

Worker Safety and Health Support Annex

Coordinating Agency:

Department of Labor/Occupational Safety and Health Administration

Cooperating Agencies:

Department of Defense
Department of Energy
Department of Health and Human Services
Department of Homeland Security
Environmental Protection Agency

Introduction

Purpose

The Worker Safety and Health Support Annex provides guidelines for implementing worker safety and health support functions during potential or actual Incidents of National Significance. This annex describes the actions needed to ensure that threats to responder safety and health are anticipated, recognized, evaluated, and controlled consistently so that responders are properly protected during incident management operations.

Scope

- This annex addresses those functions critical to supporting and facilitating the protection of worker safety and health for all emergency responders and response organizations during potential and actual Incidents of National Significance. While this annex addresses coordination and provision of technical assistance for incident safety management activities, it does not address public health and safety.
- Coordination mechanisms and processes used to provide technical assistance for carrying out incident safety management activities include identification and characterization of incident hazards, assessments and analyses of health risks and exposures to responders, medical monitoring, and incident risk management.

Policies

- Emergency Support Function (ESF) #5 – Emergency Management activates the

Department of Labor/Occupational Safety and Health Administration (DOL/OSHA) as the coordinator for worker safety and health technical support. DOL/OSHA then implements the activities described in this annex.

- DOL/OSHA assistance and coordination, as described in this annex, also may be requested during the course of an incident if specific needs are identified by other ESFs or individual agencies.
- Private-sector and Federal employers are responsible for the safety and health of their own employees.
- State and local governments are responsible for worker health and safety pursuant to State and local statutes, and in some cases 40 CFR 311, Worker Protection. This responsibility includes allocating sufficient resources for safety and health programs, training staff, purchasing protective clothing and equipment as needed, and correcting unsafe or unsanitary conditions.
- This annex does not replace the primary responsibilities of the government and employers; rather, it ensures that in fulfilling these responsibilities, response organizations plan and prepare in a consistent manner and that interoperability is a primary consideration for worker safety and health.
- Several Federal and State agencies, including DOL/OSHA and the Environmental Protection Agency (EPA), have oversight authority for responders and response operations. While

these agencies retain their authorities, they are expected to work cooperatively and proactively with Federal, State, local, and private-sector responders prior to and during response operations to ensure the adequate protection of all workers.

- Worker safety and health representatives work with the Joint Information Center (JIC) regarding the release of general occupational safety and health information.

Concept of Operations

General

DOL/OSHA coordinates Federal safety and health assets to provide proactive consideration of all potential hazards; ensures availability and management of all safety resources needed by responders; shares responder safety-related information; and coordinates among Federal agencies, State, local, and tribal governments, and private-sector organizations involved in incident response.

Organization

Headquarters Level

- DOL/OSHA coordinates the activities of the Federal agencies that provide the core architecture for worker safety and health technical support during an Incident of National Significance or when otherwise directed.
- DOL/OSHA and cooperating agencies provide staff to support the Joint Field Office (JFO) Safety Coordinator/Incident Command Post (ICP) Safety Officer. DOL/OSHA and cooperating agencies also may serve as technical specialists in other JFO elements as required.

Regional and Field Level

Representatives from Federal, State, local, and tribal governments and the private sector involved in incident characterization, stabilization, and cleanup meet at least daily to identify and resolve conflicts, share information, and provide the JFO Safety Coordinator/ICP Safety Officer with the information necessary to manage responder safety and health risks.

Pre-Incident Coordination

Coordination Through Existing Organizations and Committees

- DOL/OSHA supports and is a member of the National Response Team under the National Oil and Hazardous Substance Pollution Contingency Plan (NCP).
- Pre-incident coordination also involves other existing interagency committees that focus attention on responder health and safety.

NRP Worker Safety and Health Support Coordination Committee

This standing committee provides the proactive integration of worker safety and health assets needed for preparedness at all levels of government.

- DOL/OSHA coordinates this group through regular meetings and interagency exercises.
- DOL/OSHA and the cooperating agencies report to the Emergency Support Function Leaders Group at least twice yearly on the status of worker safety and health asset readiness.

