ Issue web postings ASAP.
- ☐ Get spokesperson out front.
- ☐ Consider media briefing/press conference, if JIC has not been established.
- ☐ Hold first briefing if possible, using visuals to reinforce message and let press know when next briefing is to occur.
- ☐ Continue assessing media.
- ☐ Develop talking points for site, national office, others.
- ☐ Obtain as much added information as possible from incident command.
- ☐ Ensure phones, laptops, and resource information are provided.
- ☐ Establish public affairs relations with relevant agencies (i.e., names, phone numbers, e-mail addresses) and determine working relationships.
- ☐ Obtain or create press lists with names, phone numbers, e-mail addresses, and fax numbers.
- ☐ Enlist support of DOL-OPA in managing communication process and White House coordination of message

Public Affairs Office Checklist (cont.)

Within 48 Hours

- ☐ Build resource book-press contacts, agency contacts, technical contacts and resources, clips, talking points, etc.
- ☐ Assess facts and update full team (onsite, agency, Washington, D.C.) to maintain message management, rumor control. Get spokesperson out again, keep it going regularly as reasonably as possible.
- ☐ Coordinate and communicate with important stakeholders.
- ☐ Consider satellite media tour on or off site, pictures, and B-roll if available.
- ☐ Conduct internal employee briefing.
- ☐ Consider bringing Secretary and other high-ranking Administration officials or MOC to raise visibility of worker protection efforts.

After 48 Hours

- ☐ Update regularly talking points, web materials, pictures, and B-roll.
- ☐ Issue press releases and schedule press briefings as often as practical on or near the site.
- ☐ Trade press briefings on phones or in person in Washington, D.C.
- ☐ Monitor media coverage continually.
- ☐ Develop press kits if appropriate.
- ☐ Develop and issue human-interest stories, back-home stories on people who participate.
- ☐ Communicate to workers that OSHA is there for their protection and tell media what is being communicated to workers.
- ☐ Look for and promote successes both large and small.
- ☐ Assess public affairs message regularly; advise and brief Assistant Secretary and DOL OPA. Use third party validators to reinforce message (i.e. professional safety and health organizations, unions, trade associations, etc.)
- ☐ Manage rumor mill and misinformation, such as improper or unnecessary calls for volunteers, equipment, and donations.
- ☐ Aggressively refute inaccurate, misleading information through all means including op-eds, letters to the editor, website postings.
- ☐ Consider opportunities such as reports, Congressional hearings, partnership signings, anniversaries, and other events to explain worker protection story.
- ☐ Review and evaluate communications effectiveness after each major event and amend public affairs manual if necessary.

Checklist 2 – Spokesperson Questions*

- ☐ Did you mobilize resources and staff quickly?
- ☐ Was top management involved and visible?
- ☐ Did you go immediately to the scene?
- ☐ Did you recognize that public perceptions matter more than facts?
- ☐ Did you express and show concern, empathy, compassion consistently for damages, injuries, and any inconvenience?
- ☐ Did you emphasize dedication, commitment, and social responsibility?
- ☐ Did you provide an early or immediate apology, a list of facts, and an action plan?
- ☐ Were you open and honest about capabilities, needs, and problems?
- ☐ Did you seek outside help, including volunteers?
- ☐ Did you coordinate efforts with other emergency response organizations?
- ☐ Did you avoid the use of technical and legal jargon?
- ☐ Did you avoid providing too much technical detail?
- ☐ Did you know exactly what you wanted to say to the media and did you use two key messages?
- ☐ Did you acknowledge responsibility but avoid placing blame?
- ☐ Did you indicate that investigations are under way to determine the cause?
- ☐ Did you avoid conjecture and speculation (e.g., "what-if" questions)?
- ☐ Did you tell the truth as best you knew it?
- ☐ Did you enlist support from credible third parties?
- ☐ Did you use examples, human-interest stories, and concrete analogies to establish a common understanding?
- ☐ Did you avoid statements that imply that cost is more important than public safety, health, or the environment?
- ☐ Did you stay calm? Did you ever lose your temper?
- ☐ Were you sensitive to the nonverbal messages you were communicating?
- ☐ Did you monitor and listen closely to what the news media, public officials, and other important players were saying and the questions they are asking?
- ☐ Did you avoid statements that appeared to evade or shift responsibility?
- ☐ Did you use simple visuals and graphics as much as possible?
- ☐ Did you ever say “No comment?”
- ☐ Did you ever go off-the-record?
- ☐ Were you easily accessible to the media?
- ☐ Did you control the flow of information?
- ☐ Did you withhold names of injured or deceased until next-of-kin were properly notified?
- ☐ Did you indicate that you would get back by a specific time with an answer if you did not know an answer to a question?
- ☐ Did you practice what you planned to say to the media aloud and did you test it?

* Source: Covello, V. Risk Communication Paper, Opening the Black Box Risk Conference, McMaster University, 1995.

Appendix A – Crisis Communications Team Members and Contacts (not for public distribution)

Appendix B – Stakeholder Contacts (not for public distribution)

Appendix C – Questions Commonly Asked by Journalists in a Crisis*

- What is your name and title?
- What are your job responsibilities?
- What are your qualifications?
- Can you tell us what happened?
- When did it happen?
- Where did it happen?
- Who was harmed?
- Are those harmed getting help?
- How certain are you about this information?
- Is the situation now under control?
- How certain are you that the situation is under control?
- Is there any immediate danger?
- What is being done in response to what happened?
- Who is in charge?
- What can we expect next?
- What are you advising people to do?
- How long before the situation returns to normal?
- What help has been requested or offered from others?
- What responses have you received?
- Can you be specific about the types of harm that occurred?
- What are the names of those who were harmed?
- Can we talk with them?
- How much damage occurred?
- What other damage may have occurred?
- How certain are you?
- How much damage do you expect?
- What are you doing now?
- Who else is involved in the response?
- Why did this happen?
- What was the cause?
- Did you have any forewarning that this might happen?
- Why wasn't this prevented from happening?
- What else can go wrong?
- If you are not sure of the cause, what is your best guess?
- Who caused this to happen?
- Who is to blame?
- Could this have been avoided?
- Do you think those involved handled this situation well enough?
- When did your response to this begin?
- When were you notified that something had happened?
- Who is conducting the investigation?
- What have you found out so far?
- Why was more not done to prevent this from happening?
- What is your personal opinion?
- What are you telling your own family?
- Are all those involved in agreement?
- Are people over reacting?
- Which laws are applicable?

- Has anyone broken the law?
- How certain are you?
- Has anyone made any mistakes?
- How certain are you?
- Have you told us everything you know?
- What are you not telling us?
- What effects will this have on the people involved?
- What precautionary measures were taken?
- Do you accept responsibility for what happened?
- Has this ever happened before?
- Can this happen elsewhere?
- What is the worst-case scenario?
- What were the lessons learned?
- Were those lessons implemented?
- What can be done to prevent this from happening again?
- What would you like to say to those that have been harmed and to their families?
- Is there any continuing danger?
- Are people out of danger? Are people safe?
- Will there be inconvenience to employees or to the public?
- How much will all this cost?
- Are you able and willing to pay the costs?
- Who else will pay the costs?
- When will we find out more?
- What steps are being taken to avoid a similar event?
- What lessons have you learned about why those steps have not already been taken?
- What does this all mean?

* Source: Keeping Your Head in A crisis: Responding To Communication Challenges Posed By Bioterrorism and Emerging Infectious Diseases, Association of State and Territorial Health Officers (ASTO), by V.T. Covello, 2002, in press.

Appendix D – Handy Reference Clip Card

Tips for Communicating in a Crisis

- **Remain calm.** Help ease public concerns and fears.
- **Stick to the facts.** Do not speculate or hypothesize about circumstances.
- **Stay on message.** Deliver the agency position and not your personal opinion.
- **Speak clearly.** Use lay terms and avoid technical language and jargon.
- **Talk in short sentences.** You will be easier to understand and to quote.
- **Never lie.** It will catch up with you.
- **Do not say "No Comment."** For example, say instead "As a matter of policy, we don't comment on open cases."
- **Avoid showing anger or humor.** Both are inappropriate in most cases and can cause you trouble.
- **Don't make promises you can't keep.** You will regret it.
- **Don't talk about other things.** Stay focused on the issues at hand and avoid ones that are unrelated.

