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ATTACHMENT 3 – DEP MAJOR INCIDENT RECOVERY RESOURCES

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1 SCOPE

This guidance document defines DEP's approach to managing recovery efforts and resumption of mission-critical operations after a major incident at a DEP facility. Recovery from major emergency incidents is beyond the scope of facility Emergency Action Plans (EAPs), which focus on emergency notifications and facility evacuation. This guidance delineates the steps to be taken in instances in which severe damage and contamination prevent resumption of normal work activities and critical operations.

2 APPLICABILITY

All DEP bureaus and offices shall follow this guideline or a Bureau-specific plan that integrates this approach.

3 DEFINITIONS

Emergency: An unforeseen situation that threatens employees, contractors, visitors to a facility or the public; disrupts or shuts down operations; or causes physical or environmental damage. Emergencies may be natural or man-made and may include the following:

- > Fires:
- > Toxic gas releases;
- > Chemical, petroleum or waste product spills;
- > Explosions;
- > Severe Weather;
- ➤ Medical Emergencies; and
- Workplace violence, internal or external (e.g., bomb threats).

Facility Emergency Coordinator (FEC): Facility staff and alternates, as designated in the Emergency Action Plan (EAP) (i.e., the highest ranking person on the EAP's FEC list who is on duty) to coordinate evacuation and notification in the case of an emergency. The term "Facility Emergency Coordinator" is used in instances in which on-site personnel are not trained in active, hands-on emergency response in accordance with the Occupational Safety & Health Act (OSHA) "HAZWOPER" regulations (29 CFR 1910.120).

<u>Incident Command System (ICS):</u> A standardized on-scene emergency management construct specifically designed to provide for the adoption of an integrated organizational structure that reflects the complexity and demands of single or multiple incidents, without being hindered by jurisdictional boundaries. ICS is the combination of facilities, equipment, personnel, procedures, and communications operating within a common

¹ This guidance does not cover DEP responses to incidents outside of DEP facilities; such responses are conducted under the Citywide Incident Management System (CIMS) when within New York City or under the command of other county or local jurisdictions.

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organizational structure, designed to aid in the management of resources during incidents. It is used for all kinds of emergencies and is applicable to small as well as large and complex incidents. ICS is used by various jurisdictions and functional agencies, both public and private, to organize field-level incident management operations.

Incident Commander (IC): The individual responsible for all incident activities, including the development of strategies and tactics and the ordering and the release of resources. The IC has overall authority and responsibility for conducting incident operations and is responsible for the management of all incident operations at the incident site. [Note: generally trained in active, hands-on emergency response in accordance with the OSHA "HAZWOPER" regulations (29 CFR 1910.120) and FEMA ICS Courses ICS-100 through 400.]

Major Emergency/Incident: Any incident that affects an entire building or buildings or a large number of employees and which will disrupt mission-critical operations (may include emergency repair of affected agency structures, infrastructure and plant facilities). Outside emergency services will probably be required, as well as major efforts from available DEP resources. A major emergency will likely require implementation of the Incident Command System (ICS) by outside responders.

Minor Emergency/Incident: Any incident which will not seriously disrupt mission-critical operations. Such an incident may only affect a portion of one building or one room and not affect the overall mission of the facility. Examples include a local fire extinguished at the incipient stage and instances where the damage and smoke contamination is contained to one room and does not affect the overall function of the facility (see **Attachment 1**).

<u>Mission-Critical Operations:</u> Any operation which if lost or seriously disrupted will prevent DEP from providing services to meet its mission (e.g., providing safe drinking water, removing waste and stormwater, treating wastewater to prevent disease and surface water quality degradation). Bureau management will determine whether the operation is mission-critical based on the extent of damages and their knowledge of whether loss of facility function will disrupt critical services.

<u>Post-Major Emergency Assessment</u>: The assessment of a post-emergency incident condition involving significant damage to DEP buildings, infrastructure, equipment, piping and appurtenances or the potential release of hazardous materials to the work environment, groundwater or surface water, and which will require further assessment and recovery operations.

<u>Post-Minor Emergency Assessment</u>: The assessment of a post-emergency incident condition in which there is little likelihood of contamination of the work environment (e.g., a brush fire not affecting plant buildings) that will require no further assessment and/or recovery activities or where inability to re-enter will not affect mission-critical operations.

Recovery Management Plan: An event-specific written plan developed to identify hazards in work areas; to assess damage to facility and equipment, plant operations status,

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and the potential for personnel exposure to hazardous materials; and to clearly plan for appropriate cleanup or corrective actions to restore the facility to normal operations.

Recovery Management Team (RMT): Persons with special skills, knowledge and abilities who shall develop the Recovery Management Plan and oversee its implementation.

Recovery Team Coordinator: The senior facility or Operating Division representative (Facility Emergency Coordinator or person knowledgeable in facility operations designated by the Deputy Commissioner) who shall be responsible for coordinating the appointment of a Recovery Management Team and overseeing a Recovery Management Plan that will bring the facility or affected area back to normal operating conditions following an incident requiring Post-Major Emergency Assessment.

