



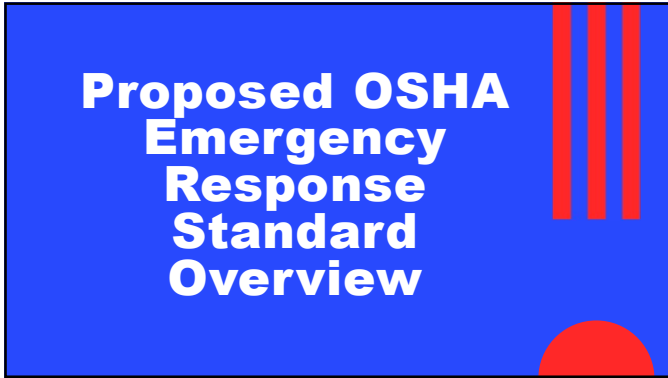
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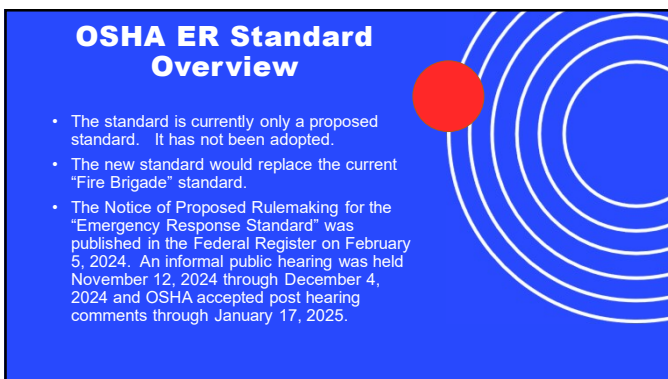
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OSHA ER Standard Overview

- This proposed updated standard would issue hundreds of new requirements which would impact FDs, EMS, tech rescue teams, and industrial ER teams.
- The standard would apply to full-time personnel and volunteers. This includes industrial responders who do not perform ER as the primary job.
- The standard would require ESOs and WEREs to provide protection for skilled workers who support their activities.
- The standard would exclude activities covered by 1910.120 (HAZWOPER) and 1910.146 (Confined Space)

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ESO and WERT Establishment and Organization

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Establishment and Organizational Requirements

- Development and implementation of a written emergency response plan
- Conduct a community / facility vulnerability assessment (VA)
- Specify the equipment and resources needed to mitigate incident identified in the VA.
- Establish and document:
 - The types and levels of response it intends to perform
 - Establish tiers of responder / team member responsibilities, qualifications, and capabilities for each type and level of response

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Establishment and Organizational Requirements

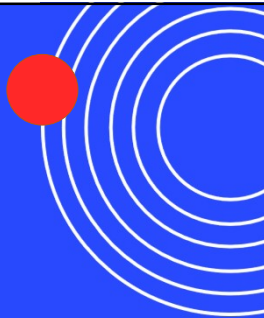
- Identify and document what emergency services the ESO/WERT is unable to provide and develop mutual aid agreements with other organizations.
- Emergency response plan documentation
 - Maintain 5 years of documentation
 - Notify personnel of all changes
 - Make current and previous plans are available to responders, their representatives and OSHA personnel



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ESO and WERT Organization Implementation Suggestions

- Develop a "concept of operations" document that includes the following:
 - An overview of the community/facility vulnerability/hazard assessment
 - An overview of how your organization will respond to the identified hazards
 - Level of response you will provide to identified hazards
 - Mutual aid plan for hazards your organization is unable to mitigate
 - Train your personnel on your concept of operation process



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ESO and WERT Responder Participation



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Responder Participation Requirements

- Establish and implement process to:
 - Involve responders in developing and updating the ERP
 - Implementing and evaluating the ERP
 - Involve responders in review and change process
- Request input from responders regarding changes to their own facilities.
- Establish and implement process to:
 - Involve responders in health and safety inspections of their own facilities
 - To encourage responders to report safety and health concerns
 - Post procedures for reporting safety concerns in a conspicuous place.