Appendix G — List of Contract Laboratories

Contract Laboratories for Emergency Use

Region	Laboratory City, State	Emergency Contact Information	AIHA Accreditation	Other Specialty
1	Environmental Health Laboratory Cromwell, CT 860-635-6475	James Kenny 860-916-2906 (cell)	MSAOL	GC/MS, thermal desorption
1	Hartford Insurance Co Hartford, CT 860-547-2805; 860-547-2833; 800-986-3509	Cindy Gosselin Ann McClure - 860-379-5226	MSAO	methyl amines
1	Travelers Property Casualty Corp Windsor, CT 860-687-7410	Marcel Baril 860-687-7410	MSAO	SEM
1	Liberty Mutual Insurance Co Hopkinton, MA 800-230-6263 - ext 352	Ethyl Patricio - Ed Stevenson 508-561-6305 508-259-8563	MSAO	Breathing Air D and E. Medical Gases N2O, O2, total Hydrocarbons, CO, and CO2 Uninterrupted Power Supply (UPS Generator)
2	EMSL Westmont, NJ 856-858-4800	Rob D'Malo 856-261-0423	SAOLBF	PCR, Biological
2	Galson East Syracuse, NY 888-432-5227	Pam Weaver 888-445-5302 - (pager)	MSAOL	ENTEC Canisters, AIHA Microbiology Accreditation pending
3	Free-Col Labs Meadville, PA 814-724-6242 ext 337	Zane Albaugh John Paraska 814-724-3726	MSAOL	
3	RJ Lee Group Monroeville, PA 724-325-1776	Drew VanOrden - Keith Rickabaugh 724-325-1776	MSAOL	
3	MSHA Pittsburgh, PA 412-386-6858; 412-386-6711	Robert Haney - Mark Wesoloski 412 386-6711	MSO	Metals, C. Silica, Mine Gas, Some solvents

Region	Laboratory City, State	Emergency Contact Information	AIHA Accreditation	Other Specialty
3	Analytics Corp Richmond, VA 804-264-7100 - ext 5003	James Calpin - Chris Lapallo 804-794-2787 804-640-8339	MSAOL	Non-Asbestos fibers, molds and spores PLM
4	Analytical Environmental Services Atlanta, GA 770-457-8177	Mila Crain 770-457-8177	MAOL	
4	Research Triangle Institute Research Triangle Park, NC 919-541-6747	Elizabeth Hill Press 0 - Bruce Harvey x6573 Bill Gutknecht x6883	MAOL	IH services, Biolevel 2 Lab
4	Tennessee Department of Labor Nashville, TN 615-741-2750	Jill Bulter 615-741-2750	MSAO	
5	Kemper, NATLSCO Long Grove, IL 847 320-7188	Bill Walsh 815-394-0808	MSAOL	Diesel Particulate
5	Michigan Department of Consumer & Industry Lansing, MI 517-241-0582	Henry Rayn 517-241-0582	MSAO	
5	Clayton Group Novi, MI 800-806-5887	Allen Schinsky 888-702-8500	MSAOL	AIHA Microbiology Accreditation pending, EPA Soil, water TL 17, Tl11, TL10
5	Wisconsin Occupational Health Lab Madison, WI 800-446-0403	Terry Burke 608-263-3280	MSAOLBF	Particle ID Optical, TEM; Access to University Radiation services
6	Armstrong Forensic Lab Arlington, TX 817-275-2691	Michael Armstrong (Pres) - Ben Armstrong (VP) 817-909-1996 817-446-3764	MSAO	
6	HIH Laboratory Webster, TX 281-338-9000	Carol Newman - Jerry Bright 713-594-2478	MSAOL	

Region	Laboratory City, State	Emergency Contact Information	AIHA Accreditation	Other Specialty
7	Certified Environmental Management Salina, KS 785-823-0492	Bruce Fast 785-822-1983	MSAO	
7	EnviroHealth Technologies, Inc St. Louis, MO 314-531-9868	Bill Lowry 314-323-8461	MAOL	
8	Reservoirs Environmental Services Denver, CO 303-964-1986	Jeannie Orr 303-929-6253	MAOL	Molds
8	Johns Manville Littleton, CO 303-978-5253	Chris Griffin Chris Griffin - 303-807-3245 - Scott Steiner - 303-978-2584	MSAOL	
8	Data Chem Salt Lake City, UT 801-266-7700	Rand Potter 801-275-1628 - (pager)	MSAOL	FS Environmental services; Lrg, Sm SUMA canisters; pesticides; organo-phosphates, passive SS thermal desorption
9	Fiberquant Analytical Services Phoenix, AZ 602-276-6139	Michael Breu 602-401-0331	MAL	
9	Aerotech Laboratories Tempe, AZ 480-967-1310	Karen Walters 602-501-9322	MO	Anthrax, Bacteria, Virus, Bio-terrorist chemicals
9	California Department of Health Services Berkeley, CA 510-540-2469	Peter Flessel 510-319-7174 (pager) Steven Wall 510-319-7178 (pager)	MSAOL	Limited capacity
9	Lawrence Livermore National Laboratories Livermore, CA 925-423-7348	Rohit Shah 925-373-0231	MOL	ICP metal scans, Be, Gross alpha, beta radiation
9	Health Science Associates Los Alamitos, CA 714-220-3922	Mike Chapman Jamie Steadman-Lyde Jennine Weitzel 714-220-3922 714-268-3091	MSAO	Some Radiation
9	EMS Laboratories Pasadena, CA 626-568-4065	Bernadine Kolk 626-568-4065	MSAOL	General IH

Region	Laboratory City, State	Emergency Contact Information	AIHA Accreditation	Other Specialty
10	Oregon Occupational Health Laboratory Portland, OR 503-731-8398	Kermit McCarthy 503-287-5787 Cliff Gill 503 642-3416	MSAO	They have a lot of field equipment available
10	Washington State OSHA Olympia, WA 360-902-5171	Phil Peters 360-951-3140 - (cell)	MSAO	AIHA Microbiology Accreditation pending
10	University of Washington Seattle, WA 206-616-7159	Rolf Hanna Rolf Hanna - 206-526-9513 - Russell Bills - 206-543-3263	MSAO	Field services from university can be made available; P/E Thermal desorption tubes GC/MS, IR on gas samples; Breathing air for fire fighters, divers; metabolites of organic-phosphates
	Key to AIHA Accreditation:	M = Metals S = Silica A = Asbestos	O = Organics L = Lead B = Bacteria	F = Fungi

Guidance for Use of Contract Laboratories

Purpose: To define the procedures to use in the event that the services of the Salt Lake Technical Center (SLTC) are unavailable because of an interruption of SLTC services, interruption of sample transport services, or other happenstance that prevents the use of laboratory services of the SLTC.

Scope: This document provides operating procedures to be used by field staff to assure that sample analysis of appropriate quality are secured for both compliance and non-compliance monitoring of substances of interest to OSHA. This procedure provides instructions for documentation of sampling such that submissions and results will be consistent with documentation requirements of the Salt Lake Technical Center Laboratory Information System (LISA). There are two basic situations in which contract laboratories may be used. The first is in the event of a suspension of air transport, such as happened in September 2001 when the World Trade Centers were attacked. The second is in the event of an interruption of SLTC services. The intent of this guidance document is to assure that analyses performed outside SLTC are compatible with OSHA=s data requirements.

Procedure: When possible, use the SLTC as a broker to ensure that the proper analysis is performed and that the information required by all parties is collected. The Salt Lake Technical Center will facilitate analysis of your samples by a laboratory in as close proximity to the area office or incident as practical. The phone number for the SLTC is 801-524-7900.

In the event that SLTC is unavailable, or that communication with SLTC cannot be established, the regional or area office may use the attached list of laboratories to have analyses performed. This regionally distributed list was constructed from a larger list of AIHA accredited laboratories. The laboratories on this list were contacted to assess their willingness and availability to perform OSHA analysis on an emergency basis. Not all of the laboratories perform all of the most requested analyses, nor do they all have the capacity to carry a large load of samples. It is necessary to consult the attached list and the laboratory closest to you for availability of any particular analysis. Compliance samples must be performed using OSHA methods or OSHA approved methods. For other sampling, a laboratory should be properly accredited for the requested analysis.

Based upon our experience with the World Trade Center, there are two probable classes of sampling that may be encountered. These are regular compliance samples and non-compliance samples where no enforcement action is contemplated.

Compliance analysis: When a contract laboratory is used for compliance sample analysis, use the OSHA91A form for sample submission and chain of custody, just as you would if the samples were being sent to SLTC. Follow all of the normal submission conventions. Special instructions for form fields follow below and are summarized on the attached OSHA Form 91A. If not otherwise mentioned, follow the usual form instructions.

Establishment Name (block 4): This field must be decided upon early so as to be consistent in spelling and format, including spaces. It may be no longer than 50 characters, including spaces. It is searchable in LISA and therefore has great power to define sub-areas within a larger incident scene.

Lab Sample Number (block 20): This field is reserved for SLTC so that the samples may be added to LISA, and should not be used by the contract lab for its sample number. The contract laboratory should use the Filter/Tube number (block 24) for its number.

Sample Submission Number (block 21): This is the place where the field identifies each individual sample. (Just as for compliance samples). Make sure that you use the bar code from pre-weighed gravimetric samples in line 21, ASample Submission Number.@ This is essential so that the tare or pre-weight can be found and used to determine the weight of collected material on the filters. Gravimetric samples cannot be analyzed without this information.

Filter/Tube Number (block 24): The Contract lab should use this field to number the samples using its laboratory numbers. When submitting samples to contract laboratories, this field is unavailable for Area Office or Regional Office use.

Non-compliance analysis: In an emergency situation, it may be decided to take non-compliance samples for whatever reason. In the World Trade Center effort, it was found that it was desirable to be able to easily single out WTC samples from the LISA database. We have set up a consistent model that can be used generically for such non-compliance samples. This is the case whether or not the samples are sent to SLTC. Special instructions for form fields follow below and are summarized on the attached OSHA Form 91A. If not otherwise mentioned, follow the usual form instructions.

Reporting ID (block 1): 7RRAAAAA Where RR is the region (e.g. 01, 02, etc), AAAAA is the Area Office Reporting ID including the leading 0, if present (e.g. 0213600 for Buffalo Area office).