<u>Unified Command (UC)</u> – the approach to multi-jurisdictional or multi-agency incident management taken in both the City Incident Management System (CIMS) and National Incident Management System (NIMS) for major incidents that require multiple agency response (e.g., loss of Mission Critical Operations or incidents having potential "outside the fence line" impacts). The UC is a team of people representing involved agencies which have responsibility for the incident, and which jointly provide management direction for an incident through a common set of incident objectives and strategies established at the command level. Response agencies are trained in forming a UC.

4 INCIDENT MANAGEMENT

4.1 Incident Identification

In the event of an emergency in which facility or work area evacuation is required (whether caused by hazardous materials, fire, explosion or any other event), the Facility Emergency Coordinator (FEC) is responsible for implementing the EAP DEP facility personnel and on-site contractors must (1) be familiar with the facility's EAP which clearly identifies the FEC's role in an emergency, (2) recognize the FEC's authority during an emergency and (3) understand their obligation to notify the FEC as soon as practical after discovering an emergency. Other Bureaus/Offices having personnel with knowledge, resources and appropriate training may play a role in support of the FEC.

The FEC, to the best of his/her ability, will assess whether the event is an emergency requiring activation of the EAP, evacuation of personnel from affected areas (or the entire plant if necessary) and a request for outside emergency response agency assistance through either 911, the DEP Call Center or the DEP Police Command Center. Outside assistance will be summoned, following the Citywide Incident Management System (CIMS) within New York City or County protocols outside the City. The DEP Call Center or DEP Command Center is responsible for secondary notifications of DEP Bureau Management and, if hazardous materials may be released, DEP Hazmat (BEC or BWS) and Agency or Bureau EHS staff.

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In a major emergency, once all critical life-safety notifications are made, the FEC shall initiate notification up the Bureau Management chain-of-command. The Deputy Commissioner or most senior available Bureau official shall determine whether to mobilize other qualified or experienced staff persons to the site to assist the FEC during the incident and to prepare for post-incident assessment and recovery.

4.2 Transitions of Authority during an Incident

4.2.1 Transfer of the FEC Role within DEP

The FEC role may be transferred at the scene only when a more senior member identified on the FEC line of authority in the EAP arrives at the scene and requests it, or when transfer becomes necessary because of staff rotation. The bureau Deputy Commissioner may designate and/or change the FEC at any time during or after the emergency. Any transfer of the FEC role to another DEP employee shall take place face-to-face. The FEC should perform a thorough debrief and pass on all information pertaining to the emergency/incident to the DEP employee relieving him/her. The new FEC will gather as much information as possible on the cause of the incident and planned response actions including, but not limited to:

- > Emergency situation status;
- > Emergency communications systems;
- Response/recovery objectives and priorities;
- > Current organization;
- Resource assignments (equipment and personnel);
- > Resources ordered and/or planned; and
- ➤ Known or potentially affected areas/facilities.

4.2.2 Transfer of Authority to an Outside Incident Commander

Outside emergency responders (e.g., FDNY, NYPD, and Local and County emergency response personnel) work under an Incident Command System (ICS) that has been adopted by the National Fire Academy for New York State, New York City, and Towns, Villages and municipalities in the State. For example, the local Fire Chief or Chief of Emergency Services is considered the Senior Emergency Response Official responding to an emergency. In New York City, leadership and inter-agency coordination is governed by CIMS, which integrates both ICS and the requirements of the National Incident Management System (NIMS).

In the event an emergency warrants additional response from outside emergency responders, the FEC will formally transfer command to the IC (e.g., the Fire Chief or Chief of Emergency Services) upon his/her arrival at the scene, brief him/her on the most critical aspects of the emergency, recognize his/her authority in an emergency, and remain with the IC to act in a supporting role as requested by the IC. Where there is loss of water/wastewater Mission Critical Operations or incidents have "outside the fence line" or public domain impacts, CIMS and NIMS call for establishing a Unified

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Command (UC) in which responsibilities are shared among multiple parties including an appropriately trained DEP representative.² If a new DEP employee takes over for the FEC, he/she should notify and establish communications with the IC.

4.3 Termination of the Emergency and Transition to Recovery Operations

After the emergency is mitigated at a Facility, the IC (typically, the local Fire Department) will declare the emergency terminated, and will transfer command back to the FEC. If the emergency/incident is of such a minor nature that outside responders are not necessary, the FEC will declare the emergency situation terminated. In instances in which severe damage and contamination prevent normal occupancy and resumption of critical operations, the Bureau emergency notifications will include senior Bureau management including the Deputy Commissioner or his/her designee and senior management and Recovery Management Team representatives (see Section 6) who may already be mobilizing to the site.

When the emergency situation has been terminated, and control has been returned to the FEC, there still may be hazards created by the emergency that were not within the scope of outside responders to address or assess, but which may represent a hazard to personnel attempting to clean up/remediate the area or re-enter the facility to resume normal operations.

