

Procedures for Managing the Incident Investigation after Serious and Catastrophic Incidents

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Advance Planning and Coordination

When a catastrophic event occurs the incident investigation must be coordinated with emergency response activities. This requires a well-written and rehearsed emergency and disaster plan, sometimes known as a crisis management plan. It also requires a documented incident investigation procedure that is well understood by all parties involved.

The Emergency and Disaster Plan

The Emergency and Disaster Plan should be multi-layered to provide immediate response from onsite personnel and include provisions to expand response activities with off-duty and outside personnel on short notice. The plan should make the best use of all available resources including public and private sectors. It must be a functional plan that recognizes the need to protect the:

- Health and welfare of people (employees and the public)
- Environment
- Property and equipment
- Continuity of operations (customers and stockholders)
- Company's reputation

The plan must address all types of emergencies that could reasonably be encountered and meet the requirements of appropriate regulatory agencies such as:

- Occupational Safety and Health Administration
- Mine Safety and Health Administration
- Environmental Protection Agency
- Department of Transportation
- Office of Homeland Security
- State and local agencies

It should include an Incident Command Structure that can work well with on- and off-site personnel including the local Emergency Response Planning Commission.

A comprehensive plan anticipates and prepares for:

- Coordination of response activities via the Incident Command System (ICS)
- Onsite response, shelter-in-place and evacuation
- Off-site notification and response
- Response to community needs
- Dealing with the press
- **Incident investigation**
- Post-incident clean up and restoration of operations
- **On- and off-site claims handling including litigation**
- **Post-incident regulatory inquiries and investigations**

The plan should anticipate response by:

- Police, fire and ambulance personnel
- **Local, state and federal agencies**
- Media representatives
- Community leaders
- Employees and family members
- **Plaintiff attorneys**
- Host employers

The Incident Investigation Procedure

The Incident Investigation Procedure should anticipate investigations by one (1) or more of the following groups:

- Occupational Safety and Health Administration (OSHA)
- Mine Safety and Health Administration (MSHA)
- Environmental Protection Agency (EPA) and Department of Environmental Quality (DEQ)
- United States Coast Guard (USCG)
- Federal Railroad Administration (FRA)
- National Transportation Safety Board (NTSB)
- Department of Transportation (DOT)
- State Police / Law Enforcement / Local District Attorney
- Chemical Safety Board
- Insurance companies
- Plaintiff Attorneys

The procedure should establish the protocol and logistics for handling investigations with respect to:

- Assignment of an Investigation Team and Team Leader
- Assignment of a trained investigator to work within the Incident Command System (ICS) to begin gathering data for the formal investigation

- Retention of counsel
- Release of information
- Site control and restricted access
- Photography
- Collection and preservation of evidence
- Chain of custody
- Spoliation of evidence
- Duplication of documents
- Access to proprietary information
- Employee interviews
- Employee access to counsel
- Settlement agreements
- Claims handling and management

Other areas to consider:

- Administrative support for investigators
 - Clerical personnel
 - Office space, library and copy machine
- Transportation for people, equipment and evidence
- Housing

Who Conducts the Investigation and Why

When a catastrophic event occurs one can expect numerous groups to conduct investigations, and each will have a different reason for doing so. It is very important to understand this concept. Let's look at some of the groups that might be involved.

Company Safety, Health and Environmental Personnel

These individuals have several reasons for becoming involved including:

- Determining the cause(s) to prevent similar events
- Satisfying OSHA and EPA requirements for Process Safety Management (PSM) / Risk Management Program (RMP) events
- Satisfying insurance company requirements
- Satisfying other regulatory agency requirements
- In anticipation of litigation

Occupational Safety and Health Administration (OSHA)

OSHA conducts inspections of workplaces to determine compliance with the OSH Act and with specific OSHA standards. When violations of the OSH Act or OSHA standards are found, OSHA is authorized to issue citations to employers, propose penalties and require abatement of hazards. OSHA investigates serious accidents involving fatalities, events resulting in the

hospitalization of three (3) or more employees as well as major fires, explosions or chemical releases to determine whether any violations of its regulations have occurred and, if so, to require correction of those violations and ensure compliance with the OSH Act.