Inspection Number (block 2): CSHO# - MMDD. Where CSHO# is the 5 character CSHO number, and MMDD is the month and day (e.g. 0112 for January 12). The year is not necessary, it will be clear from the sampling date. *Use this format only for non-compliance samples. Use Proper Inspection numbers for compliance samples.*

Sampling Number (block 3): This is the sheet identifier. It is used to determine which samples will be used in determining time weighted averages and severities. For every unique combination of blocks 1 and 2, all of the samples having the same Sampling Number will be used to calculate TWA and Severity. It is suggested that each compliance officer sequentially number this field, each desired TWA having a unique number such as 1, 2, or 3, & etc. This number

should be simple. (However, the Sampling number may be no longer than 12 characters, including spaces). *Use this format only for non-compliance samples. Use Pre-printed sampling numbers for compliance samples.. Do not photocopy pre-numbered forms for compliance samples except to combine more than one sheet.*

Establishment Name (block 4): This field must be decided upon early so as to be consistent in spelling and format, including spaces. It may be no longer than 50 characters, including spaces. It is searchable in LISA and therefore has great power to define sub-areas within a larger incident scene.

Lab Sample Number (block 20): This field is reserved for SLTC so that the samples may be added to LISA, and should not be used by the contract lab for its sample number. The contract laboratory should use the Filter/Tube number (block 24) for its number.

Sample Submission Number (block 21): This is the place where the field identifies each individual sample. (Just as for compliance samples). Make sure that you use the bar code from pre-weighed gravimetric samples in line 21, ASample Submission Number.@ This is essential so that the tare or pre-weight can be found and used to determine the weight of collected material on the filters. Gravimetric samples cannot be analyzed without this information.

Filter/Tube Number (block 24): The Contract lab should use this field to number the samples using its laboratory numbers. When submitting samples to contract laboratories, this field is unavailable for Area Office or Regional Office use.

Chain Of Custody: Contract laboratories must maintain a chain of custody record, which must accompany the samples from submission to surrender to SLTC. LISA entries corresponding to Block 34 of FM91A are reserved for SLTC use. The Salt Lake Technical Center will enter data into these fields consistent with the business rules used by SLTC contracting officers.

Air Sampling Worksheet

U.S. Department of Labor
Occupational Safety and Health Administration

1. Reporting ID: 7RRAAAAA	2. Inspection Number: CSHO# - MMDD	3. Sampling Number: SEE INSTRUCTIONS
4. Establishment Name: Use consistent naming scheme PRINT LEGIBLY!		5. Sampling Date / 6. Shipping Date
7. Person Performing Sampling (Signature)	8. Print Last Name	9. CSHO ID

10. Employee (Name, Address, Telephone Number)	14. Exposure Information: a. Number / b. Duration / c. Frequency	
	15. Weather Conditions	16. Photo(s) Y
11. Job Title	12. Occupation Code	
13. PPE (Type and effectiveness)	17. Pump Checks and Adjustments	

18. Job Description, Operation, Work Location(s), Ventilation, and Controls

Cont'd

19. Pump Number:

	Sampling Data					
20. Lab Sample Number	RESERVED FOR SLTC USE					
21. Sample Submission Number	FOR FIELD USE -- *USE BAR CODE NUMBERS ONLY ON PRE-WEIGHED FILTERS*					
22. Sample Type						
23. Sample Media						
24. Filter/Tube Number	USE THIS FIELD FOR CONTRACT LAB NUMBERS					
25. Time On/Off						
26. Total Time *(in minutes)*						
27. Flow Rate ☐ *l/min* ☐ *cc/min*						
28. Volume *(in liters)*						
29. Net Sample Weight *(in mg)*						

30. Analyze Samples for:	31. Indicate Which Samples To Include in TWA, Ceiling, etc. Calculations

32. Interferences and IH Comments to Lab	33. Supporting Samples: a. Blanks: b. Bulks:	34. Chain of Custody: a. Seals Intact? b. Rec'd in Lab c. Rec'd by Anal. d. Anal. Completed e. Calc. Checked f. Supr. OK'd	Initials: Y N	Date

Case File Page / of

OSHA-91A (Rev. 1/84)

Disposition of contracted samples and records: As soon as practical, send a copy of the OSHA 91A and the Contract Laboratory results to SLTC along with any samples which need to be archived (If they have not been used up in analysis). The information will be added to LISA and any accompanying samples will be archived for 6 months (1 year for asbestos) or indefinitely if it is determined to be in the best public interest.

Appendix H —Emergency Transportation Plan

During response to an emergency incident, the Health Response Team (HRT) would rely on the following means of transportation to the incident:

I. Commercial Transport

A. Considered the primary form of transporting HRT individuals and equipment.

B. Consists of commercial airlines, as well as commercial air carriers for equipment (FedEx, UPS).

C. May not be available during some emergency incidents, such as when all commercial and private airplanes are grounded.

II. DHS Transport

A. Considered a backup method for transportation, during instances when commercial transport is not available.

B. The Department of Homeland Security (DHS) manages the "National Deployable Resource Database." Information regarding the number of OSHA HRT individuals and quantity of equipment needing transport during various scenarios has been entered into this database.

C. During an emergency incident, DHS can examine the database and arrange emergency transportation for the HRT.

D. In order for DHS to arrange transportation for the HRT, the following must occur:

1. Presidential Declaration of an emergency, and

2. HRT is requested, likely by one of the Emergency Support Functions (ESFs) or by DHS.

E. The HRT is responsible for ensuring that DHS has current information entered into the National Deployable Resource Database. Updated information will be sent to DHS when necessary.

F. Contact at DHS is Mr. Kurt Bertino (202) 646-3718 / 3789

Appendix I — Comprehensive List of Safety and Health Technical Experts

[Reserved, under development]

Appendix J — Specialized Response Teams – Team Leaders, Members, Mission, and Resources

Overview

Specialized Response Teams will be created by the Agency to perform the following primary emergency response functions:

- Function as the Agency's technical lead on a national basis for emergency response pre-planning activities.
- Provide specialized technical expertise during an emergency response incident.

These teams will be comprised of OSHA personnel from the Health Response Team (HRT) and supplemented by other National, Regional, and/or Area Office personnel with subject matter expertise, as necessary. Specific teams will be formed in the following subject matter areas:

- Toxic Chemicals
- Biological Agents
- Ionizing Radiation
- Structural Collapse

To activate and deploy the Specialized Response Teams, or for additional information, contact the Director, Health Response Team.

Organization

- Each team will be comprised of approximately three to five OSHA personnel with subject matter expertise and experience.
- The HRT will serve as coordinator for the Toxic Chemicals, Biological Agents, and the Ionizing Radiation Specialized Response Teams. The Structural Collapse Team will be coordinated jointly by the HRT and the DOC's Office of Engineering Services.
- Team members will be selected based on their specialized training and/or experience and the qualifications identified under **Member Qualifications**. To the extent possible, volunteers will be selected for team membership.
- Team members from Regional offices will be appointed by the Deputy Assistant Secretary, in consultation with the Regional Administrator.
- Team members will be available to attend initial and annual training and field exercises. See **Specialized and Annual Training**.
- At lease two (2) members of each Team must be medically cleared to wear an SCBA. [Note: OSHA personnel will not use SCBAs to conduct rescue operations, to enter IDLH environments, or to enter environments that have not been adequately characterized. Any decision to use Level B protection must include the approval of the Regional Administrator.]
- Although not required, it is strongly recommended that Team members be cleared at the Top Secret security level.
- See the charts in the NEMP, Appendix D (Model Outline for a Regional Emergency Management Plan) for an illustration of how the Specialized Response Teams will fit into a Regional response effort.

Activation and Deployment

- The primary contact for activation and deployment of any of the Teams is the Director, Health Response Team.
- Each Team will be activated at the request of the Assistant Secretary, the Regional Administrator, or their respective designees. Individual team members who are already located in the affected Region may be deployed by the Area or Regional Office without activation of the entire Team.
- Team deployment will be coordinated by the HRT coordinator on the Team. This individual is responsible for contacting individual team members and their respective Regional Administrators, and determining which available members will be deployed to the site.
- Available team members are responsible for ensuring that they are ready to depart on short notice. This includes having an individual "Go-Kit" (see **Specialized Equipment**) available.
- Team members that are deployed must be available for the anticipated incident duration once deployed. Once Team members are deployed, they will become the asset of the Region/Office requesting assistance and will be directed by the OSHA On-site Leader/Coordinator at the site.

Member Qualifications

All OSHA personnel appointed to a Specialized Response Team must meet the general prerequisites below:

- Medical clearance to wear an SCBA (for those Team members who will be SCBA capable).
- Carry a cellular phone and remain on-call during a covered incident on a 24-hr basis.
- Upon receipt of a call to respond, arrange to be on site as soon as possible, at least by the morning after receiving the call. **Note**: If a Team member responds to the initial emergency request, they will be relieved within one week of the initial request. If a Team member is provided with several days notice to be on site, then they will be relieved after two (2) weeks, at the latest. For long-term responses, Team members may be assigned to perform additional on-site rotations of two weeks' maximum duration, as necessary. Each Team coordinator is responsible for determining appropriate rotation schedules for their Team.
- OTI 3600: OSHA Technical Assistance for Emergencies.
- OTI 3610: OSHA On-site Leaders/Coordinators Course.
- OTI 222: Respiratory Protection OR equivalent.
- OTI 331: Hazardous Waste Site Inspections OR OTI 335: Emergency Response to Hazardous Substance Release OR OTI 312: Hazardous Waste Site Inspection and Emergency Response for Construction OR equivalent experience.
- OTI 345: Basic Incident Command System (Emergency Management Institute (FEMA) Independent Study Course IS-195).
- OTI 346: Emergency Response to Terrorism (National Fire Academy (FEMA) Self-Study ERT: SS Q534).