At this time, the FEC (with support from Bureau EHS or other qualified staff) shall request information from the IC, first-responders or knowledgeable site personnel concerning the extent of potential damage or conditions that may present a risk of release of hazardous materials to the work environment including releases from storage tanks, drums, transformers, potential asbestos-containing materials, painted surfaces, process equipment, etc. The table below lists the most likely post-incident conditions that are associated with major emergencies.

| Primary Emergency | Air/Surface Contamination | Structural Damage | Infrastructure Damage | Inoperable Life Safety Equipment | Dispensed Safety Equipment |
|----------------------|------------------------------|----------------------|--------------------------|--|----------------------------------|
| Medical | | | | $\sqrt{}$ | $\sqrt{}$ |
| Confined Space | | $\sqrt{}$ | | V | \checkmark |
| Fire or Explosion | √ | V | √ | V | √ |
| Severe Weather | √ | V | √ | V | √ |
| Power Outage | | | √ | | √ |
| Acts of Violence | √ | V | √ | V | √ |
| Chemical Release | √ | | √ | | √ |

² Training shall be in accordance with OSHA's 29 CFR 1910.120(q)(6)(v) and shall include IS-700, ICS-100, and ICS-200.

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The FEC should ensure that he/she notes the following information from the IC prior to the IC's leaving the site:

- Areas where structural components are clearly or possibly compromised;
- > Equipment, piping or insulation clearly or possibly damaged;
- ➤ Areas where high heat may have mobilized hazardous materials from painted/coated surfaces or electrical components;
- ➤ Known or suspected liquid releases of site petroleum and/or hazardous materials:
- Likely path of air contaminant movement (gases, soot, etc. from hazardous materials, fire of high heat);
- > Likely path of fire water flow; and
- Any other potential sources of physical or chemical hazards.

When Recovery Operations begin, the FEC must ensure that entry into the affected area is restricted so that untrained, non-emergency DEP or contractor personnel do not enter until a site assessment by qualified persons can be conducted.

5 POST-EMERGENCY SITE ASSESSMENT

The purpose of the site assessment is to determine whether all of the hazards that could have been generated during or after the emergency have been addressed or mitigated. The FEC will determine if a post-minor or post-major emergency assessment is required based on definitions in **Attachment 1** and Bureau EHS and management input, as appropriate. A **Post-Minor Emergency Assessment** applies to a situation in which there is little likelihood of post-emergency contamination to the workplace or environment. A **Post-Major Emergency Assessment** applies to a situation in which there is significant or potentially significant contamination or damage to DEP buildings, equipment, piping and infrastructure or the potential release of hazardous materials to the work environment, groundwater or surface water. If it is not clear, the FEC should consult with the bureau management chain-of-command to determine if it is a Minor or Major emergency.

Specific procedures for minor and major post-assessment are presented below.

5.1 Post-Minor Emergency Assessment

If the FEC determines that there is no significant damage or release of hazardous materials to the work or general environment, no further assessment and recovery activities are required. Such a minor emergency incident may still require the FEC, Responsible Individual or designee to follow-up on the cause of the incident by:

1. Preparing an Environmental Release Report for any spills or releases (see Attachment A of the Spill Prevention, Environmental Release Reporting, and Investigation or equivalent); and/or

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- 2. Preparing an Accident Investigation Report for injuries and/or exposures related to the incident (See <u>Attachment B of the Injury & Illness Record Keeping Policy</u>); and/or
- 3. Preparing an Incident Investigation Report for other incidents not resulting in a spill, release, or injury at Process Safety Management / Risk Management Program (PSM/RMP) regulated facilities (See the Incident Investigation Element of the PSM/RMP Program).
- 4. Preparation of any other reports as required by the Bureau/Office or DEP.

While Post-Minor Emergency Assessments do not require the formation of a Recovery Management Team or implementation of Sections 6 through 10 of this guidance document, the FEC may still request assistance from senior Bureau Management. Bureau Management may request further assessment and/or assistance from other DEP groups, Divisions, or Bureaus.

5.2 Post-Major Emergency Assessment

If the FEC determines a Post-Major Emergency Assessment is required, then further assessment and recovery operations will be necessary including the following:

- Formation of a Recovery Management Team.
- > Completion of initial assessment.
- ➤ Identification of the need for additional DEP or external resources.
- > Environmental and work place sampling.
- > Data analysis and decision making.
- Recovery Management Plan.
- > Communications to employees on access restrictions.

6 RECOVERY MANAGEMENT

6.1 Team Formation

Once an incident has been categorized as a Major Emergency, further evaluations will be required prior to employees' re-entering and re-occupying the affected area. A Recovery Management Team (RMT) must be formed to guide these evaluations.

The composition of this team shall be based on:

- 1. Knowledge of the facility or DEP infrastructure, and its operations.
- 2. Knowledge and experience in emergency response, Incident Command risk assessments, industrial hygiene, and environmental sampling.
- 3. The authority to plan for and commit bureau resources, non-DEP resources, and to request additional resources from the Department and other city agencies.

