Version 4.0
(January 2017)

Emergency Responder Health and Safety Manual

Introduction

Final

Customized for Region 4 on April 13, 2020

U.S. Environmental Protection Agency

TABLE OF CONTENTS

LIST OF ACRONYMS iii

1.0 OVERVIEW 1
1.1 What Is the Manual? 1
1.2 What Does this Introduction Cover? 1

2.0 THE MANUAL'S AUDIENCE, OBJECTIVES, KEY FEATURES, AND WEBSITE 1
2.1 Target Audience 1
2.2 Main Objectives 2
2.2.1 Protecting Emergency Responders 2
2.2.2 Meeting Regulatory Requirements 2
2.2.3 Promoting a Consistent Approach to Health and Safety Across EPA 2
2.2.4 Providing a "Living" Document 2
2.2.5 Providing Health and Safety Information in a User-Friendly Format 3
2.2.6 Providing the Foundation for Site-Specific Health and Safety Plans (HASPs) 3
2.3 Key Features Found in Each Chapter 3
2.4 The Manual's Website 4

3.0 PROCESS USED TO DEVELOP AND SUPPORT THE MANUAL 4
3.1 Chapter Development 4
3.2 The Manual's Three-Tier Support Structure 4

4.0 INSTRUCTIONS FOR EPA ORGANIZATIONS 5
4.1 Accessing the Manual (and Other Associated Tools) Online 5
4.2 Learning How to Use the Manual 6
4.3 Customizing the Chapters for Your Organization 6
4.3.1 Addressing Yellow-Highlighted Spaces 6
4.3.2 Customizing Appendix A of Each Chapter 6
4.3.3 Documenting Additional Policies and Procedures 7
4.4 Developing a Field Guide 7
4.5 Electronic Access to Customized Documents 8
4.6 Reviewing and Updating Customized Documents 8

5.0 TOPICS THAT PERTAIN TO MULTIPLE CHAPTERS 8
5.1 General Roles and Responsibilities 8
5.2 Pre-Entry Briefings 9
5.3 Tracking the Completion of Safety and Health Training Requirements 9
5.4 Recordkeeping 10

6.0 INTERNAL PROGRAM REVIEWS AND FIELD AUDITS 10
6.1 Internal Program Reviews 10
6.2 Field Audits 10

APPENDIX A Introduction: Designation of Roles and Responsibilities A-1

LIST OF FIGURES

Figure 1 Building the Agency's Health and Safety "House" One Brick at a Time 3
Figure 2 Simplified Example of a Customizable Task Table 7

LIST OF ACRONYMS

CMAD	Consequence Management Advisory Division
EPA	U.S. Environmental Protection Agency
ERT	Environmental Response Team
FRM	Field Readiness Module
HAZMAT	Hazardous material
HASP	Health and safety plan
HQ	Headquarters
HSPC	Health and Safety Program Contact
ICS	Incident Command System
NAR	National Approach to Response
NCP	National Contingency Plan
NRF	National Response Framework
OEM	Office of Emergency Management
OLEM	Office of Land and Emergency Management (formerly called Office of Solid Waste and Emergency Response (OSWER))
OSC	On-Scene Coordinator
OSHA	Occupational Safety and Health Administration (U.S. Department of Labor)
SHEMP	Safety, Health, and Environmental Management Program
SSD	Safety and Sustainability Division (formerly called Safety, Health and Environmental Management Division (SHEMD))

1.0 OVERVIEW

On July 28, 2005, the U.S. Environmental Protection Agency (EPA) issued Office of Solid Waste and Emergency Response (OSWER) Directive 9285.3-12 to announce the availability of the Agency's Emergency Responder Health and Safety Manual (hereinafter "the manual"). The manual has been created as part of the Agency's National Approach to Response (NAR) initiative.

1.1 What Is the Manual?

The manual consists of a series of chapters and a Field Guide. The chapters outline steps that must be taken to protect the Agency's emergency responders (see Text Box 1) from job-related accidents, injuries, and exposures to hazardous materials. In all cases, saving lives and preserving health take precedence over all other considerations. The Field Guide is a short document that summarizes the main points of each of the manual's chapters, providing information that emergency responders need to stay safe in the field.

Text Box 1
EPA's Emergency Responders

EPA's emergency responders respond to sudden releases of oil or hazardous materials (HAZMAT) incidents (including releases of chemical, biological, radiological, and nuclear agents). They must be able to perform their job while wearing a variety of protective clothing and equipment and working under variable environmental conditions.