Chemical Safety and Hazard Investigation Board (CSB)¹

The CSB is an independent investigative agency authorized under section 112(r)(6) of the Clean Air Act to investigate chemical incidents to determine the conditions and circumstances which have led up to an incident and to identify the cause or causes so that similar incidents might be prevented. Its mission is to enhance the safety of workers and the public by uncovering the underlying causes of accidental chemical releases at fixed facilities and motivating remedial action by both the private and public sectors. The CSB is modeled on the structure, activities and authorities of the National Transportation Safety Board that investigates transportation-related incidents. The chemical incidents the CSB investigates are those that result from the production, processing, handling or storage of chemical substances (not limited to extremely hazardous substances) causing death, serious injury, substantial property damage (including damage to natural resources) or evacuations of the public. These incidents may occur at fixed facilities or during transit.

Consistent with each agency's statutory responsibilities, OSHA and CSB may coordinate their fact-finding efforts. The CSB on-site representatives may discuss factual data pertaining to an incident with other on-site agencies.

However, the CSB is an independent agency tasked with certain oversight responsibilities; it is not an enforcement agency. To ensure that during the conduct of an investigation the CSB is not to be perceived as an extension of a state or federal enforcement investigation, its investigative activities will usually be separate and distinct from those of other on-site agencies. Interviews of witnesses and requests for documents will be conducted or requested separately by the CSB unless the company or person(s) involved request otherwise. While the CSB will cooperate with other on-site entities, its focus is different and its interaction with all parties must and will be distinct from the activities of enforcement agencies.

National Transportation Safety Board (NTSB)

The National Transportation Safety Board (NTSB) is an independent agency and the lead Federal investigative agency for all transportation incidents involving hazardous materials including: aviation, railroad, marine, highway and pipeline. This includes (a) incidents that occur during the loading or unloading of hazardous materials into or from containers that are intended to be offered for transport, or that have been delivered for off loading, and (b) incidents that occur during the temporary storage of hazardous materials in transportation containers, prior to or after transport. The NTSB may decline to investigate a transportation-related incident.

In the event of a transportation-related chemical incident under the jurisdiction of the NTSB, the CSB will defer to the NTSB and will not conduct a separate or joint investigation. In the event that the NTSB requests technical investigative assistance from the CSB, such matters will

¹ Internet URL: http://www.csb.gov/index.cfm?folder=Mission_History&page=index

be handled as put forth more fully in the Appendix of the Memorandum of Understanding between these two (2) agencies.

The Mine Safety and Health Administration (MSHA)

The Mine Safety and Health Administration is concerned with possible violations of Mines Safety and Health Administration regulations that may result in civil penalties for the company as well as employees. MSHA regulates surface and underground mines and rock quarries, gravel pits and companies who are the first to handle or process certain mined products.

Insurance Company Representatives

Insurance company representatives are concerned about policy coverage and limitations, payment of claims and possible subrogation.

District Attorneys, State Police, Local Law Enforcement Agencies and Coroner

These groups are concerned with possible criminal violations of local statutes (manslaughter, reckless handling of hazardous materials, etc.).

Personal Injury Lawyers and Experts

Personal Injury Lawyers and their experts will focus on damages for their clients. These damages may be for negligence, strict liability and / or punitive, punishing-type damages. The punitive type damage awards are often much larger than awards for strict liability.

Company Defense Attorneys

Company defense attorneys are involved in protecting the company from civil suits, managers from potential criminal charges and civil suits and, in some cases, employees from civil suits. Different law firms are often used to deal with OSHA, EPA, criminal prosecution and civil suits. **Prior arrangements should be made with OSHA and EPA attorneys who are familiar with your operation and the applicable regulations. OSHA and EPA attorneys familiar with settlement agreements can also be helpful.**

Other Agencies

- The Federal Environmental Protection Agency (EPA) and companion state agencies investigate incidents involving air, ground and water quality issues and violations of the associated permit requirements. The investigations can be:
 - Civil
 - Criminal
- The U. S. Coast Guard investigates incidents that occur on navigable waterways.