In addition to these general criteria, members will possess subject matter training, education, or experience as follows:

Toxic Chemicals: Qualifications

- An advanced degree in Chemistry, Medicine, Toxicology, Safety, or Industrial Hygiene is preferred, **OR** appropriate certification with related field experience in developing exposure control procedures for workers using highly toxic or hazardous substances, **OR** equivalent experience in assessing the hazards of processes/operations involving highly toxic substances and developing process safety and workplace exposure controls.
- Familiarity with and experience using the general classes of equipment, tools, exposure guidelines, and software for assessing chemical processes and workplace environments for highly toxic or hazardous substances and evaluating the risk to workers entering potentially contaminated environments.
- Familiarity with and experience using the personal protective equipment and decontamination methods necessary to protect workers from exposure to highly toxic or hazardous substances.

Biological Agents: Qualifications

- An advanced degree in Medicine, Toxicology, Microbiology, or Industrial Hygiene is preferred, **OR** appropriate certification with related field experience in developing exposure and infection control procedures for workers exposed to biological agents, **OR** equivalent experience in assessing the hazards of processes/operations involving biological agents and developing protective workplace exposure and infection controls
- Familiarity with and experience using the general classes of equipment, tools, and exposure guidelines used for assessing workplace environments for biological agents and evaluating the risk to workers entering potentially contaminated environments.
- Familiarity with and experience using the personal protective equipment and decontamination methods necessary to protect workers from exposure to and infection from biological agents.

Ionizing Radiation: Qualifications

- An advanced degree in Chemistry, Health Physics, or Industrial Hygiene is preferred, **OR** appropriate certification with related field experience in developing radiological contamination and exposure control procedures for workers using ionizing radiation sources, isotopes, and related equipment, **OR** equivalent experience in assessing the hazards of processes/operations involving ionizing radiation and developing protective radiological contamination and workplace exposure controls.
- Familiarity with and experience using the general classes of equipment, tools, and exposure guidelines for assessing workplace environments for ionizing radiation and evaluating the risk to workers entering potentially contaminated environments.
- Familiarity with and experience using the personal protective equipment and decontamination methods necessary to protect workers from exposure to ionizing radiation sources.

Structural Collapse: Qualifications

- A bachelor's degree in Civil, Architectural, or Mechanical engineering and registration as a professional engineer, **OR** equivalent experience as determined by DSTM/HRT in consultation with DOC's Office of Engineering Services.
- An advanced degree in Safety or Industrial Hygiene is preferred, **OR** appropriate certification with related field experience in evaluating comprehensive safety and health hazards associated with a structural collapse, **OR** equivalent experience in assessing structural collapse hazards and developing appropriate engineering and work practice controls.
- Knowledge in the design and construction of buildings, bridges, or other structures. Experience in investigating failures in structures is desired. Familiarity with the design and operation of building utility systems, such as water, electrical, gas, and steam.
- Knowledge of methods for restoring stability to failed structures by shoring, bracing, and reinforcing by new structural elements, including knowledge in the on-site determination of structural integrity of partially collapsed buildings. General familiarity with construction equipment and tools required for rescue/entry operations.
- Familiarity with and experience using personal fall protection systems, including those for initial rescue/entry phase and later, and equipment for building inspection and material testing.
- Familiarity with additional safety and health hazards and related controls likely to be anticipated with a structural collapse, such as confined spaces, control of hazardous energy sources, asbestos, silica, etc.

Team Duties, Functions, and Capabilities

Team Coordinators (HRT and DOC) – General Duties

A Team Coordinator will be assigned for each team. General functions that the Coordinator will be expected to perform during both pre-planning and incident response efforts include at least the following:

Pre-planning:

- Represent the Agency in meetings with other organizations to prepare for a coordinated response.
- Review response plans of OSHA and other organizations.
- Develop subject matter response plans, policy, guidance material, and Team-specific SOPs, as necessary.
- Identify, evaluate, and make recommendations regarding appropriate detection, analytical, and protective equipment for response activities.
- Ensure readiness of specialized detection and protective equipment for team use during response activities.
- Identify, approve, and/or develop outreach and training materials.
- Be familiar with and able to identify, contact, and use other outside resources with specific technical matter expertise to augment OSHA personnel on and/or off site.

During an incident:

- Accessible (cellular phone and/or beeper) for immediate consultation by telephone and/or on-site assistance within 24 hours.
- Provide the OSHA On-site Leader/Coordinator with information about the site, changes in site conditions, and related health and safety recommendations.
- Provide high-level technical expertise to the OSHA On-site Leader/Coordinator.
- Coordinate response actions with similar teams from other responding organizations.

Team Members - General Duties

Team Members (including the Team Coordinator) will be expected to perform the following general functions:

Pre-planning:

- Participate in the training classes and exercises specifically scheduled for the Team.
- Maintain appropriate medical and other clearances required for team membership.
- Assist the Team Coordinator conduct all “pre-planning duties” identified above, when requested.
- Maintain an individual “Go-Kit” (see **Resources and Specialized Equipment**).
- Obtain a blanket travel authorization.
- Maintain familiarity with specialized detection and protective equipment applicable to their respective Team.

During an incident:

- Accessible (cellular phone and/or beeper) for immediate consultation by telephone and/or on-site assistance within 24 hours.
- Provide high-level technical expertise to the On-site Leader/Coordinator.
- Assist the Team Coordinator conduct all “During incident” duties identified above, when requested.
- Provide technical assistance, related to Team expertise, inside and outside the member’s home Region.

Resources and Specialized Equipment

Each Specialized Response Team, through its coordination with the HRT, will maintain or have immediate access to the following resources for use during response activities:

- Specialized personal protective equipment (PPE), applicable to their respective Team.
- Specialized detection equipment, applicable to their respective Team.
- Laboratory analytical support through SLTC or other contract laboratories, as necessary.
- Communications equipment including cell phones, radios, laptop computers, and Internet connectivity.
- Subject matter response plans, policy, guidance material, and Team-specific SOPs, as applicable.

General Equipment – Go Kits

Each Team will maintain individual Go Kits containing equipment that is applicable for their particular application. Detailed equipment lists will be delineated in Team-specific SOPs.

- Routine field safety equipment, such as general industry and construction site PPE, and PPE specific to each Team's role.
- Other field equipment, including items such as tools, office supplies, documentation gear, etc
- Communications equipment, including cellular phone, beeper, and wireless internet, as applicable.

Training: Specialized and Annual Refresher

The Specialized Response Teams will complete appropriate training to maintain expertise and readiness for an emergency response. Each Team will identify and/or develop training resources to meet their specific needs, as necessary. Training will include, at a minimum, the following:

- One (1) week of annual refresher training, which will focus on:
    - OSHA policies/procedures
    - Subject matter refresher information
    - Joint Team training
    - HAZWOPER Refresher information
- One (1) week of annual training through participation in NEMP, TOPOFF, or other field exercises

Medical Surveillance [Refer to NEMP Appendix N]

Medical surveillance requirements for the Specialized Response Teams will be developed by each Team in consultation with the DSTM Office of Occupational Medicine (OOM). Medical surveillance will include medical clearance requirements for SCBA use (for those wearing SCBAs), in addition to any other requirements that may be identified for each team, as necessary. These requirements are outlined in Appendix N of the NEMP.

Appendix K —OSHA's Emergency Preparedness Executive Steering Committee, Charter, Mission, and Goals

U.S. DEPARTMENT OF LABOR

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

Emergency Preparedness Executive Steering Committee

Background

OSHA's mission - to assure safe and healthful conditions for our working men and women - is a vital component of our Nation's homeland security strategy. Homeland Security Presidential Directive-5 specifies that the Nation will manage domestic incidents using a single, comprehensive national incident management system. As the Department of Homeland Security (DHS) implements this National Incident Management System (NIMS) and the subsequent National Response Plan (NRP), OSHA needs to play a leading role in the worker safety and health portions of the system and plan, and to assist in other domestic preparedness and response activities. In response to Mission Assignments from DHS involving nationally significant incidents, OSHA's role can include assisting the Federal safety officers in an Incident Command System structure.

Purpose

The Emergency Preparedness Executive Steering Committee serves as a committee of senior-level executives and provides advice on OSHA's role in emergency preparedness, including OSHA's involvement in the activation of the NRP. Committee executives provide guidance on the response and recovery worker health and safety issues related to the development and implementation of OSHA's emergency preparedness plans and policies, including the development of OSHA's National Emergency Response Plan (NEMP).

Committee Chair

Director, Directorate of Science, Technology and Medicine

Membership

- Assistant Secretary
- Deputy Assistant Secretaries
- Directorate Directors
- Regional Administrators (at least three (3))
- Director, Office of Communications
- Special Assistant for Emergency Preparedness
- State Plan State Representatives (two (2))
- If the Committee is meeting to discuss OSHA's operations during a recent response effort, membership may include the Regional Administrator and the designated State plan officials involved during the incident response.

Tasks

- Develop the Committee's mission, goals, and charter.
- Provide executive level review of the NEMP, including the policies written to support the plan.
- Provide input on policies involving training, equipment, and additional resources (including budget issues) for OSHA personnel as well as for federal/State/local/private responders.
- Review the "lessons learned" resulting from the critiques coordinated by the Director, DSTM, the Director, DEP, and the Director, DCSP, and prepare a comprehensive report for the Assistant Secretary.
- Develop and oversee the implementation of corrective actions in response to the "lessons learned."
- Identify "best practices" related to emergency preparedness and make recommendations for their wider application internally and within other workplaces.
- Coordinate and participate in inter- and intra-Agency Table Top exercises (inter-regional and with other response organizations).
- Coordinate OSHA's participation in TOPOFF exercises.
- Coordinate with national law enforcement, fire protection, and other agencies and organizations to ensure OSHA personnel are able to access the sites of nationally significant incidents.
- Assure that the NEMP is updated periodically, minimally, annually or each time it is activated.
- Review the REMPs developed by each Region for consistency and compatibility with the NEMP.
- Advise the Assistant Secretary on all issues related to these functions.