1.2 What Does this Introduction Cover?

This Introduction presents:

- Information on the manual's target audience, objectives, key features, and website (Section 2).
- An overview of the process used to develop and support the manual (Section 3).
- Instructions on how to implement the manual (Section 4).
- Information that is pertinent to multiple chapters, such as roles and responsibilities of key EPA personnel, the importance of performing pre-entry briefings, and procedures for tracking health and safety training requirements (Section 5).
- Program review and field auditing procedures (Section 6).

2.0 THE MANUAL'S AUDIENCE, OBJECTIVES, KEY FEATURES, AND WEBSITE

2.1 Target Audience

EPA's emergency responders and their managers must work together to implement the requirements and management practices presented in the manual. EPA's emergency responders include:

- On-Scene Coordinators (OSCs)
- Field personnel working for EPA's Environmental Response Team (ERT)
- Field personnel working for EPA's Consequence Management Advisory Division (CMAD)
- Headquarters (HQ) response personnel

All 10 EPA regions, the Office of Land and Emergency Management (OLEM) special teams, and HQ must implement the manual. Other organizations within EPA are also encouraged to do so. **If**

organizations adopt this manual for other groups of EPA employees, however, they may find that some of its minimum requirements are more stringent than required for those particular groups.

2.2 Main Objectives

The manual's main objectives are presented in the subsections that follow.

2.2.1 Protecting Emergency Responders

First and foremost, this manual has been developed to ensure that EPA's emergency responders are protected against potential job-related health and safety hazards. EPA values its workforce and recognizes that its emergency responders perform some of the Agency's highest-risk activities. The manual has been developed to strengthen health and safety programs for these individuals and to satisfy the Agency's obligation to support and protect these workers.

2.2.2 Meeting Regulatory Requirements

Section 19 of the Occupational Safety and Health Act of 1970 instructs all federal agencies to establish and maintain a comprehensive occupational safety and health program and Section 300.135(l) of the National Contingency Plan (NCP) states that OSCs are responsible for worker health and safety concerns at response sites in accordance with Section 300.150(a), which indicates that response actions under the NCP will comply with 29 CFR 1910.120 (the Occupational Safety and Health Administration's [OSHA's] Hazardous Waste Operations and Emergency Response standard). The manual provides the foundation that is needed to meet these requirements. Each chapter in the manual (with the exception of this Introduction) compiles information about a specific health and safety topic, incorporating information that appears in existing OSHA standards, EPA policies and guidance, and other organizations' rules and guidelines. In some instances, the manual stipulates requirements that go beyond those specified by OSHA. EPA's emergency responder program has gained valuable knowledge and experience supporting HAZMAT incidents over the years and applies these best management practices to the manual's chapters.

2.2.3 Promoting a Consistent Approach to Health and Safety across EPA

Implementation of EPA's health and safety programs is decentralized, meaning that EPA regions (as well as HQ and OLEM special teams) are responsible for executing their own health and safety program. Given the nature of the threats that face the nation, the Agency believes it is more important than ever to maintain a mission-ready workforce that is prepared to work within the National Response Framework (NRF), operate within an Incident Command System (ICS), and respond to simultaneous emergencies in one or more regions. To ensure this level of readiness, EPA's emergency responders must share the same baseline level of health and safety preparedness.

Consistency is the cornerstone of EPA's NAR preparedness policy. The manual promotes such consistency by (1) establishing minimum health and safety requirements for EPA's emergency responders that all EPA organizations must meet and (2) taking steps to standardize the manner in which EPA organizations execute their health and safety programs.

2.2.4 Providing a "Living" Document

The manual is a living document. Chapters will be updated and revised if necessary as new information on health and safety requirements and best management practices become available. Emergency responders are encouraged to provide feedback on the manual to their Health and Safety Program Contacts (**HSPCs**) and/or their Safety, Health and Environmental Management Program (**SHEMP**)

Managers (or equivalent OLEM special team and HQ positions), who in turn will forward all relevant feedback to HQ and the Tier 1 and Tier 2 Groups (described in Section 3.2).

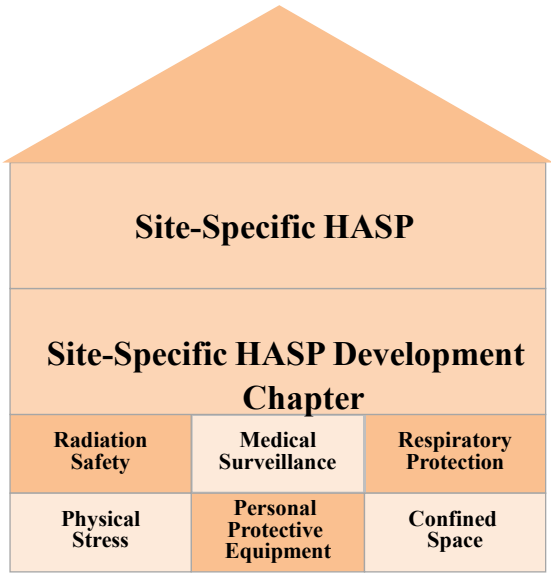
2.2.5 Providing Health and Safety Information in a User-Friendly Format

The manual consolidates information on health and safety requirements from a variety of sources. As such, each chapter provides "one-stop shopping" on a specific health and safety topic. Web links are included to direct users to detailed reference materials. To assist with navigation, internal hyperlinks appear throughout the chapters.