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Responder Participation Implementation Suggestions

- Use "Health & Safety Committee" type organization to coordinate the implementation of all proposed OSHA standard programs
 - Committee should include a cross section of all organizational personnel – line firefighters/responders, company officers, chief officers, and support personnel
 - Committee members should be encouraged to solicit input from other department personnel.
- All products should be shared with organization membership and they should be encouraged to provide constructive criticism.
- Completed/approved products should be readily available for membership review

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ESO and WERT Risk Management Plans

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Risk Management Plan Requirements

- Develop and implement a written comprehensive risk management plan based on the type and level of services provided
- Review the plan no less than annual and update as needed
- Plan must cover the following:
 - Risk at their own facilities
 - Training
 - Vehicle operations – emergency and non-emergency
 - Operations at emergency scenes
 - Non-emergency services and activities
 - Activities that lead to exposures to combustion products, carcinogens and other health hazards

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Risk Management Plan Requirements

- Plan must include the following:
 - Identification of anticipated hazards
 - Evaluation of likelihood of occurrence of hazards
 - Priorities for action based on hazard severity
 - Risk control techniques for elimination of hazards
 - Plan for post-incident evaluation of risk control techniques
 - Policy for extraordinary situations for situations where a responder is permitted to rescue a person in imminent peril
- Specific plan components must include:
 - PPE hazard assessment – 1910.132
 - Respiratory protection program – 1910.134
 - Infection control program – 1910.1030

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Risk Management Plan Implementation Suggestions

- No need to re-invent the wheel. Obtain a copy of an established fire service risk management plan and modify the plan to fit your organization needs.
 - Policy for extraordinary situations for situations where a responder is permitted to rescue a person in imminent peril
- Develop specific plans / SOGs. Again no need to re-invent the wheel
 - PPE hazard assessment – 1910.132
 - Respiratory protection program – 1910.134
 - Infection control program – 1910.1030

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ESO and WERT Responder Medical Evaluation Program



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Responder Medical Evaluation Plan Requirements

- ESO/WERT must establish minimum medical requirements based on type and level of service each responder will provide.
- Confidential medical records for each responder must be maintained and made available (OSHA 1910.1020)
 - Duty restrictions
 - Occupational injuries/illnesses
 - Exposures to products of combustion, toxic substances, infectious diseases, etc.



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Responder Medical Evaluation Plan Requirements

- ESO/WERT must establish a medical evaluation program to include the following:
 - Evaluation to ensure responder can perform assigned duties
 - Evaluation by health care professional (PLHCP) prior to performing response duty (at no cost)
 - Additional surveillance if routinely exposed to products of combustion (more than 15 times per year without respiratory protection)
 - Evaluation cardiac, respiratory, and musculoskeletal systems, spirometry and other tests deemed appropriate by PLHCP
 - Annual evaluation of responder to ensure they are physically capable of performing their assigned duties.
 - Provide behavioral health and wellness resources at no cost



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Responder Medical Evaluation Plan Requirements

- The ESO / WERT must provide behavioral health and wellness resources at no cost.
- The ESO/WERT must establish and implement a health and fitness program that allows responders to safely perform their assigned duties
 - Individual assigned to oversee program
 - Conduct fitness assessments of responders at least once every 3 years
 - Provide exercise training during working hours
 - Health promotion education and counseling for all responders



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Responder Medical Evaluation Plan Implementation Suggestions

- Investigate and establish relationship with existing medical / health and wellness providers
 - Local hospitals / clinics / occupational health providers
 - Gyms / Wellness providers / personal trainers
 - Insurance resources
- Consider partnering with other area organizations to provide cost effective evaluation programs
- Develop and implement an individual personal health file system



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ESO and WERT Responder Training Program



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Responder Training Program Requirements

- The ESO / WERT must develop and implement a training program that includes:
 - Minimum training requirements for responders based on activities being performed
 - Initial and ongoing training
 - Restrict activities of new responder until they can demonstrate skills to safely complete assigned tasks
 - Specific training on organization risk management plan
 - Specific training on organization safety and health policy and SOGs
 - Specific training on selection, use, limitations, maintenance and retirement of PPE used
 - Incident management system training
 - Specific training on accountability, evacuations, equipment failure and dangerous situations and events
 - HAZWOPER and Tech Rescue awareness level

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Responder Training Program Requirements