Pre-Incident Planning Guidance Development and Distribution

- DOL/OSHA works with organizations such as the National Institute of Environmental Health Sciences (NIEHS) Worker Education and Training Program (WETP) National Clearinghouse for Worker Safety and Health Training to consolidate responder safety- and health-related guidance documents, regulations, and resources in one location. This information is provided to other agencies, responders, and

response organizations, including State and local public health departments and emergency management agencies.

- DOL/OSHA's Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) requires training for responders based on the anticipated roles they will play during response to a hazardous substance release (see 29 CFR 1910.120(q)).
- DOL/OSHA works with other organizations that develop and fund responder training to ensure their curricula are consistent in content and message for each level of responder (skilled support, operations level, etc.) and that they support the preparedness objectives listed in the National Incident Management System (NIMS). These organizations include the Department of Homeland Security/Office of State and Local Government Coordination and Preparedness (DHS/OSLGCP), the EPA (HAZWOPER/Emergency Response Training Program), NIEHS, organizations that develop related consensus standards, and other State and local government programs.

Proactive Coordination of Technical Assets and Reach-back Capabilities: DOL/OSHA and cooperating agencies develop and disseminate an inventory of expertise and resources available for response to Incidents of National Significance, and coordinate development of a strategy for their deployment.

Prevention Guidance Development and Distribution: DOL/OSHA coordinates with cooperating agencies to develop and disseminate information on the likely hazards associated with potential incidents and the preventive actions that can be taken to reduce or eliminate illnesses and injuries that may result from hazardous exposure.

Actions

The worker safety and health assets of DOL/OSHA and cooperating agencies support the following actions at the headquarters, regional, and field levels by:

- Providing occupational safety and health technical advice and support to the JFO Safety Officer and Coordination Group, to the ICP Safety Officer(s) involved in incident management, and, if appropriate, at all incident sites;
- Undertaking site-specific occupational safety and health plan development and implementation, and ensuring that plans are coordinated and consistent among multiple sites, as appropriate;
- Identifying and assessing health and safety hazards and characterizing the incident environment, to include continued monitoring of incident safety on a 24/7 basis;
- Carrying out responder personal exposure monitoring, on a 24/7 basis, including task-specific exposure monitoring for:
 - Chemical and biological contaminants; and
 - Physical stressors (e.g., noise, heat/cold, ionizing radiation);
- Providing responder medical surveillance and medical monitoring and, in conjunction with HHS, evaluating the need for longer term epidemiological medical monitoring and surveillance of responders;
- Assessing responder safety and health resource needs and identifying sources for those assets;
- Developing, implementing, and monitoring an incident personal protective equipment (PPE) program, including the selection, use, and decontamination of PPE; implementation of a respiratory protection fit-test program; and distribution of PPE;
- Collecting and managing data (exposure data, accident/injury documentation, etc.) to facilitate consistent data-formatting and data-sharing among response organizations;
- Communicating with labor unions, contractors, and other organizations regarding responder safety and health issues;

- Coordinating and providing incident-specific responder training;
- Providing psychological first aid during and after incident response and recovery activities; and
- Identifying, in coordination with HHS, appropriate immunization and prophylaxis for responders and recovery workers.

As the coordinator for the Worker Safety and Health Support Annex, DOL/OSHA facilitates resolution of

any technical or other disputes among cooperating agencies regarding the actions described above. In the case of a dispute that cannot be resolved, DOL/OSHA summarizes the disputed areas for presentation to the JFO Safety Coordinator/ICP Safety Officer and, if necessary, the JFO Coordination Group for resolution.

After Action

DOL/OSHA facilitates a critique of operations to compile “lessons learned” related to responder safety and health issues.

Responsibilities

Coordinating Agency: DOL/OSHA

- DOL/OSHA, as annex coordinator and worker health and safety coordinator, assists the JFO Safety Coordinator/ICP Safety Officer by providing and coordinating technical support for responder safety and health.
- DOL/OSHA resolves technical, procedural, and risk assessment conflicts, if necessary through formal recourse to the JFO Safety Coordinator/ICP Safety Officer or JFO Coordination Group, before they adversely

affect the consistency and accuracy of the advice and information provided to responders, response organizations, and the JFO Coordination Group.