2.2.6 Providing the Foundation for Site-Specific Health and Safety Plans (HASPs)

The manual aims to equip EPA emergency responders with the tools they need to develop comprehensive, effective, legally compliant, and equivalent site-specific HASPs. Chapter 1 of the manual addresses HASP development. Emergency responders should also become familiar with the HASP resources available on the Safety Officer Toolbox website. Figure 1 illustrates how the different pieces of the manual fit together to support HASP development.

Figure 1
Building the Agency's Health and Safety "House" One Brick at a Time



Note: Only six of the manual's chapters are depicted in the schematic figure above; this is not a comprehensive list.

Using construction as an analogy, the site-specific HASP represents the second floor of a house and the following holds it up:

- A **solid foundation** of multiple bricks, which represent the manual's chapters, each of which addresses a specific health and safety topic, such as radiation safety or respiratory protection.
- **A solid first floor** that represents the *Site-Specific HASP Development* chapter, which identifies elements that must be included in a HASP.

2.3 Key Features Found in Each Chapter

Each chapter in the manual presents program requirements for a specific health and safety topic, outlines roles and responsibilities, addresses training requirements, and includes a section on recordkeeping. Each chapter also contains the following:

- **Customizable task table.** Appendix A of each chapter includes a table that (1) lists specific activities that must be performed to ensure the smooth operation of a health and safety program and (2) offers recommendations regarding who (with regard to position title) might be best suited to perform each task. To balance the Agency's desire for standardization with the need for flexibility, however, the manual does allow individual organizations to make the final decision regarding how to assign tasks. This flexibility is offered to promote the best use of resources and should not be interpreted as allowing EPA organizations to remain vague about who is responsible for performing specific tasks.
- **Table that documents additional policies and procedures.** Appendix B of each chapter (with the exception of the Introduction) provides space for users to document any additional existing practices their organizations have implemented that exceed the manual's minimum requirements.
- **Glossary.** Appendix C of each chapter (except for the Introduction) includes a glossary that defines key terms.
- **Implementation checklist.** A checklist was created for each chapter that EPA organizations can use to ensure they are meeting the requirements listed in each chapter. The checklist is intended to serve as an internal tool. The implementation checklists are found in the "Forms" section of the manual's website.

2.4 The Manual's Website

A website (see http://www.epaosc.org/_HealthSafetyManual/index.htm) has been created for the manual. It provides the most up-to-date version of the manual's chapters, a template for the Field Guide, administrative documents, and a variety of tools (e.g., checklists, downloadable forms, training), as described in Section 4.1.

3.0 PROCESS USED TO DEVELOP AND SUPPORT THE MANUAL

3.1 Chapter Development

OSCs, Removal Managers, SHEMP Managers, certified industrial hygienists from EPA's Safety and Sustainability Division (SSD), and representatives from ERT and the Office of Emergency Management (OEM) helped develop the manual. Their input reflects over 30 years of emergency response experience and some of the lessons learned during national mobilizations, such as the World Trade Center attacks, the anthrax attacks of 2001, the *Columbia* Space Shuttle recovery, Hurricanes Rita and Katrina, and the Deepwater Horizon and Enbridge oil spills.

3.2 The Manual's Three-Tier Support Structure

The EPA Response Health and Safety Work Group established a three-tiered support system at the national level to promote the manual, collect feedback on its functionality, and authorize modifications as needed. Key players involved with implementing the manual include:

- **The Tier 1 Committee,** consisting of SHEMP Managers and HSPCs, their OLEM special team counterparts, and HQ representatives. Group members collect feedback on the manual from those implementing health and safety programs across the Agency and resolve issues and problems. If the Tier 1 Group is unable to resolve an issue/problem, the matter is forwarded to the Tier 2 Group. The Tier 1 Group also alerts the Tier 2 Group if resource needs have been identified or changes have been

proposed to the manual. The Workgroup meets monthly via conference call; meeting summaries are posted on the "Workgroup Forum" section of the manual's website.