- The ESO / WERT must develop and implement a training program that includes:
 - Training at least equivalent to NFPA 1001 and NFPA 1407 (RIT) for personnel conducting interior structure firefighting
 - Training at least equivalent to NFPA 1002 for personnel operating apparatus
 - Training at least equivalent to NFPA 1021 for personnel serving as a crew leader or officer
 - Training at least equivalent to NFPA 1140 for personnel conducting wildland firefighting
 - Training at least equivalent to NFPA 1006 for personnel conducting technical rescue operations
 - EMS certification or license for the level of service provided
 - Annual skill checks to ensure proficiency

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Responder Training Program Implementation Suggestions

- Develop a documented training plan for your organization
 - Clearly define mandatory training requirements for each specific level of organization personnel
 - Reference training requirements against recognized standards – NFPA / state training programs
 - Incorporate health and safety training topics into training classes
 - Place focus on performing "the basics" well
- Develop annual skill checks to ensure proficiency
- Develop document process to verify compliance with training plan

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ESO and WERT Facility Preparedness



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ESO / WERT Facility Requirements

- The ESO / WERT must ensure facilities comply with the following:
 - Exit routes and emergency planning as outlined in OSHA 29 CFR 1910 Subpart E
 - Facilities for the decontamination, cleaning, and storage of PPE
 - Fire detection, suppression and alarm systems are installed, tested and maintained in accordance with 29 CFR 1910 Subpart L
 - Ensure hardwired smoke detectors and carbon monoxide alarms in sleeping quarters
 - Prevent exposure to exhaust emissions in sleeping and living areas
 - Ensure contaminated PPE is not worn in sleeping and living areas
 - Establish requirements for fire poles, slides and chutes



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ESO / WERT Facility Implementation Suggestions

- Conduct and document regular facility safety audits
- Develop and post a facility emergency plan
- Establish and maintain documentation for facility system inspection and maintenance
- Establish a facility cross / decontamination plan



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ESO and WERT Equipment and PPE Requirements



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ESO / WERT Equipment and PPE Requirements

- The ESO / WERT must ensure equipment and PPE comply with the following:

- Ensure the equipment received is safe for use prior to using equipment.
- Inspect, functionally test and service test equipment at least annually, in accordance with manufacturer's instructions and as necessary to ensure equipment is in safe working order.
- Immediately remove any defective equipment from service.
- Provide PPE that is properly fitted and designed to protect responders from the hazards they face.
- PPE complies with 29 CFR 1910 – Subpart I
- PPE complies with the requirements of the existing NFPA standards



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ESO / WERT Equipment and PPE Requirements

- The ESO / WERT must ensure equipment and PPE comply with the following:

- Ensure responders properly uses and wears PPE when exposed or potentially exposed to hazards for which it is provided
- Ensure PPE is decontaminated, cleaned, inspected and maintained in accordance with manufacturer's instructions
- Remove defective PPE from service immediately
- Ensure that any personally owned responder PPE meets the requirements of this standard
- Contaminated PPE and equipment be gross decontaminated or separately contained before leaving the scene
 - Ensure responders are not exposed to contaminated gear in the passenger compartment of vehicles.



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ESO / WERT Equipment / PPE Implementation Suggestions

- Develop specific SOGs that clearly outline PPE program operations
- Incorporate PPE training into regular training sessions
- Incorporate PPE manufacturer training into PPE program
- Establish documentation program for PPE inspection and maintenance



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ESO and WERT Vehicle Preparedness and Operation



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ESO / WERT Vehicle Operation Requirements

- The ESO / WERT must ensure vehicles and vehicle operations comply with the following:
 - Ensure vehicles are inspected, maintained and repaired in accordance with manufacturer instructions
 - Ensure that vehicles with safety deficiencies are immediately removed from service
 - Ensure that each vehicle has a seat belt or vehicle safety harness for each riding position
 - Ensure that aerial ladders and apparatus pumps be inspected, maintained and service tested at least equivalent to NFPA 1910.
 - Ensure that vehicle operators complete an operator training program and operated in accordance with established SOPs
 - Ensure personnel are wearing seat belts prior to the vehicle moving and do not remove belts until the vehicle has stopped



