

Support Annex (Worker Safety and Health) to State of Georgia Emergency Operations Plan (GEOP)

## **Support Annex - Worker Safety and Health**

**Coordinating Agency:** Georgia Emergency Management Agency

**Cooperating Agencies:** All State of Georgia Agencies

### **I. Introduction**

#### **A. Background**

During an Incident of National Significance, catastrophic event, Governor's State of Emergency or other State Operation Center activation, operations likely will encompass complex and varied hazards that must be characterized, evaluated, and controlled to protect responders. These hazards could include falls from heights, hazards associated with heavy equipment use, confined space entry, compressed gas use, electrical shock, and the toxic and hazardous substance exposures. The need for a rapid response to an incident increases the risk that responders will be deployed without complete information about the safety and health hazards present.

To ensure that responders are properly protected, the Georgia Emergency Operations Plan (GEOP) Worker Safety and Health Support Annex must be in place to facilitate proactive consideration of all potential hazards and to ensure the availability and coordination of necessary personal protective equipment and other resources used in responding to the incident. A collaborative effort involving the expertise of all likely response organizations is necessary to plan for and implement responder safety and health procedures during the incident.

This annex provides a structure for guidance, collaboration, and planning among the State safety and health assets that support the Incident Command System (ICS), as established by the National Incident Management System (NIMS).

The annex provides operational structure for ensuring implementation of coordinated, effective worker safety and health. It addresses pre-incident response; guidance, asset coordination, and reach-back capabilities during the response; and after-action activities.

This annex does not supersede, but rather coordinates the efforts of multiple response organizations. Its objective is to ensure that the Incident Command/Unified Command (IC/UC), the Safety Officer in the Joint Field Operations (JFO) Coordination Staff, responding organizations, and responders involved receive coordinated, consistent, accurate, and timely safety and health information and technical assistance.

## **B. Purpose**

The purpose of this annex is to detail how response and recovery worker safety and health will be coordinated in support of the on scene Safety Officer and integrated into the IC/UC at the scene of a significant or major incident. The goal of this support is to ensure that responder safety and occupational health injuries and illnesses are anticipated, recognized, evaluated, and controlled consistently so that responders are properly protected during all phases of an incident.

## **C. Scope**

1. This annex applies to all responders and response organizations.
2. When implemented, this annex provides mechanisms to coordinate exposure controls and personal protective equipment (PPE) selection and use within the GEOP structure. This coordination is done in support of the response organizations and their role in the incident.
3. This annex will be implemented during all activations of the State of Georgia GEOP and may be activated in response to a request from another agency (e.g. ESF support annex primary agency) through the Georgia Emergency Management Agency (GEMA). The level of support is determined jointly by the IC/UC, GEMA, and the primary responsible agency.
4. This annex does not address public safety and health.
5. This annex supports the following responder safety and health functional areas:
  - a. Proactive collaboration among response organizations for responder health- and safety-related planning and preparedness.
  - b. Coordination of incident activities including;
    - (1) Incident hazard identification and characterization
    - (2) Guidance for the development, implementation, and monitoring of PPE selection, use, and decontamination;
    - (3) The distribution of PPE to response and recovery personnel;
    - (4) The implementation of a respirator fit-test program;
    - (5) Responder exposure sampling and analysis;

- (6) Responder and site safety and health risk assessment;
- (7) Responder exposure and safety data sharing;
- (8) Development and implementation of the site-specific safety and health plan;
- (9) Coordinating, 24/7 responder safety and health monitoring;
- (10) Provision of technical guidance and risk management to ensure appropriate hazard correction methods; and
- (11) Ongoing evaluation of the site-specific safety and health plan's effectiveness and updating the plan as appropriate.

c. Responder safety and health post-incident and post-exercise evaluation and continuous improvement.

## **II. Policies**

**A.** Private-sector, volunteer organizations, and State employers are responsible for the safety and health of their own employees. Local governments are similarly responsible pursuant to State and local statutes. 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. The GEOP does not replace these primary responsibilities; rather, it ensures that in fulfilling these responsibilities response organizations plan and prepare in a consistent manner and that interoperability is considered.

**B.** Federal agencies, including the Federal Department of Labor/Occupational Safety and Health Administration (DOL-OSHA), and Federal Environmental Protection Agency (EPA), along with state agencies such as the Georgia Department of Natural Resources (Ga DNR), the Georgia Department of Public Health (Ga DPH), and GEMA, have oversight authority for responder safety during response operations.

**C.** GEMA and cooperating agencies will support the incident as advisors to the Safety Officer (SO). GEMA and the annex cooperating agencies serve as technical specialists, preferably within the Planning Section of the on scene IC/UC. The technical specialist coordinates safety and health information and resource needs in support of the Safety Officer.

**D.** Responders are notified of personal sampling results and suggested courses of action as promptly as possible. To protect responder confidentiality, medical information on responders is never released to the public.

**E.** The Joint Information Center (JIC) may be authorized to release general occupational safety and health information only after it has been reviewed by the response organizations impacted and any confidential information noted in the preceding paragraph has been removed.

**F.** Throughout response and recovery operations, the Georgia Division of Public Health (DPH) evaluates the need for longer term epidemiological medical monitoring and surveillance of responders.

**G.** This annex will be modified or revised as necessary and in accordance with the established schedule for GEOP maintenance.