- **The Tier 2 Committee,** a small steering committee consisting of representatives from the Removal Managers, OEM, SSD, ERT, as well as the Workgroup Group co-chairs. This group helps resolve issues/problems forwarded by the Tier 1 Group. If resolution cannot be reached, the Tier 2 Group forwards the issue to the Tier 3 Group. The Tier 2 Group also coordinates with and briefs the Removal Managers and SHEMP Managers on key health and safety issues (e.g., decisions on the selection and use of respiratory protection) and works with the Superfund Division Directors and the Tier 3 Group to facilitate the chapter review and approval process.
- **The Tier 3 Committee,** consisting of the Director of OEM; the Director of SSD; the Director of the Office of Superfund Remediation and Technology Innovation; the lead regional Division Director for Superfund and Homeland Security; the OLEM Safety, Health and Environmental Management designee; and OEM's Director of the Preparedness and Response Operations Division. The Tier 3 Group is responsible for maintaining (or modifying if necessary) the overall strategic direction of the manual; resolving nationally significant implementation issues; and ensuring that appropriate resources are available to effectively implement the manual's chapters, develop new chapters, revise existing chapters, and develop health and safety training materials. If necessary, the group is called upon to officially authorize/ratify changes that the Tier 1 and Tier 2 Groups propose for the manual.

The charters for the abovementioned three groups are posted on the "Administrative Documents" section of the manual's website.

4.0 INSTRUCTIONS FOR EPA ORGANIZATIONS

As previously mentioned, all 10 regions, OLEM special teams and HQ must implement the manual. These organizations must:

- Adopt the requirements and management practices outlined in the manual.
- Customize the manual's chapters with local information, such as the names of those responsible for specific program tasks within their organization.
- Develop a customized Field Guide.
- Post customized chapters and the Field Guide to the manual's website.
- Review/update customized chapters and the Field Guide annually.

The Removal Managers, SHEMP Manager, and HSPC (or their designees) from each EPA organization should work together to ensure that these tasks are completed.

4.1 Accessing the Manual (and Other Associated Tools) Online

ERT maintains a website for the manual that contains:

- Up-to-date versions of the manual's chapters.
- Information about modifications that have been made to the manual over time.
- Training and tools (e.g., field review safety checklists).

- Administrative documents.
- A template for Field Guides.
- Downloadable forms.
- Customized documents (e.g., customized versions of each organization's chapters and Field Guide).

4.2 Learning How to Use the Manual

The HSPC (or another designated person) should make training on how to use the manual available to emergency responders. A PowerPoint presentation is available on the "Training and Tools" section of the manual's website for this purpose. The training may be provided in a classroom setting, or emergency responders may be asked to download and take the training online.

4.3 Customizing the Chapters for Your Organization

SHEMP Managers, Removal Managers, and HSPCs (as well as their OLEM special team and HQ counterparts) must ensure that the manual's chapters (including this Introduction) are customized with organization-specific information. This entails (1) inserting organization-specific information into yellow-highlighted spaces found throughout the chapter's text and appendices, (2) customizing Appendix A of the Introduction, and (3) documenting additional organization-specific policies and procedures if applicable.

Text Box 2
Example of Yellow-Highlighted Spaces

The Radiation Safety Officer or SHEMP Manager (or another designated person) must ensure that basic radiation safety training is provided to each employee before, or at the time of, his or her enrollment in the personal monitoring program.

4.3.1 Addressing Yellow-Highlighted Spaces

Yellow-highlighted spaces appear throughout the chapters. When users encounter these spaces, they must insert organization-specific information into the space. In the example presented in Text Box 2, users would be expected to indicate who (either by specific name or position title) is responsible for performing a particular task within their organization. In many instances, EPA position titles have been inserted into the spaces to indicate who might be best suited to perform the task (i.e., default assignments). If users do not modify the assignment, the default assignments will be considered acceptable.

4.3.2 Customizing Appendix A of Each Chapter

Appendix A of each chapter includes a customizable task table. Figure 2 presents a simplified example of the table as it appears in the Respiratory Protection Program chapter.

Figure 2
Simplified Example of a Customizable Task Table

	Who Is Responsible for Each Task or Action?				
ROLES ►	Removal Manager	SHEMP Manager	Health and Safety Program Contact	Emergency Responders	Other Key Players
TASKS ▼	See Appendix A-2 of the Introduction for the names of each person that fill these roles.				
Ensure that emergency responders receive respiratory protection training.		✓			
Ensure that all activities related to proper handling, cleaning, inspection, and maintenance of respiratory protection equipment have been delegated and that all involved understand their roles.	✓	✓			
Ensure that SCBAs are periodically inspected by the manufacturer.			✓		

Directions

1. Fill in names of people from your organization under position titles/roles in Appendix A-2 of the Introduction.
2. Add more columns to include additional key players (if necessary).
3. Add rows to incorporate additional tasks (if necessary).
4. Determine if any of the recommended task assignments should be re-assigned, and if so, move the check marks.
5. Ensure that each task is assigned to a specific person in your organization.