Meetings

Meetings will be set on an "as needed" basis - when specific issues need to be addressed. Initially, during the development of the NEMP, meetings are likely to be quarterly for the first year. Frequency will diminish as preparedness work is completed.

Special meetings may be scheduled to discuss OSHA's operations during a recent response effort; to review the critique summaries submitted by the Directors of DEP, DSTM, and DCSP at the close of an incident; to identify critical "lessons learned," plausible corrective actions, plan revision, and implementation; and to discuss any other emergency preparedness activities related to a Mission Assignment from the Department of Homeland Security.

Appendix L — The OSHA National Office Emergency Operations Center Equipment List

The OSHA National Office EOC facilities promote the active support of field response in addition to providing incident tracking capability. The following electronic, communications, and computer equipment should be considered when outfitting the OSHA National Office EOC during a covered incident to help facilitate efficient command and control operations:

CHECKLIST: SUGGESTED EQUIPMENT FOR NATIONAL OFFICE EOC			
Yes	**No**	**N/A**	**Suggested Equipment**
			A TV/VCR - to monitor news and weather as it relates to incidents, to watch press conferences, and identify sources of misinformation.
			A communications system [reserved - system is under evaluation] - to communicate with Regional and onsite OSHA personnel and other Federal organizations. Consider including: • Satellite telephones (National Office, two), • Nextel telephones, • Hand-held radios, • Hand-held computers with cellular internet capabilities, • Secure cellular telephones, and • Pagers with text messaging capabilities.
			An expansion of the existing networked computer system – to include up to 6 available terminals and appropriate network connections to track incidents, prepare reports, prepare news releases, send and receive email, prepare and deliver briefings, and document National Office response tasks.
			Laptop and/or PDA computer equipment - for use by dispatched OSHA response personnel for remote access (internet and intranet) and communication (via email).
			Fax machines – consider two (2) to send/receive documents.
			A copy machine - to copy essential documents for distribution.
			Essential office supplies - paper, pens, etc.
			Secured Computer and Communication Equipment – consider a minimum of one computer and certify it for use with classified and sensitive information. This equipment can be a dedicated desk top computer isolated (physically and electronically) from other computer equipment and from OSHA response personnel without the appropriate clearance/authorization. Secure telephonic communication may also be provided, if necessary.

Appendix M — REMP Response Checklists (Examples)

[Note: These checklists are examples only. Regions may use these checklists as they appear or modify them to meet their own circumstances and needs.]

- ❑ Internal Health and Safety Coordinator Response Checklist
- ❑ National Office Liaison Response Checklist
- ❑ Logistics Coordinator Response Checklist
- ❑ OSHA's Representative for the site Emergency Operations Center Response Checklist (Support to other Federal and State agency EOC)
- ❑ Public Information Officer Response Checklist
- ❑ Safety Risk Assessment/Monitoring Coordinator Response Checklist
- ❑ Health Risk Assessment/Monitoring Coordinator Response Checklist
- ❑ Sampling Coordinator Response Checklist
- ❑ PPE Coordinator Response Checklist
- ❑ Employer/Employee Liaison Response Checklist
- ❑ Data Management Response Checklists (for the Health Data Manager, Database Coordinator, and the Data Entry Specialist)

Internal Health and Safety Coordinator Response Checklist

State Plan Coordination: If the incident occurs in a State plan State, then Federal OSHA response activities should be coordinated with designated State plan officials as detailed in the applicable Region/State plan agreements and the REMP.

RESPONSE CHECKLIST: INTERNAL HEALTH AND SAFETY COORDINATOR			
Yes	**No**	**N/A**	**Immediately**
			Coordinate with the OSHA Incident Commander and identify the other OSHA function leaders, and the lead individuals within the site ICS, including State plan representatives, if incident occurs in a State plan State.
			Identify PPE and other control measures needed – discuss operations with OSHA Risk Assessment function leaders.
			Report out on activities – as identified by the OSHA Incident Commander ***(ongoing).***
			Attend regular and special strategic meetings ***(ongoing).***
Yes	**No**	**N/A**	**First 24 hours**
			Identify PPE and other control measures: o Discuss hazards with OSHA Risk Assessment function leaders o Determine PPE requirements based on the operations and risk assessment [respirators (fit-check vs. fit-test), hard hats, eye protection, hearing protection, gloves, full body protection, weather gear, etc.]
			Report out on activities – as determined by the OSHA Incident Commander ***(ongoing)***.
			Attend regular and special strategic meetings ***(ongoing)***
Yes	**No**	**N/A**	**First 48 hours**
			Develop training for all OSHA responders.
			Deliver training program to all OSHA responders.
			Collect and make available wellness information packages for all OSHA responders.
			Prepare a manual of all appropriate OSHA programs and review with all OSHA responders.
			Report out on activities – as determined by OSHA Incident Commander. ***(ongoing)***.
			Attend regular and special strategic meetings ***(ongoing).***

National Office Liaison Response Checklist

State Plan Coordination: If the incident occurs in a State plan State, then Federal OSHA response activities should be coordinated with designated State plan officials as detailed in the applicable Region/State plan agreements and the REMP.

RESPONSE CHECKLIST: NATIONAL OFFICE LIAISON			
Yes	**No**	**N/A**	**First 24 hours:**
			Acquire access to computer, telephone and email/fax.
			Identify National Office contact.
			Ensure National Office staff is aware of your identity and role.
			Determine National Office address list for forwarding updates.
			Send initial summary of incident and response to National Office, OSHA function leaders, and other regional staff.
Yes	**No**	**N/A**	**First 48 hours**
			Establish and update format to address the incident and share with RA, DRA, OSHA Incident Commander(s), and other OSHA function leaders.
			Coordinate with RA, DRA, OSHA Incident Commander(s), and other OSHA function leaders to determine daily reporting time and type of information needed.
			Identify OSHA's representative to the EOC and share phone contact and email information.
			Determine National Office time frame for daily/weekly updates.
			Establish and update email address to include all OSHA function leaders.
			Establish and update email address to include other regional staff.
			Assign subordinate manager to act and assume normal duties.
			If necessary acquire travel and lodging information.

Logistics Coordinator Response Checklist

State Plan Coordination: If the incident occurs in a State plan State, then Federal OSHA response activities should be coordinated with designated State plan officials as detailed in the applicable Region/State plan agreements and the REMP.

RESPONSE CHECKLIST: LOGISTICS COORDINATOR			
Yes	**No**	**N/A**	**First 24-48 hours:**
			Meet with affected managers as well as Regional OSHA function leaders to develop a list of immediate issues demanding attention.
			Meet with representatives of the Regional OASAM management staff in the areas of finance, management services, and human resources.
			Contact OSHA NO budget staff, Human Resource Director, IT Director, SLTC/CTC to secure the immediate support necessary.
			Assign tasks in the areas of lodging, travel, procurement of technical and non-technical supplies, GSA vehicle deployment, information technology, personnel deployment (i.e., scheduling) and attendant personnel compensation/benefit issues and Regional FOIA contact, based on staff proficiency.
			Project cost for overtime, travel, supplies, equipment etc. based on historical data, coupled with management feedback and assessment of disaster relief needs and FEMA/other resource support. Report projected costs to RA/DRA and NO.
			Contact hotels for availability and secure price estimates.
			Arrange for immediate transportation needs.
			Take inventory on supplies needed,
Yes	**No**	**N/A**	**First 48-72 hours:**
			Evaluate computer/data communication related needs: o PCs with Internet and email access, networking/standalone/wireless system, printing capability at various strategic locations: Command Center, Site Ops, etc. o PDAs with customized database program pre-installed for data collection o PDAs with wireless and GPS capability o Level of support from IT staff: network management, PowerPoint application, database application, PDA application, data management, burning CDs, paper document management, etc. o Digital/paper maps from city/county agency or other sources o High speed color printing, scanners, digital cameras o Equipment for orientation/meeting/presentation needs such as LCD projector, laptops, electronic whiteboards o Laptops/printers for PortaCounts

			Contact GSA local motor pools for additional government vehicles, including specialized, as needed.
			Take inventory on supplies/equipment needed, including personnel protective equipment to be loaned to visiting officials on a moment's notice.
			Establish procedures for reporting expenditures and overtime.
			Establish conference call schedule with all Region/Area Offices to communicate reporting procedures and updates.
			Contact vendors for telecommunication equipment and specialized equipment needs (e.g. gators, mules, etc.).
			Establish protocol with OSHA NO for tracking all related expenditures.
			Conduct conference call with affected offices within the Region.
			Reserve hotel rooms and establish hotel command post, if warranted.
			Establish a protocol for receipt of supplies, storing of supplies, distribution and replenishment of supplies.
Yes	**No**	**N/A**	**First 72 hours – 1 week**
			Continue daily huddles and meetings with other function leaders to determine logistical support needed.
			Develop a system for assigning and tracking government vehicles.
			Inventory emergency supplies used and replenish, as needed.
			Purchase/lease communication equipment such as cell phones/two way radios.
			Report to RA/DRA and OSHA NO expenditures to date.
			Conduct first weekly conference call with all affected Area Office personnel and establish scheduled for weekly follow-up calls.
			Track expenditures for travel, overtime, supplies, equipment, etc.
			Communicate with OSHA's Public Affairs Office to secure guidance on processing of FOIA claims.