- The Minerals Management Service (MMS), a bureau in the U. S. Department of the Interior, is the federal agency that manages the nation's natural gas, oil and other mineral resources on the Outer Continental Shelf (OCS).
- The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) provides resources to local communities in the investigation of explosion incidents and arson cases. ATF's efforts involve the combined use of resources for explosives and arson incidents, such as special agents, auditors, inspectors and forensic and technical specialists that no other federal agency can provide.

Managing the Investigation Process

Appointment of an Investigation Team and Team Leader

As soon as practical, the senior executive of the company should appoint an Incident Investigation Team and Team Leader. These should be individuals trained in incident investigation techniques and have knowledge of the company incident investigation policies and procedures. The appointment of the team should be announced to company personnel to assure complete cooperation. The Team Leader should quickly contact legal counsel to determine if the investigation will be done under Attorney Client Privilege. At the same time one (1) or more incident investigation team members should be dispatched to the scene to start the investigation process.

The members of the Team for a major investigation involving a serious injury, fatality, extensive property damage or serious near miss might include:

- Corporate attorney (provides guidance and controls final report)
- Employee(s) knowledgeable of the area / process / task²
- Supervisor(s)
- Safety personnel
- Technical specialists (including outside experts)
- Middle / Upper Management
- Corporate officers or staff
- Union representatives (if employees involved are represented by collective bargaining agents)

Team Leader Qualifications: The Team Leader should have:

- Good oral and written communication skills
- Organizational skills
- Good people skills
- Knowledge of the investigation process

² When conducting an investigation it is important to get input from the employees directly involved in the incident. However, having these employees present during the investigation process may hamper the free flow of information. Team members may be reluctant to ask the hard questions for fear of hurting their co-workers' feelings. For this reason, it is recommended that the involved employees be interviewed and available for follow-up discussions but they should not be involved in the actual deliberation of the event.

- Credibility

The **Incident Investigation Team Leader** is typically responsible for coordinating the entire incident investigation process including:

- Assisting the Senior Executive in selecting incident investigation team members appropriate for the type of incident
- Making job assignments to team members relative to collecting evidence and taking statements
- Coordinating activities of insurance company claims and safety personnel
- Working with company attorneys to address potential litigation and / or regulatory issues
- Identifying the need for and selection of outside experts to assist in the investigation
- Briefing company executives on the status of the investigation
- Acting as liaison with regulatory agency personnel, attorneys and other groups involved in the investigation
- Coordinating the interviews of employees
- Collecting and managing information gathered during the investigation process
- Drafting the incident investigation report

Note: Depending on the magnitude of the event and the size of the company many of these duties may be delegated to others.

Incident Investigation Team Members reporting to the Incident Investigation Team Leader typically have responsibility for representing the company at the accident scene to:

- Interface with responding personnel and agencies documenting their involvement
- Verify the site is safe for entry
- Identify, collect and preserve evidence if allowed to do so by agency personnel coordinating the emergency response. In doing so, maintain the chain of custody
- Coordinate activities of company personnel and insurance company representatives investigating the incident on behalf of the company
- Identify and obtain statements from witnesses and personnel involved in or affected by the incident to the extent possible
- Maintain a list of evidence requested by and / or given to regulatory agency representatives, claims adjusters or other custodians
- Regularly update the Incident Investigation Team Leader on site activities.

The **Documents Coordinator** has responsibility for handling and processing requests for any and all documents associated with the incident. Documents should only be released with approval from the company attorney. A form should be used to document requests for and dissemination of all documents associated with the incident.

The **Evidence Custodian** has responsibility for storage and security of any evidence collected in accordance with established procedures.

Define the Scope and Your Firm's Level of Involvement

Who Is In Charge?

Before an investigation can begin one must find out exactly where the incident occurred and who is in charge. Depending on the location and nature of the incident your personnel may have limited or no access to the actual scene. For example if one (1) of your employees is injured in a traffic accident, on a construction site or at a client's facility, you will have to work through the host employer or the Authority Having Jurisdiction (AHJ). In certain rare instances, the accident scene may be treated as a crime scene in which case law enforcement personnel will isolate the scene and carefully control access. In such cases you will have to adjust your firm's approach to the investigation.