Tasks are listed in rows, position titles/roles are listed in columns, and check marks are used to assign tasks to specific people. Check marks have been inserted into the table to indicate the default assignments for each task. In many cases, multiple check marks are used to show that more than one individual bears responsibility for a particular task. EPA organizations may move the check marks to re-assign the tasks. As an example, if a region uses contractors to calibrate radiation-detection equipment, the contractor would be listed as the person responsible for that task even if the default assignment had originally been the HSPC. **Most importantly, each task must be assigned to someone and all task assignments must be communicated to the responsible parties.**

Users must list the names of the people who fill the position titles/roles in the columns of the customizable task table in Appendix A-2 of this Introduction.

4.3.3 Documenting Additional Policies and Procedures

EPA organizations must document any additional policies or procedures they have implemented that exceed the minimum requirements outlined in the manual's chapters. An appendix is provided in each chapter (except the Introduction) to document these policies and procedures.

4.4 Developing a Field Guide

The HSPC (or another designated person) must develop a customized Field Guide for his or her organization. The Field Guide is a compilation of the Quick Reference Guides that appear in each chapter. A template for the Field Guide has been created and posted on the "Field Guide Template" section of the manual's website. The organization-specific information that appears in each chapter's Quick Reference Guide must be re-entered into the Field Guide. Once the Field Guide has been completed, the HSPC (or another designated person) must provide it to emergency responders so they can access it in the field.

4.5 Electronic Access to Customized Documents

Customized versions of the manual's chapters must be posted to the "Customized Documents" section of the manual's website. Making the customized chapters available online will allow the Agency to identify who is responsible for specific tasks across different EPA organizations at a moment's notice—a capability that could be vitally important during a nationally significant incident that requires an Agency-wide response. Individuals with an "epa.gov" e-mail address will be able to view the customized documents that each EPA organization posts.

The Removal Manager (or another designated person), the SHEMP Manager (or another designated person), and the HSPC (or another designated person) will be responsible for ensuring that their organization's customized chapters and Field Guide are posted on the website and that their organization's materials are kept current. (The customized files should be converted to PDF before being posted.) They may also post additional organization-specific information to this site, such as organization-specific policies or procedures that apply to the manual. These individuals will be the only ones within their organization with rights to post or remove documents from the website. These rights may be obtained by contacting ERT's Webmaster.

4.6 Reviewing and Updating Customized Documents

EPA organizations must review and update their customized chapters annually. In the process, they must:

- **Step #1:** Check the "Manual (Master Version)" section of the manual's website to find out whether any of the manual's chapters have been modified. *(Note: The cover page of each chapter lists a version number and date of release.)* If the chapters have been modified, users must re-enter organization-specific information into the new version of the chapters. If the chapters have not been modified, users may simply revisit the most recent version of their customized chapters to determine whether the organization-specific information requires updating.
- **Step #2:** Ensure that any changes in roles or responsibilities are communicated to all relevant EPA managers and staff.

5.0 TOPICS THAT PERTAIN TO MULTIPLE CHAPTERS

5.1 General Roles and Responsibilities

While each chapter presents detailed information about specific tasks that key EPA employees must perform, there are some general responsibilities that these staff must perform that apply to **all** of the chapters in the manual. Those responsibilities are described here. *(Note: Section 5.1 is written with regional audiences in mind, so it uses position titles found within the regions.)*

Removal Managers are responsible for the health and safety of all of the emergency responders who work within their section or branch. Removal Managers must support health and safety programs that the SHEMP Manager establishes, promote all components of a strong workplace health and safety program, and ensure that emergency responders are fully compliant with health and safety requirements before allowing them to work in the field. In addition, Removal Managers must authorize the use of resources to support training, equipment maintenance, and other health and safety-related purchases. They must also appoint a person to serve as the regional HSPC. Removal Managers are ultimately responsible for ensuring that all of the manual's chapters are customized, reviewed and updated annually, and posted on

the manual's website. They must also ensure that the procedures listed in the manual are followed by their organization's emergency responders.

SHEMP Managers are the primary people responsible for overall employee health and safety within each EPA region. They serve as technical experts on all health and safety-related issues and they bear the primary responsibility for overseeing the day-to-day administration of regional health and safety programs. For example, SHEMP Managers coordinate health and safety training, oversee the administration of personal monitoring programs, and maintain health and safety records. The SHEMP Manager must also assist the Removal Manager in customizing the manual and ensuring that it is reviewed/updated annually.