OSHA's Representative - Site Emergency Operations Center Response Checklist

(Support to other Federal and State agency EOC)

State Plan Coordination: If the incident occurs in a State plan State, then Federal OSHA response activities should be coordinated with designated State plan officials as detailed in the applicable Region/State plan agreements and the REMP.

RESPONSE CHECKLIST: OSHA'S REPRESENTATIVE – SITE EMERGENCY OPERATIONS CENTER			
Yes	**No**	**N/A**	**First 12 hours:**
			Find the site EOC.
			Arrive with or obtain ASAP: o Roster, including e-mail addresses and home phone numbers, of OSHA staff region wide. o The names and contact numbers for the OSHA functions leaders for this response. o Desk supplies, i.e. staplers, pens, paper clips, file folders etc. o OSHA standards
			Secure a place in the site EOC. Obtain list of "Who's Who" at the site EOC and supply it to OSHA Incident Commander, OSHA function leaders, and other OSHA representatives to the site EOC.
			Secure phone service either cell or land line.
			Set up document control system.
			Attend Operations and S & H meetings.
Yes	**No**	**N/A**	**First 24 hours:**
			Secure internet connection and computer.
			Obtain the location and schedule of all meetings.
			Obtain site security and credentialing protocol.
			Set up "phone book" system (paper, floppy disc and CD) and include the names and numbers of people met or contacted as part of the site EOC and all OSHA personnel involved with the site.
			Obtain and review the emergency action plan for the site EOC.
Yes	**No**	**N/A**	**First 48 hours:**
			If the site EOC will be the 24-hour contact point for OSHA field staff when they are on-site, obtain all necessary emergency information for field personnel such as next of kin.
			Set up system to replenish desk supplies.
Yes	**No**	**N/A**	**First 72 hours:**
			Evaluate furniture needs – chairs, desk, file cabinets, etc.
Yes	**No**	**N/A**	**First week:**
			Evaluate OSHA's staffing level at EOC and adjust as needed.
			Evaluate document control and phone book system and adjust as needed.

Public Information Officer Response Checklist

State Plan Coordination: If the incident occurs in a State plan State, then Federal OSHA response activities should be coordinated with designated State plan officials as detailed in the applicable Region/State plan agreements and the REMP.

RESPONSE CHECKLIST: PUBLIC INFORMATION OFFICER			
Yes	**No**	**N/A**	**Advance Planning:**
			Ensure that all senior public information specialists in OSHA and OPA have "Go Kits."
			Establish senior public information staff for on-the-record statements, if needed.
			Identify backups in advance.
			Provide cell phones, laptops, and digital cameras for Crisis Communications Team.
			Issue government credit cards to public affairs team and backups.
			Provide PPE training and fit-testing (respiratory equipment) for Crisis Communications Team.
			Obtain blanket travel authorizations for Crisis Communications Team.
			Prepare boilerplate releases for the web.
			Conduct plan practice with the Crisis Communications Team at least annually.
Yes	**No**	**N/A**	**Immediately:**
			Activate communications team: 2 public information specialists and other team members with backups as needed.
			Arrange for administrative support for communications team and coordinate with Regional Office.
			Get communications team onsite.
			Ensure 2-person communications coverage ASAP.
			Identify onsite agency spokesperson.
			Brief Assistant Secretary, senior agency staff, and DOL-OPA.
			Start monitoring media on Internet and other 24/7 media ASAP.
			Research inspection history of site and companies as appropriate.
			Activate onsite communications center.
Yes	**No**	**N/A**	**First 8 hours:**
			Issue first release ASAP.
			Issue web postings ASAP.
			Get spokesperson out front.
			Consider media briefing/press conference.
			Hold first briefing if possible, using visuals to reinforce message and let press know when next briefing is to occur.
			Continue assessing media.
			Develop talking points for site, National Office, and others.
			Obtain as much added information as possible from the OSHA Incident

			Commander and the site Incident Command.
			Ensure phones, laptops, and resource information are provided.
			Establish public affairs relations with relevant agencies (names, phone numbers, e-mail addresses) and determine working relationship.
			Obtain or create press lists with contact names, phone numbers, e-mail addresses, fax numbers.
			Enlist support of DOL-OPA in managing communication process and White House coordination of message.
Yes	**No**	**N/A**	**First 48 hours:**
			Build resource book with press contacts, agency contacts, technical contacts and resources, clips, talking points, etc.
			Assess facts and update full team (onsite, agency, Washington, D.C.) to maintain message management, rumor control. Get spokesperson out again, keep it going regularly as reasonably as possible.
			Coordinate/communicate with important stakeholders.
			Consider satellite media tour on/offsite, pictures and B-roll if available.
			Conduct internal employee briefing.
			Enlist support of DOL OPA in managing communication process and White House coordination of message.
			Consider bringing Secretary and other high-ranking Administration officials or MOC to raise visibility of worker protection efforts.
Yes	**No**	**N/A**	**Post 48 hours:**
			Update regularly talking points, web materials, pictures, and B-roll.
			Issue press releases and schedule press briefings as often as practical on or near site.
			Trade press briefings on phones or in person in Washington, DC.
			Monitor media coverage continually.
			Develop press kits if appropriate.
			Develop and issue human-interest stories, back-home stories on people who participate.
			Communicate to workers that OSHA is there for their protection and tell media what is being communicated to workers.
			Look for and promote successes both large and small.
			Assess public affairs message regularly; advise and brief Assistant Secretary and DOL OPA. Use third party validators to reinforce message (i.e. professional safety and health organizations, unions, trade associations, etc.).
			Manage rumor mill and misinformation, such as improper or unnecessary calls for volunteers, equipment, and donations.
			Aggressively refute inaccurate, misleading information through all means including op-eds, letters to the editor, website postings.
			Consider opportunities such as reports, Congressional hearings, partnership signings, anniversaries, and other incidents to explain worker protection story.
			Review and evaluate communications effectiveness after each major incident and amend public affairs manual if necessary.

Safety Risk Assessment/Monitoring Coordinator Response Checklist

State Plan Coordination: If the incident occurs in a State plan State, then Federal OSHA response activities should be coordinated with designated State plan officials as detailed in the applicable Region/State plan agreements and the REMP.

RESPONSE CHECKLIST: SAFETY RISK ASSESSMENT/MONITORING COORDINATOR			
Yes	**No**	**N/A**	**First 12 hours:**
			Coordinate with the OSHA Incident Commander and OSHA function leaders, and other responding agencies, including the State plan, to identify the potential safety hazards that need to be evaluated.
			Coordinate with RA and the OSHA Incident Commander to ensure qualified/ pre-selected Safety Specialists have been informed and notified of situation and their likely involvement.
			Determine if onsite assistance from the HRT or the structural collapse Specialized Response Team is necessary and request their assistance through the RA.
			Identify and obtain the equipment and other needed resources necessary to evaluate the site safety hazards.
			Obtain appropriate PPE, including respiratory protection, and other equipment (e.g., communication, computer).
			Ensure personnel and equipment Identify are transported to the site.
Yes	**No**	**N/A**	**First 24 hours:**
			Coordinate with the OSHA Incident Commander and other OSHA function leaders and organize site activities/operations. Brief OSHA personnel on site safety hazards and appropriate controls.
			Establish safety teams and determine if teams need to operate with the State plan or other Agency officials.
			Identify site serious/imminent hazards and ensure these are addressed.
			Review any site maps, diagrams, reports, etc.
			Coordinate with the OSHA Incident Commander and determine if site assessment activities can be conducted. Observe and evaluate site safety hazards and existing site control procedures.
Yes	**No**	**N/A**	**First 48 hours and beyond:**
			Determine if there is a need for long term scheduling and/or a 24-hour presence. Coordinate with the RA and OSHA Incident Commander to ensure adequate personnel are available to provided continuous necessary safety support on site.
			Work with OSHA Incident Commander to ensure an OSHA representative familiar with safety risk assessment attends construction and/or emergency response contract operational meetings.
			Ensure that a system is in place to record OSHA safety involvement.
			Document a chronology of OSHA safety events.
			Ensure that all equipment (radios, PDA's, etc) has been provided and distributed.
			Coordinate with computer specialist for records as needed.

			Begin producing safety hazard reports and update these regularly based on requests from the RA, the OSHA Incident Commander, other OSHA function leaders, and the other site response organizations.
			Participate in any established Inter-/Intra-Agency Task Groups or conference calls to support the response.

Health Risk Assessment/Monitoring Coordinator Response Checklist

State Plan Coordination: If the incident occurs in a State plan State, then Federal OSHA response activities should be coordinated with designated State plan officials as detailed in the applicable Region/State plan agreements and the REMP.