### **III. Concept of Operations**

#### **A. Preparedness**

1. Coordination of responder safety and health issues through existing organizations and committees:

a. Federal DOL-OSHA supports and is a member of the National Response Team (NRT).

b. Several existing Federal interagency committees focus attention on responder health and safety. These committees include the EPA-led Office of Solid Waste and Emergency Response (OSWER)/Labor Union Task Force for Hazardous Material, the Federal Emergency Support Function #10 Interagency Health and Safety Task Force, and the DHS-FEMA Interagency Safety and Health Coordinating Committee that focuses on federal responders and their deployed assets.

2. Preparedness guidance development and distribution:

a. DOL-OSHA works with organizations such as the National Institute for Environmental Health Science (NIEHS) Worker Education and Training Program (WETP), and National Clearinghouse for Worker Safety and Health Training to consolidate responder safety- and health-related guidance documents and resources in one location. They provide this information to other agencies, responders, and response organizations, including State and local public health departments and emergency management agencies.

b. DOL-OSHA's Hazardous Waste Operations and Emergency Response Standard (HAZWOPER, 29 CFR 1910.120) requires training for responders based on the anticipated roles they play during response to a hazardous

substance release (see 29 CFR 1910.120(q)). DOL-OSHA continues working with the other organizations that develop and fund responder training to ensure that individual training 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 NIMS. These organizations include the DHS-Office of Domestic Preparedness, the EPA (HAZWOPER/ER Training Program), NIEHS, organizations that develop related consensus standards, and other State and local government programs.

3. Proactive coordination of technical assets and reach-back capabilities:

Federal DOL-OSHA, GEMA, GA DPH, Ga DNR and cooperating agencies inventory expertise and resources available for response to Incidents of National Significance, then share and discuss a strategy for coordinated deployment.

**B. Prevention:** DOL-OSHA, GEMA and cooperating agencies coordinate to develop and disseminate information about the likely hazards associated with the potential incident and the preventative actions that can be taken to reduce or eliminate illnesses and injuries that may result from exposure to the likely hazards during the incident.

**C. Response and Recovery**

1. The worker safety and health assets support the following functions within the Incident Command System:

- a. Provide occupational safety and health technical advice and assistance to the IC/UC.
- b. Develop, implement, and monitor a site-specific occupational safety and health plan.
- c. Coordinate hazard identification and incident characterization.
- d. Conduct incident safety monitoring, 24/7.
- e. Conduct responder personal exposure monitoring 24/7.
- f. Coordinate responder safety and health risk assessment.

g. Assess and identify responder safety and health resource needs and coordinate these at the incident within the IC/UC structure.

h. Develop, implement, and monitor PPE selection, use, and decontamination guidance.

i. Provide for PPE distribution.

j. Provide for respirator fit testing.

k. Coordinate task-specific responder exposure monitoring for:

(1) Chemical and biological contaminants.

(2) Physical stressors (e.g., noise, heat/cold, ionizing radiation).

l. Ensure that data (exposure data, accident/injury documentation, etc.) is managed in a consistent format and can be shared among response organizations.

m. At the incident, provide liaison to labor unions, contractors, and other organizations concerned about responder safety and health issues.

n. Coordinate and provide incident-specific responder training.

2. Representatives from the private sector; volunteer organizations, State and local, governments; and the Federal agencies involved in incident characterization, stabilization, and cleanup will meet as often as necessary, but at least daily, to identify and resolve conflicts, share information, and ensure that the IC/UC is provided with the information and consensus expert opinion necessary to manage responder safety and health risks.

3. In the case of a dispute that cannot be resolved, GEMA will summarize the disputed areas for presentation to the Safety Officer (SO) and, if necessary, the IC/UC for resolution.

#### **D. After Action**

1. At the conclusion of response and recovery operations, DOL-OSHA facilitates a critique of operations to gather "lessons learned" related to responder safety and health issues. Results of this

critique will be shared with Federal DHS. GEMA and cooperating agencies will give input into this report.

2. This annex will be reviewed and revised, as necessary, in light of the “lessons learned” identified.

#### **IV. Responsibilities**

##### **A. Georgia Department of Labor**

1. During activation, GaDOL acts as the primary agency for the coordination of technical assistance for responder safety and health to the IC/US.

2. GaDOL resolves technical, procedural, and risk assessment conflicts before they adversely affect the consistency and accuracy of the advice and information provided to responders and to the IC/UC.

3. GaDOL is responsible for ensuring that the policies identified in this annex are carried out.

##### **B. Other Responding Organizations**

1. Organizations with responders at the incident provide technical support and expertise in accordance with their agency’s mission and expertise for the incident.

2. Organizations lacking safety and occupational health technical expertise are expected to provide liaisons to the IC/UC safety staff, attend appropriate safety briefings, identify issues about potential hazards, and communicate those issues back both to their responders and to the SO.

#### **V. Terms and Definitions**

**A. Responders:** All individuals engaged in response and recovery activities that address the effects of an emergency or disaster, including personnel from State, local, and Federal governments; skilled support personnel (such as equipment operators); and workers from the private sector and nongovernmental and volunteer organizations.

**B. Response Organizations:** All organizations with responders engaged in response and recovery activities.

## **VI. Authorities and References**

- A. Executive Order 12196, Federal Civilian Personnel.
- B. 29 CFR 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters.
- C. The Occupational Safety and Health Act of 1970 Public Law 91-596.
- D. The Hazardous Waste Operations and Emergency Response Standard, codified at 29 CFR 1910.120 and 29 CFR 1926.62.
- E. The Worker Protection Standard, codified at 40 CFR 311.
- F. The National Oil and Hazardous Substances Pollution Contingency Plan (NCP).
- G. The National Incident Management System (NIMS).
- H. Georgia Emergency Operations Plan, 2006
- I. Governor's Executive Order, 2006