HSPCs assist Removal Managers in executing their health and safety responsibilities. HSPCs (typically OSCs with collateral duties) serve as the main point of contact on all health and safety-related issues for EPA's emergency responders. In this role, HSPCs work with SHEMP Managers to assist emergency responders in (1) interpreting or clarifying EPA and OSHA health and safety requirements, (2) identifying and resolving critical health and safety issues at complex sites, and (3) providing consultation to OSCs on health and safety issues. The HSPC facilitates communication between the managers who administer regional health and safety programs (e.g., Removal Managers and SHEMP Managers) and the emergency responders who are subjected to those programs. HSPCs may assist in coordinating or delivering training for emergency responders and in maintaining certain health and safety records, such as employee training certificates. HSPCs may also be expected to play a role in (1) ensuring that health and safety equipment is maintained and stored properly; (2) developing health and safety protocols; (3) customizing, reviewing, and updating the manual; and (4) conducting periodic field safety audits.

Emergency Responders must maintain a high level of preparedness, satisfy their training requirements, and participate in appropriate health and safety monitoring programs. OSCs must conduct initial site hazard evaluations, develop effective site-specific HASPs, and ensure the safety of other workers and visitors at the site. OSCs may serve as Onsite Safety Officers unless this responsibility has specifically been delegated to another person.

5.2 Pre-Entry Briefings

In accordance with 29 CFR 1910.120(b)(4)(iii), pre-entry briefings ("tailgate meetings") must be conducted in the field at the start of each shift. Discussion topics and attendance should be documented. A training roster or sign-in sheet may be used for this purpose (A pre-entry briefing template can be found in the "Forms" section of the manual's website). Documentation should be retained in site files.

These formal but brief meetings should be held at the start of each work shift to alert emergency responders of the hazards associated with a particular site. All personnel who may enter a site must attend the briefings, which must identify the technical work objectives for the shift and cover the most significant safety and health issues that may be encountered. At least once a week during a field activity, the pre-entry briefing must also include a review of other site-specific HASP issues, such as evacuation procedures and protocols for handling onsite injuries. The information provided during pre-entry briefings is also covered by ICS operations briefings.

5.3 Tracking the Completion of Safety and Health Training Requirements

The manual's chapters list safety and health training requirements that emergency responders must complete before performing work in the field. Upon completing a training course, employees must obtain a training certificate (or an equivalent form of documentation) certifying that they have successfully completed the training. They must retain a copy of this documentation in their files and they must also

present a copy of the documentation to the SHEMP Manager or HSPC (or another designated person), who in turn will ensure that the training is documented in the Agency's Field Readiness Module (FRM).

The SHEMP Manager (or another designated person) in coordination with the HSPC (or another designated person) must also:

- Keep track of which emergency responders have met their training requirements.
- Contact emergency responders who have not completed necessary training to inform them that they need to do so and to alert them of the next available training session.
- Alert the Removal Manager (or another designated person) if an employee has not met a training requirement so that he or she can facilitate completion of proper training and prevent employees from performing field work until they are adequately trained.

5.4 Recordkeeping

The majority of documents generated during site field activities will be retained in site files. However, EPA organizations must refer to the recordkeeping section of each chapter to determine whether other recordkeeping requirements exist for specific health and safety documents.

6.0 INTERNAL PROGRAM REVIEWS AND FIELD AUDITS

EPA organizations must perform an internal program review annually and conduct field audits.

6.1 Internal Program Reviews

Once a year, representatives from the Core National Approach to Response (NAR) audit team evaluate each EPA organization to examine the elements of the organization's health and safety program. The Agency will continue to develop new safety and health criteria that will be used during the Core NAR audit. These criteria, which are posted under the "Administrative Documents" section of the manual's website will be updated as revisions are made to the Agency's emergency responder safety and health programs.

To prepare for the annual Core NAR audit, the SHEMP Manager (or another designated person) should collaborate with the Removal Manager (or another designated person) and the HSPC (or another designated person) to download the most current version of the criteria, use them to assess their organization's performance, and retain a copy of the results. If program deficiencies are identified, the Removal Manager (or another designated person) and the SHEMP Manager (or another designated person) must take appropriate corrective actions to address them. The internal review should be conducted in advance of an organization's scheduled annual Core NAR audit, as the internal review is intended to serve as a pre-audit, preparatory activity.

6.2 Field Audits

Formal health and safety audits should be performed at field sites periodically. **The audits are intended to be helpful and consultative rather than punitive, and are meant to promote self-awareness and self-correction regarding health and safety matters**. The "Training and Tools" section of the manual's website provides sample field review checklists that EPA organizations may use.