RESPONSE CHECKLIST: HEALTH RISK ASSESSMENT/MONITORING COORDINATOR			
Yes	**No**	**N/A**	**First 12 hours:**
			Coordinate with the OSHA Incident Commander and OSHA function leaders, and other responding agencies, including the State plan, to identify the potential health hazards that need to be assessed. Review any existing initial reports and information.
			Identify the sampling that OSHA is prepared to conduct and obtain sampling media and sampling equipment for immediate use. Develop an initial health risk assessment.
			Consult with experts (regional expertise, HRT, SLTC, CTC, etc.) to discuss site hazards and identify any other specialized sampling equipment and analytical methodologies that may be necessary.
			Obtain specialized sampling equipment and/or media from CTC, SLTC, or local sources.
			Coordinate with RA and the OSHA Incident Commander to ensure Field Industrial Hygienists, other Health Specialists, and sampling coordinators are available for immediate onsite response.
			Determine if onsite assistance from the HRT or a Specialized Response Team is necessary and request their assistance through the RA.
			Obtain appropriate PPE, including respiratory protection, and other equipment (e.g., communication, computer).
			Determine if an initial site assessment has been made and if initial sampling can be performed.
			Identify areas where onsite responders are likely to be exposed at the highest concentrations and deploy OSHA personnel to begin sampling.
Yes	**No**	**N/A**	**First 12 – 24 hours:**
			Brief the OSHA Incident Commander and OSHA function leaders on the site health hazards and any available OSHA sample results or those from other responding organizations.
			Ensure that appropriate equipment and sampling media is onsite within 24 hours and that sampling is coordinated.
			Coordinate with other responding organizations to review their sampling data and discuss OSHA sampling data.
			Determine where samples where be shipped and how they will be transported.
			Coordinate with the RA and OSHA Incident Commander to ensure adequate sampling personnel are available to provided continuous sampling support on site.
			Ensure that data system has been established to manage all sampling data.

			Re-evaluate initial hazard assessment and determine if site exposure controls and site sampling strategy is appropriate. Revise as necessary. Adjust the allocation of personnel and equipment accordingly.
Yes	**No**	**N/A**	**First 24 – 48 hours:**
			Begin producing health hazard reports and update these regularly based on requests from the RA, the OSHA Incident Commander, other OSHA function leaders, and the other site response organizations.
			Coordinate with the RA and other appropriate OSHA personnel to decide what data will be posted on OSHA's public website. Provide data to DEP, DSTM, and DIT through the RA for posting.
			Provide health hazard information to the RA, or designee, for use in updating other Regional and National OSHA personnel.
			Re-evaluate site hazard assessment and determine if site exposure controls and site sampling strategy is appropriate. Revise as necessary. Adjust the allocation of personnel and equipment accordingly.
			Meet with contractors, labor, and other response organizations on-site. Identify OSHA's Health Risk Assessment activities on site and solicit their help in getting workers to wear sampling equipment. Advise them of any protective measures they need to take. Provide them with OSHA's sample result and data analysis. Request information that would help OSHA conduct risk assessment activities, such as operations, complaints, injuries, etc.
Yes	**No**	**N/A**	**First 48 hours – 1 week:**
			Communicate with SLTC routinely to identify any perceived sampling pitfalls and better sampling methods.
			Ensure that personnel are notified of their personal sampling results in writing, within 12 hours (depending on analytical method).
			Work with OSHA Incident Commander to ensure an OSHA representative familiar with health risk assessment attends construction and/or emergency response contract operational meetings.
			Coordinate with the Internal Health and Safety Coordinator to establish scheduled orientation meetings for all new personnel.
			Participate in any established Inter-/Intra- Agency Task Groups or conference calls to support the response.

Sampling Coordinator Response Checklist

State Plan Coordination: If the incident occurs in a State plan State, then Federal OSHA response activities should be coordinated with designated State plan officials as detailed in the applicable Region/State plan agreements and the REMP.

RESPONSE CHECKLIST: SAMPLING COORDINATOR			
Yes	**No**	**N/A**	**First 24 hours:**
Before field IHs arrive and begin working at the site:			
			Have working communication equipment available for contact with field IHs.
			Ensure transportation to and from site is available.
			Have a current list of emergency telephone numbers and points of contact.
			With the Lab/Equipment Technician, begin to inventory available sampling equipment, sampling media, PPE and other equipment and supplies.
			With the Health Risk Assessment/Monitoring Coordinators, develop the initial sampling strategy.
The following activities begin as soon as the field IHs arrive and begin work at the site:			
			Daily in person start-of-day briefings and end-of-day debriefings with field IHs: o Assign sampling duties in accordance with current sampling strategy. o Review daily accomplishments and obstacles. o Brief the IHs on any changes, developments, and new information that might affect their work at the site. o Receive feedback from field IHs on suggestions for future sampling, worker and employer feedback, potential hazards identified, etc. o Determine sampling equipment and media needs, other equipment needs, as well as any PPE or decontamination needed by the field IHs. o Address any other concerns raised by the field IHs.
			Communicate and coordinate with the Logistics Group on any administrative issues which might affect the field IHs, general office supplies needs, as well as non-technical, and communication equipment, and transportation.
			Ensure that field IH's carry and know how to use any necessary communication equipment.
			Ensure that samples are packaged and transported to SLTC for analysis in accordance with established sampling protocol.

			Coordinate with Logistics Group to select and contact an authorized Domestic Express Delivery Services vendor. Current vendors in 2002 include: Airborne, Federal Express, United Airlines, DHL Worldwide Service, Emery, and United Parcel Services. GSA's contract covers all 50 States and Puerto Rico. Contact GSA can be contacted on the phone at (202) 501-0705 with questions. If possible: Obtain preprinted shipping labels and appropriate shipping materials (e.g., boxes, document pouches) from priority shipment carrier. Coordinate with carrier on the shipment of hazardous samples (if appropriate). Arrange either pickup and/or drop off locations with the carrier and ensure seven day a week service (if required by the mission).
			Ensure that samples, sample banks, and sampling forms are properly prepared and that samples and blanks are packaged in accordance with the OSHA Technical Manual for shipment to analytical laboratory (usually SLTC).
			Create a sample logbook and log all samples collected/shipped by analyte (e.g., metals, organics, silica) and type (e.g., personal, area, bulk, blank, wipe).
			Notify the analytical laboratory of the number and type of samples that were shipped. Inform laboratory of appropriate shipment tracking numbers.
			Assign sampling duties in accordance with current sampling strategy.
			Assist Health Risk Assessment/Monitoring Coordinators in preparing any presentations and in ensuring adequate coverage at any intra-Agency meetings.
			Act for the Health Risk Assessment /Monitoring Coordinator in their absence.

PPE Coordinator Response Checklist

State Plan Coordination: If the incident occurs in a State plan State, then Federal OSHA response activities should be coordinated with designated State plan officials as detailed in the applicable Region/State plan agreements and the REMP.

CHECKLIST: PPE COORDINATOR RESPONSE			
Yes	**No**	**N/A**	
			Coordinate with OSHA Incident Command - identify OSHA Incident Commander and other OSHA function leaders.
			Identify PPE needs: o Discuss site hazards and operations with Risk Assessment Coordinators. o Determine PPE requirements based on operations and risk assessment. o Determine need for PortaCounts and related supplies.
			Identify PPE and related suppliers: o Limit selection of PPE for inventory control. o Manufacturers (e.g., 3M, MSA, North, TSI). o Major suppliers [e.g., CTC, Grainger, Lab Safety, PortaCount supplies (alcohol, tubing, adapters, cleaners), computers and peripherals]. o Agency and non-agency PortaCount sources.
			Develop communications with major players: o Medical evaluation provider. o Suppliers. o Customers (OSHA, contractors, rescue workers, other agencies). o Other OSHA function leaders .
			Coordinate delivery of equipment and supplies - GSA, National Guard, local government administrative services, Salvation Army.
			Coordinate with OSHA Incident Commander and other Agencies on site to arrange for adequate, visible and accessible space for PPE operations and supply storage: o Easily accessible to the workers, deliveries and operations center staff. o Operations center - ~ 60' trailer or ~ 750sq. ft. o Immediate supply for two days at operations center. o One week supply at remote location (~ 500sq. ft.) o Intra-incident transportation (4X4, van, ATV).
			Determine a need for and establish remote distribution sites.
			Determine a need for and arrange for mobile distribution.
			Arrange for telephone service: a minimum of three lines (2 phone, 1 fax) and two telephones.

			Ensure adequate supplies to support operations center activities - direct local purchase of routine maintenance supplies (e.g., cleaners, mops, paper towels, office supplies).
			Coordinate with the OSHA Incident Commander and other OSHA function leaders to publicize location of PPE operations center using signs and through communication with other agencies.
			Develop schedules and determine staffing needs based on site work schedule. Coordinate with RA and OSHA Incident Commander to ensure OSHA personnel are available to staff PPE distribution centers.
			Train PPE staff to use PPE and related equipment - e.g., PortaCount, computer, laminator, printer, radio communication, mop.
			Direct activities of PPE staff: o Assignment of work. o Identify site workers and the types of PPE required. o Operations center procedures. ▪ Function. ▪ Emergency procedures. ▪ Work flow. ▪ Crowd control. ▪ Inventory management. ▪ Communication. ▪ Cleaning. ▪ Maintenance.
			Advise the OSHA Incident Commander of all changes in status of resources assigned to the group.
			Develop and coordinate data management: o Fit test records – weekly. o Fit test reports - as needed. o Fit-check vs. fit-test comparisons. o Equipment maintenance - daily and calibration. o PPE issuance. o Inventory control.
			Re-evaluate PPE distribution (on-going). Coordinate with risk assessment and other coordinators.
			Monitor number of workers at the site and coordinate with the OSHA Incident Commander and other OSHA function leaders to continually evaluate the type and volume of PPE necessary for site personnel.