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The senior facility representative on site at the time that the emergency response terminates from the owning Bureau is responsible for coordinating the formation of a RMT. The core of this team must include:

- ➤ The senior representative (FEC or person knowledgeable in operations designated by the Deputy Commissioner);
- ➤ A Bureau EHS representative;
- An individual knowledgeable in investigation of areas potentially contaminated with hazardous materials (if applicable); and
- A representative of senior Bureau Management (i.e., the Deputy Commissioner or designee).

Other team members will be incorporated as needed (e.g., contractors, union representatives, human resources, public relations, legal, engineering, and where applicable, local emergency coordinators). Each Bureau should establish a "Call Out" list with contact information for the employees identified under each of the above roles for initial notification. Once the core RMT has been established they will begin to evaluate site conditions to determine the extent of damage.

The RMT will discuss potential issues that may have resulted from the incident and for each issue discussed, a resolution must be developed. The resolution may be as simple as "not a concern at this time" to additional information and resources are needed to identify concern. To promote prompt resolution and ensure appropriate actions are executed, the Deputy Commissioner will identify a team leader who will be responsible for overall coordination, communication and decision making.

6.2 RMT Assessment

When possible, the RMT should quickly convene at a safe distance near the scene to begin to understand the incident, equipment, building, and chemicals involved.

6.2.1 Information Gathering

Information gathered during the incident and facility information will be used to assess whether there is structural damage, equipment damage, and/or contamination of the work environment or general environment that may restrict re-entry. Prior to personnel re-entering the facility, the RMT must gather all available information with respect to:

- ➤ <u>Structural</u> components of the facility that may have been compromised, as determined in an initial assessment by the Fire Department and later by other entities (e.g., DEP Civil Engineers, engineering contractors or Department of Buildings).
- ➤ <u>Electrical</u> hazards caused by direct damage or water entering electrical equipment (e.g., from fire-fighting or breaches in the structure, infrastructure and precipitation).

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- Thermal hazards: risk of burns from hot building components or equipment or risk of heat exhaustion/heat stroke from localized increased air temperatures; thermal hazards should be considered when PPE is selected, as respirator and protective clothing will inhibit the body's natural cooling process.
- ➤ <u>Mechanical</u> hazards (e.g., damaged rotating equipment that may throw projectiles on restart, unstable elevated piping and equipment).
- **Construction** or reconstruction areas.
- > Critical equipment locations.
- ➤ Hazardous material storage and use locations.
- > Type, amount, and duration of <u>potential contaminant releases</u>, and their toxicity and physical/chemical hazards.
- ➤ <u>Building construction materials</u> involved in fire or release.
- **Byproducts of decomposition** (fire or chemical reaction).
- ➤ <u>Ventilation Systems</u>: whether normal systems have been shut down (fire damper fusible links have activated, blocking normal ventilation systems and requiring manual resetting); whether fire fighting has enhanced natural ventilation (e.g., windows broken).
- Abnormal <u>pooled liquids</u>: to be treated as a potential hazard until assessed and found to be non-hazardous.
- Meteorological conditions.
- Air and liquid <u>contaminant transport pathways</u> (routes the contaminants may have moved) and potential extent of the area of contaminant spread based on surfaces and configuration.

Information sources may include:

- > Emergency and related plans (SPCC, SPR, etc.);
- ➤ DEP Legacy Program Facility Specific Assessment Reports (FSARs);
- ➤ LOTO Procedures
- > Sampling data (e.g., project lead, asbestos, PCB or mercury assessments);
- ➤ Blue prints;
- Maps and as-built drawings (Facility/Sewer/Distribution/etc.);
- > Piping and instrumentation diagrams;
- Facility knowledge;
- > Age of facility;
- > Hazardous waste records;
- ➤ MSDSs:
- > Evacuation Plans.

Using the information gathered, the RMT will attempt to determine the extent of the damage and/or contamination (i.e., is the entire facility or area impacted or is the damage confined to specific areas). The damage assessment form in **Attachment 2**

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may be used for this purpose. Consideration should also be given to potential impacts outside of affected buildings and/or off of DEP property.

The RMT should immediately request additional resources if needed to complete a preliminary assessment and restore critical operations. Personnel may be recruited from other workgroups, other divisions, other bureaus, first responders (non-DEP) and/or other City departments as needed (see **Attachment 3** for a list of Bureau Liaisons).

Utilizing the preliminary information gathered, the RMT must decide if there is sufficient information to properly assess the suitability of re-entering and/or re-occupying the facility. In most instances, some degree of additional information will be required. In all cases assumptions based on documents and reports from emergency responders should be verified during a facility inspection.

For most major emergencies one of the most critical determining factors for re-entry will be the presence/absence of ambient air and surface contamination. The intent of the sampling is to collect appropriate samples and compare the results to applicable OSHA, ACGIH and NIOSH standards for worker health and safety. Sampling locations should normally include breathing zones, as well as places of potential accumulation for lighter/heavier than air gasses. Sampling should also include unimpacted background air locations (well away up wind from spill/fire). Sample locations and times should be documented.