- DOL/OSHA is responsible for carrying out the policies identified in this annex.
- DOL/OSHA implements a system to capture and manage incident exposure data in a centralized location to enable data-sharing among agencies with a responder health and safety focus.

Cooperating Agencies

| Agency | Responsibilities |
|---|---|
| Department of Defense/U.S. Army Corps of Engineers (DOD/USACE) | <ul style="list-style-type: none"> ▪ When USACE is mission assigned to provide ice, water, emergency power, debris removal, temporary housing, temporary roofing, or structural safety assessment, it deploys Safety and Occupational Health (SOH) professionals to the incident location to provide technical assistance to USACE assets. ▪ USACE SOH professionals coordinate with DOL/OSHA and other annex cooperating agencies to ensure the implementation of coordinated, effective worker safety and health activities in support of the Incident Command System as established in the NIMS. ▪ USACE provides emergency location SOH support through utilization of its worldwide SOH Functional Planning and Response Teams. |
| Department of Energy (DOE) | Functions pertaining to DOE are identified in ESF #12 – Energy and other applicable NRP annexes. |

| Agency | Responsibilities |
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| Department of Health and Human Services | <p>National Institute for Occupational Safety and Health (NIOSH)</p> <p>HHS/NIOSH provides technical support and expertise in the characterization of complex, unknown, and multiple-contaminant worker exposures.</p> <p>HHS/NIOSH and DOL/OSHA collaborate in all areas and ensure that their collective safety and industrial hygiene assets are aligned to produce consistent, vetted advice to the incident command structure.</p> |
| | <p>Agency for Toxic Substances and Disease Registry (ATSDR)</p> <p>Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), section 104(i) [42 U.S.C. 9604(i)], HHS/ATSDR is required to cooperate with HHS/NIOSH and DOL/OSHA to provide information and technical support on: the toxic effects of chemicals based on peer-reviewed studies; emergency medical management information specific to potential exposures; worker protective measures, including selection of appropriate respiratory protection and chemical protective clothing; action levels to upgrade the protective ensemble; and appropriate means of monitoring hazards during response actions as defined in CERCLA.</p> |
| | <p>National Institute of Environmental Health Sciences</p> <p>The Superfund Amendments and Reauthorization Act of 1986 (Title 42 U.S.C. section 9660a) established, under section 126(g), the WETP as an assistance program for the training and education of workers engaged in activities related to hazardous waste removal, containment, and emergency response. The program is managed by HHS/NIEHS and provides:</p> <ul style="list-style-type: none"> ▪ Training technical assistance such as instructional staff, curriculum-development experts, subject-matter experts, and professional staff. ▪ Safety training to worker target populations with respect to the nature and location of the incident and the particular hazards. ▪ Assistance and support in the development and delivery of site-specific health and safety training through appropriately qualified WETP awardee instructional staff. ▪ Assistance such as respirator fit-testing and distribution of PPE. |
| Department of Homeland Security | <p>U.S. Coast Guard (USCG)</p> <p>Functions performed by DHS/USCG are identified in ESF #10 – Oil and Hazardous Materials Response and other applicable annexes.</p> |
| | <p>Emergency Preparedness and Response/Federal Emergency Management Agency (EPR/FEMA)</p> <p>Functions pertaining to DHS/EPR/FEMA are identified in ESF #5 – Emergency Management and other applicable annexes.</p> |
| Environmental Protection Agency | <p>Functions performed by EPA are identified in the ESF #10 – Oil and Hazardous Materials Response Annex, the Nuclear/Radiological Incident Annex, other applicable NRP annexes, and the NCP.</p> |

| Agency | Responsibilities |
|---------------------------------------|--|
| Other Responding Organizations | <p>Other Federal, State, local, and tribal government agencies, as well as private-sector organizations with responders at the incident location, provide technical support and expertise in accordance with their agency's mission and responsibilities, in coordination with DOL/OSHA and annex cooperating agencies.</p> <p>Organizations lacking safety and occupational health technical expertise are expected to provide liaisons to the JFO Coordination Group safety staff, attend appropriate safety briefings, identify issues regarding potential hazards, and communicate those issues to their responder personnel and to the JFO Safety Coordinator/ICP Safety Officer.</p> |