

DOSH DIRECTIVE

Department of Labor and Industries
Division of Occupational Safety and Health
Keeping Washington safe and working

12.70

Emergency Response Technical Specialist

Date: March 22, 2019

I. Purpose

This Directive establishes procedures related to best practices when DOSH staff are assigned to perform in the roles of Technical Specialists in support of emergency response activities.

II. Scope and Application

This Directive applies to all DOSH operations statewide. This Directive is meant to supplement other directives that cover DOSH staff when working with emergency response operations and organizations.

III. References

- DOSH Directive 1.15, Dual Employers and DOSH Enforcement.
- DOSH Directive 12.75, Emergency Response to Hazardous Substances Releases
- OSHA CPL 02-00-94, OSHA Response to Significant Events of Potentially Catastrophic Consequences
- OSHA Directive HSO-01-00-001, National Emergency Management Plan

IV. Background

During emergencies within the State of Washington, DOSH staff can provide a unique and valuable resource. Current practice during an emergency response is to call DOSH during the recovery phase, if at all. Participating in emergency response activities that increases awareness of DOSH capabilities and builds connections and trust with responder communities, supports the internal DOSH mission to keep Washington safe and working.

Emergency response organizations typically have the means for protecting their workers from foreseeable hazards during emergencies. However, some emergencies overwhelm the response organizations because of the severity of hazards faced, the geographic area, and/or the number of responders involved.

When such overwhelming emergencies occur, DOSH employees can become critical resources to ensure that response and recovery workers are protected during the operations. DOSH employees may assume the role of Technical Specialist after requests are received from OSHA, other Departments within the Washington State government, or local and regional Incident Management Teams (IMTs).

V. Best Practices

- A.** During disaster response and recovery operations, DOSH standards remain in effect and DOSH retains its authority to enforce. Even when on site as part of an enforcement action, existing DOSH guidance precludes DOSH staff from interfering with the Incident Commander (IC). DOSH staff may provide technical assistance within the limits of their expertise and at the request of the IC, but they must not interfere with the incident response or attempt to supersede the IC's authority.
- B.** In cases when DOSH staff are on site because they have been assigned to act in the role of a Technical Specialist, DOSH personnel would be expected to operate in a role similar to DOSH consultation staff. Compliance staff and other DOSH staff can be assigned to provide technical assistance, at the direction of the L&I Assistant Director for Occupational Safety and Health (Assistant Director), particularly when they have skills that would be beneficial to the response.

Because of the potential to undermine an employer's responsibility, DOSH staff must have specific approval from the Assistant Director to accept the role of ICS safety officer in any response.

- C.** All response organizations are required to use the Incident Command System (ICS) to manage response operations. By working in a technical assistance and support role within the ICS, DOSH staff can help to ensure the protection of response and recovery workers. DOSH can become part of the management of safety and health operations by taking part in the hazards assessment process, the development of site-specific Health and Safety Plans (HASPs), training activities, and other safety operations supporting the IC, Unified Command, or Incident Safety Officer.
- D.** Even though DOSH may be providing supplemental assistance to the Incident Command staff, the individual employers remain responsible for the health and safety of their employees (e.g., the response and recovery workers and contractors that they hire). DOSH may need to communicate clearly to the Incident Command staff that even though DOSH is providing technical assistance, employers must comply with applicable DOSH standards.
- E.** Whenever DOSH is involved in a response, the ultimate goal is to assist the Incident Command staff to get to a level where they can independently perform safety and health operations without further assistance from DOSH. This includes the Incident Command staff having the resources to monitor operations to ensure compliance with established protocols.
- F.** Although DOSH works within the ICS, this does not preclude DOSH from using its authority to investigate complaints, referrals, fatalities, and catastrophes, as long as it is done in a manner that does not reduce or interfere with the effectiveness of the emergency response. In the event where DOSH staff identify a hazard representing an immediate danger, the resources within the IMT, including the IC and/or Incident Safety Officer, should be notified immediately to address the hazard within existing risk management priorities.

VI. Guidance for Beginning DOSH's Support of Response Operations**A. EOC Activation.**

Either before or in the immediate aftermath of a disaster, emergency management organizations may activate their Emergency Operations Centers (EOCs). Any request for assistance in the initial response and recovery operations should be immediately forwarded to the Assistant Director for evaluation and assignment. If DOSH assistance has been requested, in coordination with Central Office, DOSH Regions should contact and/or deploy staff to the EOCs to take part in meetings and gain situational awareness. In cases where an Incident Command Post (ICP) has been established and DOSH assistance has been requested, only at the direction of and in coordination with Central Office, should DOSH Regions contact and/or deploy staff to the ICP.

B. Initial Check-In.

Before coming directly onto the incident site, the DOSH representative needs to check in with the ICP. During this check-in, the representative should find out the following information:

1. Ask the Incident Commander or Liaison Officer for the identity of the Incident Safety Officer.
2. Determine how Safety is being organized (e.g., what other employers are taking part in hazardous operations and if they are represented by this Incident Safety Officer). The Incident Safety Officer may be in charge of safety, but each employer retains their responsibility for ensuring the protection of the workers they employ/control. This may be viewed in relation to DOSH Directive 1.15, Dual Employers and DOSH Enforcement.
3. Identify a briefing/meeting schedule for the Incident Command staff. Determine which meetings are important to attend. In addition, determine a reporting schedule for submitting safety and health content to DOSH Regional Management and to the personnel in charge of developing the Incident Action Plans (IAPs) used by the IC to manage the situation. DOSH should work with the Incident Command staff to incorporate a "Safety Message" into the Incident Action Plan.