PERSONNEL ENTERING POTENTIALLY CONTAMINATED/DAMAGED AREAS SHALL USE APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT (PPE) UNTIL BUREAU EHS REPRESENTATIVES HAVE DETERMINED THAT AN AREA IS SAFE FOR ENTRY WITHOUT THE USE OF PPE.

6.2.2 Identification of Additional Information/Resources

If there is insufficient information available to make an informed assessment as to the suitability of re-occupying a facility/area or the preliminary assessment indicates the facility/area is not suitable for occupancy, the RMT must identify what additional resources are required, including personnel with specialized skills, equipment, and/or contracted goods and services.

DEP Resources that can provide technical guidance and/or on-site assistance include:

> DEP Police

o Provide post-incident access control or security if needed.

Division of Emergency Response and Technical Assistance (DERTA)

 DERTA assessment and monitoring capabilities normally used for assistance in New York City emergencies outside DEP facilities may be applied with the Commissioner's authorization.

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> Bureau of Engineering Design and Construction (BEDC)

- o Identify construction projects and contractors present in construction areas and their status.
- Provide technical and logistical post-incident support directly or through contractors.

> Bureau of Public Affairs and Intergovernmental Affairs

 Liaison with the Public and the press on matters relating to the incident and its effects.

Bureau Environmental Health and Safety (BEHS)

- o Sign manifests and track waste.
- o Coordinate an inspection with PESH after an emergency or incident.
- o Provide the facility with real time air monitoring.
- o Collect solid or liquid samples as needed after an emergency or incident.
- o Dispatch environmental contractors to perform quantitative post incident testing if required.

Contact information for the DEP Police, Bureau of Public Affairs and BEHS is provided in **Attachment 3.**

Non-DEP resources to be considered include:

- > Safety professionals and industrial hygienists.
- > Certified Asbestos Investigators/Inspectors.
- Certified Lead Assessors.
- Air monitoring consultants/technicians (must be certified for asbestos sampling).
- > Toxicologists.
- > Hazardous Materials Technicians ("HazMat").
- > Structural engineers.
- > Electrical Engineers.
- > Electricians.
- > Cleanup contractors.
- Environmental sampling equipment (for air, water, solid surfaces, soil), such as:
 - O Direct reading instruments (e.g., photoionization detectors, four-gas meters, total particulate counters);
 - o Analytical sampling equipment (including laboratory test services).
 - o Wipe samples.
 - o Soil coring or gas vapor sampling equipment.
 - Specialized sampling equipment (e.g., portable gas chromatography/mass spectrometry).
- ➤ Heavy machinery (e.g., cranes, vacuum trucks, bucket trucks, boom trucks).

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Additionally, the need for support staff for site control, public relations, human resources, labor management, and legal counsel should be evaluated. The RMT will not only need to identify what resources are required, but where/how to obtain them.

6.3 Data Analysis and Decision-Making

The RMT must assemble and evaluate all necessary data (including sampling results) to determine a suitable course of action to re-occupy the space, generally making one of the following three decisions:

- 1. The data available are sufficient to support a decision to re-occupy the facility under normal conditions.
- 2. Re-occupation can occur, but with certain restrictions (e.g., access-restricting specific areas), engineering controls (e.g., ventilation), administrative controls, and/or PPE while additional data are gathered or remediation efforts take place.
- 3. Re-occupation cannot occur per the information that is available. Additional workplace sampling and evaluation are needed.

Decision paths two and three referenced above will require the development of a Recovery Management Plan, discussed below. Re-occupation decisions will be based on regulatory thresholds, where they exist (e.g., PCB surface concentrations). Otherwise, DEP will develop re-occupation criteria based on site-specific evaluation during this phase of the post-incident planning or apply guidelines on re-occupation criteria that it may, at its discretion, develop in advance for common facility situations. The RMT is responsible for making the final decision that it is safe to re-occupy a building or space based on the information gathered, evaluations conducted to support decision making and, when applicable, successful completion of the Recovery Management Plan.

The RMT will reassess the data as conditions change and revise re-occupancy decisions accordingly.

7 RECOVERY MANAGEMENT PLAN

When re-occupation is restricted or not allowed, the RMT will develop a Safe Work Practice/Recovery Management Plan ("Plan") specific to the facility conditions and operations, the scope of the damage, and the anticipated duration of recovery. The principle objectives of the Safe Work/Recovery Management Plan are to:

- ➤ Determine what measures are required to operate critical equipment or temporarily replace its function until full re-occupation can occur and to take the necessary samples and process control readings required by law and/or permit;
- > Establish temporary work areas/assignments for displaced staff; and

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➤ Identify additional information/resources/actions required to resume normal operations.

