



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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MEMORANDUM

SUBJECT: Action Memorandum—Tier 3 Approval of Emergency Responder Health and Safety Manual Chapters

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TO: Assistant Regional Administrators, Regions 1-10
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PURPOSE

The purpose of this memorandum is to announce that the following six chapters of EPA's Emergency Responder Health and Safety Manual have been finalized and are ready for implementation:

- Introduction
- Medical Surveillance Program
- Respiratory Protection Program
- Physical Stress Management Program
- Radiation Safety Program
- Bloodborne Pathogen Exposure Control Plan

This memorandum also reinforces the policy established in July 2005, requiring all 10 EPA regions, Headquarters (HQ), the Environmental Response Team (ERT), and the National Decontamination Team (NDT) to implement the chapters—a process that involves adopting the requirements and best practices presented in each chapter and customizing the chapters with organization-specific information.

BACKGROUND

The manual outlines steps that must be taken to protect the Agency's emergency responders (including On-Scene Coordinators [OSCs]) from job-related accidents, injuries, illnesses, and exposures to hazardous materials. The manual is intended to standardize nationally the application of various Occupational Safety and Health Administration (OSHA) standards and ensure a uniform approach to EPA worker safety. The manual adheres primarily to requirements that appear in OSHA standards, EPA policies, and EPA guidance, but in select instances, the manual stipulates requirements that go beyond OSHA to capture best management practices identified through the experience that EPA's emergency response and health and safety programs have gained over the years.

On July 28, 2005, OEM, OSRTI, and SHEMD issued a directive announcing the availability of the first three chapters of the manual and programmatic requirements for the manual. This memorandum supercedes the 2005 directive. Requirements and processes outlined in the 2005 directive have been incorporated into the manual's Introduction Chapter.

SIX CHAPTERS FINALIZED

A Web site has been developed to support the manual, and the six above listed chapters have been posted to that site (see http://www.epaosc.net/_HealthSafetyManual/manual-index.htm).

Three of the chapters (Introduction, Physical Stress Management Program, and Bloodborne Pathogen Exposure Control Plan) are brand new. The other three chapters (Medical Surveillance Program, Respiratory Protection Program, and Radiation Safety Program) were originally released in July 2005 but have undergone extensive revision since that time. Those three chapters have been rewritten, updated, and converted to an improved and shortened format and have been modified in the following ways:

- **Medical Surveillance Program Chapter.** The section on blood storage programs has been deleted. Sections addressing antimicrobial prophylaxis and nerve agent antidote kits have been added. In addition, the chapter now lists the anthrax vaccine as recommended.
- **Respiratory Protection Program Chapter.** Changes introduced to this chapter include incorporating language on the use of alternate respirators and incorporating OSHA's assigned protection factors. In addition, the chapter raises the minimum fit factor to reflect recommendations put forth by the Tier 1 Group—a team consisting of EPA health and safety professionals from the 10 regions, HQ, ERT, and NDT.
- **Radiation Safety Program Chapter.** The section addressing pregnant workers was updated to ensure consistency with the March 2006 version of SHEM Guideline 38. In addition, information was added from the December 5, 2006 "Turn-back Guidance for EPA Personnel Responding To Radiological Emergencies" document. Language was added to clarify the decision-making process for allowing employees to exceed the administrative control level.

All six of the chapters underwent broad review. Comments were solicited from the Agency's Assistant Regional Administrators, Superfund Division Directors, SHEMP Managers, Removal Managers, OSCs, and others. About 100 comments were submitted, all of which were vetted and resolved. A comments matrix has been prepared that explains how each comment was addressed. The matrix is available at <http://www.epaosc.net/HealthSafetyManual/admin.htm>.

The manual is a living document, which means that all of the chapters will be reviewed annually to determine whether modifications are needed. SHEMD/OEM will solicit feedback during the annual review process. In addition, a comments feature has been included on the manual's Web site (<http://www.epaosc.net/HealthSafetyManual/comments.htm>). Comments can be submitted through that Web page at any time. Submitted comments will be compiled and considered during the annual review process.

IMPLEMENTATION

EPA regions, HQ, ERT, and NDT must implement these six chapters as soon as possible. Detailed information about the implementation process and the Agency's expectations are presented in the manual's Introduction Chapter. Implementation will be evaluated, at least in part, through the FY 2009 Core ER process.

NEXT CHAPTERS

Additional chapters are currently in development, and the following four will soon be ready for broad Agency review: Injury, Illness, and Exposure Reporting; Confined Space Safety Program; Chemical and Biological Threat Agents, and Personal Protective Equipment. Notification will be sent when the comment period is open for these chapters.

POINTS OF CONTACT:

Questions about this memorandum or about chapter implementation should be referred to Mark Mjoness (202-564-1976; mjoness.mark@epa.gov) or Cassie Watson (202-564-1652; watson.cassie@epa.gov).

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