Other responding governmental organizations are also likely to have safety personnel involved in the response. Depending on the number of organizations involved in the response, it may be appropriate to coordinate technical assistance provided to the Incident Safety Officer and other Incident Command Staff.

NOTE: All responding governmental organizations (e.g. local utilities) are typically not represented by safety staff. Additional coordination may be necessary to reach these organizations. In addition, Incident Command staff responsible for volunteer coordination can also be contacted to ensure that volunteers are receiving the same protection as employees.

C. Health and Safety Plans (HASPs).

One request of DOSH by the incident command staff may be to assist with the development of the Health and Safety Plans (HASPs). The request may be for a general, incident-wide HASP, or a HASP for a specific operation. In the early phases of the response, the following basic information is used to establish an incident-wide HASP:

- What operations are taking place?
- What occupations are involved in the operations?
- What tasks are being performed?
- What employers are performing the tasks?
- What are all the hazards associated with these tasks? What is the process for identifying and assessing hazards?
- Does the Safety Officer need a sampling plan?
- What controls are necessary to protect the workers (administrative/engineering controls, training, PPE)?

Once the HASP has been established and approved, DOSH representatives may need to communicate with the employers/contractors to ensure that they understand the expectations of the HASP and who is monitoring “compliance” with the HASP.

Besides assisting with general incident-wide HASPs, DOSH staff may also assist with operation-specific HASPs and/or Job Hazard Analyses (JHAs). These operation-specific HASPs/JHAs can focus on specific employers and tasks to provide precise instruction for completing the operation.

D. Situation Reports.

When working on an emergency site in the role of providing technical assistance, DOSH staff are advised to write Situation Reports, providing basic information on the activities on site, and the actions taken by DOSH staff. The timing, content, and necessity to submit such reports should be discussed with the Regional Management, at the direction of, and in coordination with, Central Office.

VII. Model Training Program**A. DOSH staff who serve as Technical Specialists must:**

- Have current knowledge in their field regarding safety and health practices relating to the hazards on site;
- Have knowledge of the ICS and how they relate to it; and
- Understand the use and care of any personal protective equipment (PPE) required on site.

B. Additional training classes that lead to a better understanding of emergency response operations include: ICS 100, ICS 200, ICS 300, ICS 400, NIMS 700, NIMS 800, OSHA 7600 (Disaster Site Worker) and E/L 954 (NIMS All Hazard Position-Specific Safety Officer Training).

- ICS 100 and 200 are required training classes for all DOSH field staff, and they provide a basic understanding of the ICS.
- NIMS 700 and 800 cover information on disaster response at the federal level.
- ICS 300 and 400 provide a more advanced understanding of the ICS through activities and exercises. These classes are taught through local emergency management organizations and provide an opportunity to meet local responders and learn more about incident management teams (IMTs), which can lead to opportunities for staff to participate in tabletops and full-scale exercises. These courses also cover use of FEMA’s standardized forms that provide the structure for communication during an incident. Regional management approval is required to participate in training with an IMT.

See [Appendix A](#) below, for more information on the model training program classes recommended to prepare DOSH staff for acting in the capacity of emergency response technical specialists.


VIII. Who to Contact

If DOSH staff have questions or need additional guidance or interpretive assistance, they are encouraged to contact Technical Services, and request information from the individual assigned to provide guidance on the emergency response standard.

IX. Review and Cancellation

This Directive will be reviewed for applicability two years from the issue date, and will remain effective unless superseded or canceled.

Approved: _____



Anne F. Soiza
L & I Assistant Director
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[[Appendix A](#) is attached below]

APPENDIX A

List of Model Training Program Classes

- ICS 100 – Introduction to the Incident Command System¹
- ICS 200 – Incident Command System for Single Resources and Initial Action Incidents¹
- NIMS 700 – Introduction to the National Incident Management System¹
- NIMS 800 – Introduction to the National Response Framework¹
- OSHA 7600 – Disaster Site Worker²
- ICS 300 - Intermediate Incident Command System for Expanding Incidents³
- ICS 400 - Advanced Incident Command System for Command and General Staff³
- E/L 954 - NIMS ICS All-Hazards Safety Officer⁴

Notes:

¹On-line classes available through FEMA.

²One-day class is taught by DOSH Internal Training Staff and provides an introduction to the way in which DOSH staff operate within the Incident Command System.

³Two- and three-day classroom training is available through County Emergency Management Offices; Taught by Emergency Response Personnel associated with Incident Management Teams. Additional training is available through partnerships with IMTs. Approval to partner with IMTs is through your DOSH regional management.

⁴Four-day classes are available through FEMA-sponsored training agreements. Contact DOSH Internal Training for assistance with enrollment.