The Plan should address the following:

- ➤ Goals, objectives, anticipated scope and duration of recovery activities based upon initial damage assessment;
- > Strategy for the evaluation and restoration of critical operations (e.g., establish priorities/objectives, what can be restored quickly, what temporary fixes can be quickly implemented before permanent ones);
- ➤ Health and Safety Plan (HASP) covering measures to be taken by staff operating in restricted areas as well as for all follow-up evaluation and restoration actions;
- Completion of any additional safety, environmental, structural or other detailed damage assessments;
- Establishing funding under an emergency declaration;
- Procurement of equipment and supplies;
- ➤ Additional staffing needs;
- ➤ Coordination and supervision of all contractors' and suppliers' activities;
- ➤ Coordination with outside entities (e.g., regulatory agencies);
- Preparation and review of communications with the media, employee unions and/or the general public;
- Re-supply of equipment and supplies consumed in the recovery;
- ➤ Requirements for checking functionality of restored system components and clearing resumption of operations, water consumption, etc.; and
- > Documentation of all expenditures in the form required for cost recovery from insurance or responsible parties.

If time is of the essence to restore critical operations, HAZWOPER trained individuals may assess the required safeguards and enter with support from facility-knowledgeable staff to conduct temporary operations until sufficient assessment and planning is conducted to allow Operations staff to re-enter (i.e., after identifying needed precautions, PPE, training, etc.).

8 RECOVERY ACTIVITIES

The RMT will coordinate critical recovery functions through regular team meetings that monitor progress, reassess priorities, and resolve new issues until the facility is brought back to a "pre-emergency" condition. Key activities may include:

- > Establish restricted area of suspected contamination (if no sampling information is available, be conservative).
- > Communicate location of command post (if applicable) to all DEP employees to facilitate communication.

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- ➤ Install barriers (e.g., red **DO NOT ENTER** tape), shielding and, if appropriate, signs (e.g., **DO NOT ENTER, AUTHORIZED PERSONNEL ONLY, FIRE/CONTAMINATION ASSESSMENT AREA**).
- > Incident scene security and safety:
 - o Preserve evidence;
 - o Hire security staff;
 - Develop authorized personnel/agency lists and standard operating procedures for personnel ingress and egress;
 - o Identify clean and contaminated work zones, decontamination, donning/doffing locations, etc.
- > Protection of employees and the public:
 - o Identify and implement engineering and/or administrative controls and/or PPE requirements when releases of hazardous materials or toxic substances into the air, water, or facility surfaces have been documented.
 - o Coordinate with the IC/UIC on measures to protect the public (e.g., PD to secure perimeter, steps for evacuation, street closures).
- > Interface with other Agencies/Utilities/Bureaus/DEP Bureau of Communications and Intergovernmental Affairs (BCIA), as required.
- > Employee assistance:
 - o Provide medical, psychological, or physical assistance in cases in which employees experienced injury, exposure, trauma, grief or other major loss.
- > Conduct additional detailed assessments:
 - o May include follow-up monitoring, engineering assessments or other specialized comprehensive damage assessments.
- > Perform emergency/temporary repairs:
 - Immediate actions to restore partial area or system function, including marshalling inside staff and executing agreements for immediate supplies, equipment and contractor services.
- Incident Investigation
 - o Determine the "root cause(s)" of the incident as a "lessons learned" objective and to help prevent a similar incident from re-occurring.
 - O Share results of this investigation with all affected personnel. [Refer to the DEP Injury/Illness Investigation and Recordkeeping and/or the DEP Environmental Incident Reporting & Investigation procedures and/or the RMP Incident Investigation, as applicable.]
- > Abate discharges:
 - o Take action to report and abate discharges or releases that occur due to system breaches and may continue or first be recognized during recovery.
- Environmental cleanup and restoration:
 - o Arrange for cleanup and disposal by qualified vendors (e.g., licensed asbestos abatement firms), preferably those already under DEP contract, of any

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hazardous or non-hazardous waste or infectious residues generated during the incident or recovery efforts.

- O Decontaminate critical operating areas for re-occupancy as the highest priority (e.g., control rooms before warehouses, primary treatment before biosolids).
- o Assess broader environmental contamination, if appropriate.
- Cleanup to appropriate and applicable criteria based on regulations and DEP procedures (e.g., for lead, PCB, and asbestos) or other site-specific criteria established by assessment and/or the cleanup contract.

9 COMMUNICATION

When it is safe to re-occupy all or some of the working space, the RMT will inform the FEC, who will then inform supervisors of the impacted area, via the plant communication system. It is the supervisors' responsibility to inform those under his/her supervision that it is safe to return to normal or restricted working conditions.

If there are areas that will remain access-restricted due to remediation, the Responsible Individuals will also implement applicable employee communication requirements of the DEP Hazard Communication/Right-to-Know Program.

The results of any air monitoring data that provide a clearance condition should be posted in a conspicuous place in the facility. Documentation used to support the assessment that it is safe to re-occupy an area should be made available for review.

10 CONTROL OF SHARED / LEASED FACILITIES

Facility control must be clearly defined wherever there is more than one Workgroup, Division, or Bureau in residence. In almost every instance, the Owning Bureau's Operating Division is the "landlord" in control of the facility and its onsite senior facility representative is responsible for forming the RMT with a health and safety representative and a representative of senior Bureau Management from the Owning Bureau. In instances in which "tenant" groups are affected by the incident (e.g., their operations or projects are affected) the RMT should include a representative from the affected tenant groups. There are two exceptions for which facility control is not as described above:

- 1. DEP occupies leased space and must work with the landlord to facilitate recovery efforts.
- 2. The Owning Bureau has turned over control of a facility to another Bureau for construction/rehabilitation purposes.