The Removal Manager (or another designated person) is responsible for ensuring that field audits are performed each year on at least 10 percent of sites that involve two or more weeks of field activity. In addition, assuming resources are available, the Removal Manager (or another designated person) must strive to ensure that field-level auditing support is made available to any emergency responder who requests a health and safety audit.

The Removal Manager (or another designated person) must arrange for field audits to be performed by the HSPC, the SHEMP Manager (or another designated person), who will do the following during the field audit: (1) review the HASP, (2) document any actual or possible deficiencies, and (3) determine whether emergency responders are taking the necessary corrective actions to address the deficiencies and protect worker health and safety. The HSPC (or another designated person) will retain a copy of the audit report, submit a copy to the site file, and forward copies to designated managers.

APPENDIX A

Introduction: Designation of Roles and Responsibilities

A-1 **Task Table for Implementing the Introduction**

A-2 **List of Region 4 Emergency Response Health and Safety Program Personnel**

INSTRUCTIONS FOR USERS

Appendix A provides a place for users to insert organization-specific information.

Appendix A-1 presents a list of general activities that must be performed to support any health and safety program, as well as tasks associated with implementing the manual, tracking health and safety training requirements, and performing program-level reviews and field audits. Tasks are listed in rows. EPA position titles (or roles) are listed in columns. Each task has been assigned to a default position. For some of the tasks, check marks have been placed in two or more columns to indicate that more than one person is responsible for that task. **Please note that users can re-delegate tasks.**

Users must do the following to customize Appendix A-1:

- Fill in the background information requested at the top of page A-3. For example, indicate when the table is being updated and who is doing the updating.
- Fill in actual names under the position titles in Appendix A-2.
- Add additional key players to the table (if necessary). *Note: The chapter authors have already provided a placeholder to add a new position, as the last column is labeled "Other." Users should customize this column to identify the position title (and name) of any additional key player assigned responsibility to implement the manual. Users can insert more columns to include additional key players (if necessary).*
- Determine whether any of the recommended task assignments must be delegated to another person. If so, move the check marks to re-assign the task.
- Ensure that each task has been assigned.

ATTENTION OLEM Special Teams and HQ Users: The tasks and position titles that appear in Appendix A-1 have been written with regional audiences in mind. OLEM special teams and HQ should modify the language that appears in the rows and the column headers to reflect the needs of their organization.

APPENDIX A-1
Task Table for Implementing the Introduction

This table has been customized for Region 4.
Last updated on: March 2, 2017.
Updated by: Kevin Eichinger.

TASKS ▼ / ROLES ►	Who Is Responsible for Each Task or Action?				
	Removal Manager	SHEMP Manager	Health and Safety Program Contact	Emergency Responders	Other
	See Appendix A-2 for the names of personnel that fill these roles.				
General Tasks					
1. Ensure that the procedures outlined in EPA's Emergency Responder Health and Safety Manual are being followed by all responsible parties. Also, support any health and safety programs that the SHEMP Manager (or another designated person) establishes.	✓				
2. Authorize the use of resources to support health and safety training, equipment maintenance, and other activities related to your organization's health and safety program.	✓				
3. Ensure that emergency responders have fulfilled all of their health and safety requirements before allowing them to perform work in the field.	✓				
4. Appoint a regional HSPC.	✓				
5. Serve as your organization's technical expert and point of contact on all health and safety issues for emergency responders.		✓	✓		
6. Assume primary responsibility for overseeing the day-to-day administration of your organization's health and safety programs.		✓			
7. Make training available to emergency responders on how to use EPA's Emergency Responder Health and Safety Manual (see Section 4.2).		✓	✓		
8. Assist emergency responders in (1) interpreting or clarifying OSHA health and safety standards and EPA policy and guidelines, (2) identifying and resolving critical health and safety issues at complex sites, and (3) providing consultation to OSCs on health and safety issues.		✓	✓		
9. Ensure that health and safety equipment is maintained and stored properly.			✓		
10. Assist in developing organization-specific health and safety protocols, and ensure that they meet the minimum requirements stated in EPA's Emergency Responder Health and Safety Manual.			✓		
11. Perform initial site hazard evaluations and develop site-specific HASPs.				✓	
12. Assume responsibility for worker health and safety concerns at response sites.				✓	
13. Ensure that (1) pre-entry briefings are held at the start of each shift, (2) all onsite personnel attend, (3) discussion topics and attendance are documented, and (4) documentation is retained in site files.	✓		✓	✓	