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ESO / WERT Vehicle Operation Requirements

- The ESO / WERT must ensure vehicles and vehicle operations comply with the following:
 - Ensure personnel providing medical care in moving vehicle are secured by a seat belt or vehicle safety harness
 - Ensure personnel in designated stand up pump and roll vehicle locations are secured by a vehicle safety harness
 - Ensure policies/procedures are developed to ensure the safety of personnel when it is not feasible for personnel to wear a seat belt
 - Reloading hose
 - Parades
 - Ensure policies/procedures for use of POVs during operations
 - Tools carried on apparatus are stored with effective latching mechanisms

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ESO / WERT Vehicle Ops Implementation Suggestions

- Establish a documented apparatus and equipment inspection and maintenance program
 - Define process for removing apparatus / equipment from service
 - Define inspection and maintenance intervals
 - Define inspection and maintenance processes
 - Who will perform
 - Required training
 - Define inspection and maintenance documentation
- Establish a comprehensive emergency vehicle driving SOG and training program

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ESO and WERT Pre-Incident Planning

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ESO / WERT Pre-Incident Planning Requirements

- The ESO / WERT must develop a pre-incident planning program that includes the following:
 - Develop pre-incident plans (PIPs) for locations/facilities based on the vulnerability assessment conducted. It does not require PIPS for every location/facility.
 - All facilities which fall under Emergency Planning and Community Right to Know requirements must be pre-planned
 - The PIPs should include:
 - Locations of unusual hazards (haz mat)
 - Locations of fire protection systems
 - Details commensurate with the facility's complexity and hazards
 - Actions to be taken if the scope of the incident is beyond the level of the response organization

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ESO / WERT Pre-Incident Planning Requirements

- The ESO / WERT must develop a pre-incident planning program that includes the following:
 - Personnel responsible for developing the PIPs must be trained to ensure they collect and include the appropriate information
 - PIPs must be disseminated as needed and available to responders operating at emergency scenes.
 - PIPs should be reviewed annually and updated as needed.

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ESO / WERT Pre-Incident Planning Implementation Suggestions

- Establish a pre-incident planning program
 - Prioritize high hazard locations within the response district
 - Specific actions if incidents are beyond the capabilities of the organization
 - Review and update process
- Incorporate review of pre-incident plans into the organization training program

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ESO and WERT Incident Management System



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ESO / WERT IMS Requirements

- The ESO / WERT must develop and implement an incident management system (IMS) to manage emergency response incidents.
 - Ensure IMS consists of generally accepted collaborative components outlined in NIMS
- Ensure that in the absence of a dedicated safety officer, the IC will oversee incident safety.
- Ensure that personnel filling the IC role has training and authority to perform IC duties.



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ESO / WERT IMS Implementation Suggestions

- Develop a organization specific SOG on incident management operations
- Conduct position specific IMS operations
 - General organization training
 - Incident commander level training
 - Safety Officer level training



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ESO and WERT Emergency Incident Operations



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ESO / WERT Emergency Incident Operations

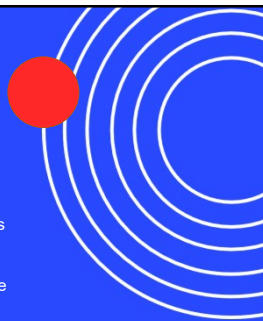
- The ESO / WERT must implement an incident management system (IMS) at incidents and every incident has an IC/UC.
- A process to oversee incident safety is implemented and/or a safety officer is assigned at incidents.
- The ESO/WERT will rotate or replace responders during complex/extended operations.
- The IC will conduct a comprehensive ongoing size up that places life safety as the highest priority.



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ESO / WERT Emergency Incident Operations

- The ESO / WERT will ensure the IC develops an incident action plan that prioritizes life safety. The IAP is not normally formal but developed through a template or checklist.
- The IC will ensure control zones (no-entry, hot, warm and cold) are established and communicated to all responders.
- The ESO / WERT will ensure 2 in, 2 out rule is used for all operations in IDLH atmospheres.
- The ESO / WERT will ensure that there is adequate dispatch and monitoring of on-scene radio communications by the dispatch center.