10.1 Leased Spaces

Leased spaces in which a single Bureau "owns" the operation are handled as above, except that the DEP Contract Supervisor for the lease agreement (or a representative selected by its senior management) must be on the RMT to manage lease/landlord issues and interactions. If DEP is a third party tenant with multiple Division/Bureau employees in residence, it is not likely that there will be mission critical equipment

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that must be operated. Rather, the main concerns will most likely be document/records recovery and finding alternative workspaces until the lessee can return the facility to normal operating conditions. In these instances, DEP's Contract Supervisor for the lease agreement (or a representative selected by senior management of his/her organization) will act as the "owning Bureau" and coordinate the formation of the RMT. Each tenant's manager must work with its Bureau's Senior Management (Deputy Commissioner or designee) to identify a participant in the RMT, although the Bureau may work independently to accommodate its displaced employees and restore its operations/functions in matters that do not require coordination by DEP's leasing organization.

10.2 Temporarily Relinquished Facilities

In certain situations, facilities are mostly or totally turned over to another Bureau for capital improvements and, in many cases, not staffed by employees of the Owning Bureau during the project. In these instances, if the major incident is caused by or impacts the work being performed under the capital improvement project, the DEP senior representative from the Bureau overseeing the contract on-site at the time that the incident terminates will coordinate formation of the RMT. The Recovery Team will consist of this coordinator, an EHS representative from the bureau overseeing the contract, a Senior Management representative from the Bureau overseeing the contract (Deputy Commissioner or designee), and an employee with intimate knowledge of mission critical operations that are directly or indirectly affected by the incident.

In circumstances when the work performed under the capital improvement program did not cause or was not impacted by the incident, the Owning Bureau will assume all responsibilities for RMT coordination and management. In cases in which the incident and/or recovery efforts disrupt capital improvement work (e.g., they affect access and working conditions), the DEP Contract Supervisor should be part of the RMT. Consideration may also be given to having representatives from the construction management consultant and the contractor as part of the Team.

11 Personnel Training

Senior facility representatives who are identified as FECs in non-office locations and Responsible Individuals will receive training on their EAP coordination roles, on relevant portions of this Guidance (at least up to the point of the formation of the RMT) and on any site-specific plan. Bureau EHS and Bureau Management will be further trained on this Guidance or on Bureau-specific plans that integrate this approach. Selected staff may be further trained in ICS, HAZWOPER and recovery planning.

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ATTACHMENT 1 EMERGENCY CLASSIFICATIONS

| | Incident Threshold | | | | |
|--------------------------------|--|--|--|--|--|
| | Minor | Major | | | |
| Fires | Localized, damage and smoke contamination limited to a portion of one building or room, not affecting overall facility mission | Wide spread physical damage or smoke contamination affecting an entire building or critical locations within a building (e.g. control room) that affect the overall facility mission | | | |
| Toxic gas releases | Local release, with only minor onsite injuries, no fatalities | Offsite release, with onsite injuries or fatalities or offsite injuries. | | | |
| Chemical spills | Local release that does not travel offsite | Offsite release that reaches the environment | | | |
| Loss of operations personnel | See Injury/Illness Investigation and Reporting | Incident impacts numerous personnel and impairs the ability to maintain critical operations. | | | |
| Explosions | (See Fire) | (See Fire) | | | |
| Other (flooding, storm damage) | Localized, damage limited to a portion of one building or room, not affecting overall facility mission | Wide spread physical damage affecting broad areas and the overall facility mission | | | |

DAMAGE AND IMPACT ASSESSMENT

ATTACHMENT 2

| Initial Report Follow-Up | | Date & Time Report Completed | | | | |
|---|--------------------------|------------------------------|-----------------|--|--|--|
| Facility: | | Part of Facility Affe | cted: | | | |
| Type of Incident (Fire, Spill, | Process Upset, Area): | _ | | | | |
| Report By: | | _ | | | | |
| Title: | | | | | | |
| Dept. or Agency: | | | | | | |
| ONSI | TE EMERGENCY COORE | DINATION CONTACT | INFORMATION | | | |
| Phone: () | Fax: () | | 24 Hour: () | | | |
| Description of Overall Situat | tion and General Actions | s Taken: | 1 | | | |
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| | | | | | | |
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| IMPACTS ON PEOPLE | | | | | | |
| Affected Individuals | | | | | | |
| Buildings Evacuated: | Number Evac | uated: | Number Missing: | | | |
| Number of Injuries: Number Shelt | | ered: | | | | |
| - | | | | | | |
| Special Populations/Special Facilities Affected (Control Rooms, Office Spaces, Electrical Distribution, Etc.) | | | | | | |
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| | | | | | | |
| NOTIFICATIONS | | | | | | |
| То: | Rcvd By: | | Date/Time: | | | |
| | | | | | | |
| | | | | | | |