TASKS ▼ / ROLES ►	Who Is Responsible for Each Task or Action?				
	Removal Manager	SHEMP Manager	Health and Safety Program Contact	Emergency Responders	Other
	See Appendix A-2 for the names of personnel that fill these roles.				
Tasks Associated With Implementing EPA's Emergency Responder Health and Safety Manual					
14. Ensure that the manual's chapters are customized with organization-specific information and that all relevant stakeholders receive customized versions of each chapter.	✓	✓	✓		
15. Ensure that your organization's customized chapters are posted (as PDFs) to the "Customized Documents" section of the manual's website.	✓	✓	✓		
16. Develop a Field Guide for the manual. Ensure that the Field Guide is provided to all emergency responders and that it remains current.			✓		
17. Review and update your organization's chapters annually: • Check the "Manual (Master Version)" section of the manual's website to find out whether any of the manual's chapters have been modified. If so, re-enter organization-specific information into the new versions of the chapters. If not, revisit the most recent version of your organization's customized chapters to determine whether the organization-specific information requires updating. • Ensure that any substantive changes are communicated to all relevant EPA managers and staff.	✓	✓	✓		
18. Participate in the Tier 1 Group and collect feedback from emergency responders on the manual's content and functionality. If necessary, propose changes to the manual.		✓	✓		
Tasks Associated With Tracking Training Requirements (Section 5.3)					
19. Retain copies of documents that certify the completion of safety and health training requirements.				✓	
20. Ensure that training requirements are tracked in the FRM and that the Removal Manager or supervisor is aware of which employees have/have not completed their training requirements. Contact emergency responders who have not completed the necessary training to inform them that they need to do so and alert them of the next available training session.	✓	✓	✓		
Tasks Associated With Internal Program Reviews and Field Audits (Section 6.0)					
21. On an annual basis, download the Core NAR criteria (available on the "Administrative Documents" section of the manual's website) that the Agency uses to assess how well EPA organizations are implementing emergency responder safety and health programs. Use the criteria to assess performance, retain a copy of the results, and correct any deficiencies that are identified. *(Note: This internal review should be conducted in advance of your organization's scheduled annual Core NAR audit, as the internal review is intended to serve as a pre-audit, preparatory activity.)*	✓	✓	✓		

TASKS ▼ / ROLES ►	Who Is Responsible for Each Task or Action?				
	Removal Manager	SHEMP Manager	Health and Safety Program Contact	Emergency Responders	Other
	See Appendix A-2 for the names of personnel that fill these roles.				
22. Ensure that your organization is meeting its obligation to perform field audits each year on at least 10 percent of sites that involve two or more weeks of field activity. In addition, if resources are available, ensure that field-level auditing support is made available to emergency responders who request health and safety evaluations at their site.	✓				
23. Perform field audits (including a HASP review) to ensure that health and safety issues are being adequately addressed. Retain copies of audit reports, submit copies to the site file, and forward copies to designated managers.		✓	✓		
24. Correct any deficiencies identified during field audits.				✓	

APPENDIX A-2

List of Region 4 Emergency Responder Health and Safety Personnel

Health and Safety Program Management Personnel	
Removal Manager:	James Webster, 404-562-8769
Immediate Supervisors:	Jim McGuire, 404-562-8911 Tony Moore, 404-562-8756 Matt Taylor, 404-562-8759
Safety, Health and Environmental Management Program Manager (SHEMP):	Barbara Scott, 404-562-8033
Health and Safety Program Contact (HPSC):	Kevin Eichinger, 404-562-8268
Training Data Managers:	Chuck Berry, 404-562-8278
Training Coordinators:	Chuck Berry, 404-562-8278
Physicians:	FOH, 404-562-7551
Equipment Warehouse Managers:	Greg Harper, 404-562-8322
Vehicle Manager:	Tim Neal, 404-562-8796
Radiation Safety Officer (RSO):	
Workers Compensation Coordinators:	Delphine Williams, 404-562-81498
Other:	

Emergency Responders			
1.	Gary Andrew	26.	Chris Tripp
2.	Dave Andrews	27.	Bryan Vasser
3.	Chuck Berry	28.	Ted Walden
4.	Jason Booth	29.	Carter Williamson
5.	Karen Buerki	30.	
6.	Terrence Byrd	31.	
7.	Kevin Eichinger	32.	
8.	Brian Englert	33.	
9.	Serdar Ertep	34.	
10.	Ben Franco	35.	
11.	Jordan Garrard	36.	
12.	Perry Gaughan	37.	
13.	Greg Harper	38.	
14.	Matt Huyser	39	
15.	Rick Jardine	40.	
16.	Geoie Krull	41.	
17.	Tim Neal	42.	
18.	Jose Negron	43.	
19.	Subash Patel	44.	
20.	Ken Rhame	45.	
21.	Chris Russel	46.	
22.	Steve Spurlin	47.	
23.	Terry Stilman	48.	
24.	Courtney Swanson	49.	
25.	Terry Tanner	50.	