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ESO / WERT Emergency Incident Operations

- The ESO / WERT will ensure that there is effective communication between responders and the IC.
- The ESO / WERT will ensure that there is effective communication between mutual aid responders and the IC.
- The ESO / WERT will ensure that a personal accountability system is implemented at all incidents.
- The ESO / WERT will implement a rapid intervention crew at each structure fire were responders are operating in an IDLW environment.

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ESO / WERT Emergency Incident Operations

- The ESO / WERT will ensure that medical monitoring and rehab procedures are implemented.
- The ESO / WERT will ensure that traffic safety procedures are implanted.

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ESO / WERT Emergency Incident Operations Implementation Suggestions

- Establish organization specific SOGs on key topics.
- Develop and implement use tactical worksheets / incident management guides
- Conduct organization specific training on incident operations
 - Incorporate required incident operations into all normal training classes

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ESO and WERT Standard Operating Procedures



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ESO / WERT Standard Operating Procedures

- The ESO / WERT will be required to develop SOPs for emergency events they are likely to encounter.
- The ESO / WERT will be required to develop SOPs that describe actions to be taken when dealing with situations that involve unusual hazards.
- The ESO / WERT will be required to develop SOPs that address how responders are to operate at incidents that are beyond the capability of the organization.



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ESO / WERT Standard Operating Procedures

- The ESO / WERT will be required to develop specific SOPs for the following operations:
 - Protecting members from contaminants and decontamination
 - Emergency vehicle operations
 - Standard protocols and terminology for radio communications
 - Operating in vacant or unsafe structures
 - Maintaining accountability and coordinating evacuation
 - Mayday situation response
 - Medical monitoring and rehab
 - Operating at incidents on or adjacent to roadways
 - Operating at incidents that are primarily law enforcement related
 - Conducting non-emergency services



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ESO / WERT SOPs Implementation Suggestions

- Develop organization specific SOGs on required topics
 - Use of other organization SOGs can be considered as long as they are modified to meet individual organization operations
- Conduct regular review and updates of all established SOGs
- Conduct organization specific training on established SOGs
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ESO and WERT Post Incident Analysis

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ESO / WERT Post Incident Analysis

- The ESO / WERT must promptly conduct a post incident analysis (PIA) after significant events to determine the effectiveness of ESO / WERT's response.
- The PIA should include a review of the following elements of the organization's program:
 - Risk Management Plan
 - Incident Management System
 - Pre-Incident Plans
 - Incident Action Plan
 - Standard Operating Procedures
- The ESO / WERT must promptly identify and make changes to the organization's program elements based on the PIA lessons learned

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ESO / WERT PIA Implementation Suggestions

- Develop and formally document a post incident analysis (PIA) program.
 - Establish a standard PIA process such as an incident response scorecard
 - Establish a formal documentation process for PIAs
 - Establish a process to act upon issues identified during PIAs

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ESO and WERT Program Evaluation

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ESO / WERT Program Evaluation

- The ESO / WERT must evaluate the adequacy and effectiveness of the emergency response plan at least annually.
- The evaluation process should include the following elements:
 - Document when the evaluation was conducted
 - Identify any deficiencies discovered
 - Identify and recommended changes
 - Provide a written timeline for correcting deficiencies

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ESO / WERT Program Evaluation Implementation Suggestions

- Conduct annual review of key program elements
- Document review of key program elements
- Document changes that were made as a result of the review

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Summary of Potential Major Impacts

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Potential Major Impacts

- Research / Documentation - Time intensive
 - Organization Emergency Response Plan
 - Response Area Vulnerability Assessment
 - Risk Management Plan
 - Standard Operating Procedures
 - Post Incident Analysis
 - Annual Program Evaluation
- Medical Evaluation Program - \$\$\$
- Training – Time intensive / Potential \$\$\$
 - NFPA related training for level of response
 - Annual skills proficiency training
- Equipment / Apparatus Maintenance and Inspection Program - \$\$\$

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Other Considerations

- Keys to implementation of required programs
 - Involved of organization membership in program development
 - Training of all impacted personnel on program elements
- Documentation of compliance of your established programs will be required
- Attempt to be proactive with your program development
- Establish a proactive relationship with your OSHA regulating agency

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Questions?

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Thank You

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