DAMAGE AND IMPACT ASSESSMENT

ATTACHMENT 2

IMPACTS ON OPERATIONS

Major Damage

Facilities

| Facilities | | Destroyed | | ed | Major Damage | | Minor Damage | | Fire Chemical | |
|--------------------------------|--------|-----------|----------------------------|----------|--------------|-------|-----------------|----|------------------|--|
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| | | | | | | Curi | rent Status | | | |
| Operations | | | Fully Operation | | tional | 1 | ly Operation | al | Inoperable | |
| - | | | | - | | | | | | |
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| | | | Wha | at | | W | ho | | Initial Response | |
| Known Exposure | | | VVIII | <u> </u> | | | | | initial response | |
| Business Property Dar | nage | | | | l | | | I | | |
| Destroyed | Ма | jor Dan | nage | Min | or Dama | ge | Affected | | Percent Insured | |
| | | | | | | | | | | |
| Est. Duration for Re-occupying | | | Personnel Displacement/Exp | | | pecte | pected Duration | | | |
| (Due to Incident) | | | | | | | | | | |
| Business/Economic Im | pact C | ommen | its: | | | | | | | |
| | | | | | | | | | | |
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DAMAGE AND IMPACT ASSESSMENT

ATTACHMENT 2

| 1) | Did event result in potential atmospheric contamination or other environmental impact (fire, spill, etc.)? |
|----|--|
| | Location(s): |
| | f yes: Monitoring to be performed by Type of Monitoring |
| 2) | Structure Damage |
| | f yes: Assessment to be conducted by: |
| 3) | Light, Heat, Ventilation Inoperative |
| | Location(s): |
| | Assessment to be conducted by: |
| | Location(s): Date/Time: By: |
| | Location(s): Date/Time: By: |
| | Locations not cleared for re-entry: |
| | Location(s): Date/Time: By: |

ATTACHMENT 3

DEP MAJOR INCIDENT RECOVERY RESOURCES

This lists other DEP Bureaus/Offices which may support the *Recovery Management Efforts*, their corresponding areas of expertise. Each Bureau's senior staff on call for emergencies can be reached after hours through by contacting the 24 hour DEP emergency numbers as follows:

Out of City: DEP Police Command Center 1-914-245-6694 or 1-888-h2o-shed (888-426-7433)

In-City: DEP Emergency Call Center (24 Hour) 1-212-689-1520 OR 1620

In-City DEP Hazmat Dispatcher (BEC DERTA) 212-860-9349

| Bureau / Office | Expertise |
|--|--|
| DEP Police | Tactical support, experience in hands-on response to acts involving hazardous materials in the watershed, access control, first aid, and logistical support. |
| Bureau of Engineering Design & Construction | Information on hazardous materials, construction projects and contractors present in construction areas, technical and logistical support directly or through contractors. |
| Bureau of Environmental Compliance (Primary Role: Division of Emergency Response & Technical Assistance, Hazardous Materials Response Section) | Extensive experience in ICS/City-wide emergency response actions; authority on hazardous materials and asbestos incident response and assessment; capable of providing analysis, evaluation and recommendations to support the assessment and remediation of the affected area as defined in CIMS. Lead city-wide enforcement authorities in air emissions/permitting and asbestos clean-up and remediation/handling. |
| Air and Asbestos Control Programs | |
| Bureau of Public Affairs and Intergovernmental Affairs | Liaison with the Public and the press on matters relating to the incident and its effects. |
| Office of Environmental, Health & Safety Compliance | Specialized knowledge in federal, state, and local environmental, health & safety regulations. |
| Human Resources Administration (HRA) | Specializing in communication with employees and union representation. |
| HRA – Facilities Management and Construction | Leased space management and construction/ repair. |
| HRA – Asbestos Task Force (ATF) | Assessment of potential asbestos containing materials (PACM)/damaged PACM and managing contract abatement. |
| Legal Affairs | Wide-ranging legal support from contract/lease issues to liability to regulatory requirements. |

ATTACHMENT 3

| Bureau / Office | Expertise |
|--|--|
| Water Supply | Mutual aid - manpower, equipment and technical resources. |
| Water Supply- Hazmat Response Team/Confined Space rescue Team | NRP ESF#10 Type-1 ³ Hazmat Response Team, trained in Advanced ICS-NIMS, and WMD Response. Specializing in identification of unknown liquids or solids, WMD, and ambient air monitoring. Experienced in HazMat emergency isolation and mitigation, WMD response, RCRA & DOT waste management, and emergency and non-emergency environmental remediation. NYS Certified Rescue Team in High and Low Angle Rope Rescue and Confined Space Rescue operations. |
| Water & Sewer Operations | Mutual aid - manpower, equipment and technical resources. |
| Wastewater Treatment | Mutual aid - manpower, equipment and technical resources. |

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 $^{^{\}rm 3}$ As defined in http://www.fema.gov/pdf/emergency/nims/fire_haz_mat.pdf