Employer/Employee Liaison Response Checklist

State Plan Coordination: If the incident occurs in a State plan State, then Federal OSHA response activities should be coordinated with designated State plan officials as detailed in the applicable Region/State plan agreements and the REMP.

CHECKLIST: EMPLOYER/EMPLOYEE LIAISON RESPONSE			
Yes	**No**	**N/A**	**First 24 hours:**
			Acquire access to computer, telephone and e-mail/fax.
			Begin to identify stakeholders from the employer community and from among the unions represented.
			Send initial description of relevant stakeholders involved to National Office Liaison, OSHA functional leaders and other regional staff.
Yes	**No**	**N/A**	**First 48 hours:**
			Coordinate with RA, OSHA Incident Commander(s), and other OSHA function leaders to determine daily reporting time and type of information needed.
			Identify OSHA EOC representative and share phone contact and e-mail information.
			Determine time frame for daily/weekly updates.
			Establish e-mail address to include all OSHA function leaders.
			Establish e-mail address to include other OSHA Regional staff.
			If necessary acquire travel and lodging information from Logistics team.
			Begin to identify and recruit credible stakeholders to assemble relevant leaders from contractors, unions, and agencies to discuss securing support for a labor-management partnership and an ongoing system for communication.
			Plan for a meeting with all of the key stakeholders to discuss immediate (communications system, written updates, etc.), intermediate, and long term challenges that must be met. Propose a structure for the site committee, which should be convened as soon as possible.

Data Management Response Checklists

The checklists below relate to an emergency incident that has been characterized by OSHA management as extreme in terms of size, hazards to workers, and interest to the public. Should an OSHA response to such an incident involve significant environmental sampling to assess worker exposures, the following checklists may help in the management of data generated by the sampling activities.

State Plan Coordination: If the incident occurs in a State plan State, then Federal OSHA response activities should be coordinated with designated State plan officials as detailed in the applicable Region/State plan agreements and the REMP.

RESPONSE CHECKLIST: DOCUMENT MANAGEMENT - HEALTH DATA MANAGERS			
Yes	**No**	**N/A**	**Initial Response (1st 48 hours):**
			Communicate with OSHA Health Risk Assessment/Monitoring Coordinator and identify the type of sampling that will be conducted and the type of sample results that will be maintained in the database.
			Assure a method is established for generating a unique inspection number for each day of sampling (item 2 on the 91a).
			Assure a method is established to avoid duplicate sample submission numbers (item # 21 on the 91A form).
			Assure that sampling folders are created for each day samples are collected and that the original sampling forms and chain of custody information are placed in the folder at the time samples are prepared for shipment. When sample results are received, these reports should be added to the sampling folder.
			Coordinate with the OSHA Health Risk Assessment/Monitoring Coordinator and the Sample Management Coordinator to ensure that samples are prepared and shipped to the Lab via prescribed methods. Ensure documents such as include FEDEX slips, information faxed to the lab, etc. are placed in the appropriate sampling folder.
Yes	**No**	**N/A**	**First 48 hours – 1 week**
			Have OSHA Data Entry Specialists available to train/orient and begin recording sampling results data in chart form.
			Have OSHA Database Coordinators available to train/orient and begin to get the database functional.
			Advise OSHA Data Entry Specialists to immediately inform designated individual(s) if sampling results show equal to or greater than half the PEL/TLV of a substance.
			Be prepared to characterize the environment in terms of sampling data and hazard.
			Be prepared to provide such characterization to OSHA personnel at various levels including the Web group in Salt Lake. (Note: In creating written information to be shared with outside stakeholders, it may be necessary to work with internal media experts, and/or various OSHA personnel before it is approved for dissemination.)

			Coordinate with the OSHA Health Risk Assessment/Monitoring Coordinator to establish a standardized lexicon for recording/organizing critical data (standardized language for information such as location, job title, applicable PPE worn/not worn, etc.). Communicate lexicon to Database Coordinator, Data Entry Specialists, Lab, and any Web personnel.
Yes	**No**	**N/A**	**First week and beyond:**
			Once the site database is functional – create reports that identify site sample results and characterize the worksite environment. Provide these reports to the OSHA Health Risk Assessment/Monitoring Coordinator, the OSHA Incident Commander, and the RA. Create reports appropriate for distribution to other internal and external stakeholders (unions, contractors, other government entities, media, and the public) as needed.
			Assure communication with the OSHA Lab and Web personnel is occurring on a routine basis. Assure Web personnel are advised of any problems found with draft Web postings submitted for approval. Assure Summary updates to the Web are occurring on a routine basis.

RESPONSE CHECKLIST: DOCUMENT MANAGEMENT - DATABASE COORDINATORS			
Yes	**No**	**N/A**	**First 48 hours – 1 week:**
			Create a sample database.
			Coordinate with the OSHA Lab so that sampling data can be electronically transferred and imported into the database.
			Communicate with OSHA Health Risk Assessment group members to establish a standardized lexicon for data entry.
Yes	**No**	**N/A**	**First week – 1 month:**
			Once database is operational - coordinated with the OSHA Health Data Manager to create reports that summarize sample results and characterize the worksite environment.
			Train OSHA Health Data Managers and OSHA Data Entry Specialists to use database.

RESPONSE CHECKLIST: DOCUMENT MANAGEMENT - DATA ENTRY SPECIALISTS			
Yes	**No**	**N/A**	**First 48 hours – 1 week:**
			Organize OSHA sampling data in a chart until the electronic database is operational. Include pertinent information such as sample number, time sampled, sample type (personal or area), location, job title, sample result, PEL, etc., in the chart. Divide this charting activity as necessary based on the volume of samples collected
			Utilize a standard lexicon (an established list of terms to adequately describe data factors), if developed, to enter data.
			Advise the designated risk assessment personnel when sample results are found to be greater than or equal to half of the PEL
Yes	**No**	**N/A**	**First week – 1 month:**
			Once database is operational – enter sample information and results in database and discontinue charting.

Appendix N — Medical Surveillance

Medical Clearance Requirements for SCBA Use

1. Annual physical equivalent to a CSHO physical.
2. OOM Protocol for SCBA Clearance.

Additional Medical Monitoring Requirements for Select Personnel

1. Reserved [pre/post exposure treatment and other considerations]

Appendix O — Example Situation Report Formats

Initial Situation Report

The Initial Situation Report (SITREP) serves as an information/intelligence in-brief for OSHA Federal, State plan, and Consultation Project personnel that will be involved in the response once the REMP or the NEMP is activated, as well as the initial written communication to the Regional Administrator or Assistant Secretary regarding the incident. This outline provides an example format and identifies the type of information that should be included in an initial SITREP. This format can be modified to fit the needs of individual Regions and incidents.

1. Date/Time (of SITREP)
2. Incident Type (e.g., CBRNE, natural disaster, chemical plant explosion/fire, structural collapse, etc.)
3. Incident Location
4. Time Incident Occurred
5. Injuries/Fatalities/Missing
6. Site Description
    a. Weather Conditions
    b. Physical Conditions and Site Boundaries (may include a map)
    c. Number and Types of Workers onsite
    d. General Site Operations
    e. Safety/Health Requirements for Site Access (e.g., necessary PPE, training, medical, etc.)
7. Initial Hazards Assessment Information
    a. Anticipated Chemical Hazards and Exposures
    b. Anticipated Physical Hazards and Exposures
    c. Anticipated Biological Hazards and Exposures
    d. Anticipated Radiological Hazards and Exposures
    e. Extent of Contamination
    f. Indications of Secondary Devices/Releases
    g. Site Operations (e.g., tasks and operations that are going on onsite like firefighting, search and rescue, demolition, excavation, etc.)
8. Initial Response
    a. Recommended Monitoring
    b. Recommended PPE
    c. Recommended Decontamination Procedures
    d. OSHA technical experts and resources already onsite
    e. Other agencies and organizations onsite and their capabilities/resources
    f. Emergency Operations Centers and other Operations Centers activated
9. Request for Additional Support
    a. Which Experts/Resources have been activated (HRT, Specialized Response Teams,

CTC for additional PPE, etc.)

b. Experts/Resources that may be necessary during next 24 hours (PPE, sampling/monitoring equipment, additional personnel, HRT, etc.,)

10. Additional Comments/Considerations

Situation Update Report

The Situation Update Report serves to update OSHA personnel onsite (e.g., during shift changes), the Regional Administrator, and the Assistant Secretary regarding the incident. This outline provides an example format and identifies the type of information that should be included in an update report. This format can be modified to fit the needs of individual Regions and incidents.

1. Date/Time (of SITREP)
2. Updated Site Description
    a. Weather Conditions
    b. Physical Conditions and Site Boundaries (may include a map)
    c. Number and Types of Workers onsite
    d. General Site Operations
    e. Safety/Health Requirements for Site Access
3. Updated Hazards Assessment Information
    a. Summary of Sampling Data and Operations Sampled
        i. Chemical Hazards
        ii. Physical Hazards
        iii. Biological Hazards
        iv. Radiological Hazards
    b. Changes in Site Operations
4. Response Information
    a. Changes in Recommended Exposure Controls
    b. OSHA's On-going Activities Onsite (PPE distribution, Site Walkthroughs, Sampling/Monitoring)
    c. OSHA's Participation in Emergency Operations Centers and other Operations Centers
5. Request for Additional Support
    a. Experts/Resources that may be necessary during next 24 hours (PPE, sampling/monitoring equipment, additional personnel, HRT, etc.,)
    b. Requests from on-site agencies/organizations for OSHA assistance
6. Additional Comments/Considerations