When responding to the scene the investigation team may have multiple areas on which to focus. First and foremost are the identification, preservation and collection of evidence and taking of statements. The second area of focus is coordinating the interface with arriving agency representatives who also want to identify, preserve and possibly collect evidence and interview company personnel.

If the emergency response is prolonged, a visit to the actual incident scene may be delayed but the investigation can begin. In such instances incident investigation personnel will have to work through the incident command system.

Logistical (Legal) Issues: In a major accident with multiple agencies responding it will be necessary to work out logistical issues such as but not limited to:

- Site access
- Identification, collection and preservation of evidence
- Access to and copying records
- Interviewing personnel and taking statements
- Photography
- Physical inspection and testing of evidence
- Employee access to counsel
- Executive access to counsel
- Identification of in-house subject matter experts (SME's)

Each of these issues should be worked out in concert with legal counsel. It is important to note most of these issues can and should be addressed before an incident occurs and documented in the Incident Investigation and Crisis Management Procedures.

Conducting the Investigation

Secure the Scene and Safe the Area: The Incident Investigation Team Leader or his delegate should visit the scene as soon as possible to assure site access is controlled and the scene is safe for entry. **Note:** This may involve working with or through the On-Scene Incident Commander or Host Employer if the accident scene is on the property of others. No entry should be made into accident scene until it is safe to do so.

Assess the Scene and Communicate: Determine the nature and magnitude of the event and notify senior executives and the corporate attorney

Identify, Collect and Preserve Evidence: To the extent possible identify, collect and preserve any evidence. Evidence may include:

- physical evidence
- paper evidence
- electronic evidence
- photos
- videos
- sketches
- diagrams
- statements

Note: If the scene is controlled by others document who responded to the scene and their level of involvement. Before physical evidence is removed from the scene, document the location, position and condition using a sketch, diagram, map and or photo(s). Physical evidence should be tagged or marked in accordance with company procedures and secured in a safe, access-controlled location to correctly maintain Chain of Custody. **No attempt should be made to disassemble, test or otherwise alter the condition of evidence without the consent of all parties involved and a mutually agreed-upon protocol.** In some cases, physical evidence may have to be protected from the elements and left in place until a decision can be made as to how to proceed. The area may have to be secured and / or guarded. If evidence is collected by others, try to determine what evidence was taken, by whom and where it will be stored.

Sketches and Diagrams should be used to document evidence at the scene that may include the position of people, tools, materials, equipment and any debris. In some cases a debris field map may be needed.

Sketches and diagrams should be labeled with key reference points from which directions, distances or angles can be documented. Measurements should note the location of critical items (tools, materials, equipment and debris) in relationship to reference points. An arrow indicating “North” should be included. Measurements should be as accurate as possible. If the drawing is to scale, the scale should be noted.

Some incidents result in a field of scattered parts or debris. Such is the case in explosions, motor vehicle accidents or incidents involving rotating or moving equipment. Mapping the debris field may help the investigator piece together what happened. It can help establish the location of people, materials and equipment and the direction of travel or movement. It can also illustrate where each came to rest.

Again, accurate measurements are critical. The sketch should be labeled with important information such as directions, distances and angles. If the incident occurred outdoors, note the location of permanent features such as highway markers, fire hydrants, hills or streams. Pieces of debris should be numbered or lettered with their locations noted on the sketch. A legend can be used to list or explain items noted on the sketch.

Photography in incident investigation allows one to re-visit the scene later. The investigator only gets one (1) chance to take photos, so it is best to overshoot and under-print. In other words, take all the photos you need, but print only those that are pertinent to the investigation.

What types of photos should the investigator take? That's a good question and it depends on the nature of the event.

- Thirty-five (35) mm prints are recommended, but the use of digital photos is becoming more common. It should be noted some courts do not allow digital photos. Also remember digital photos often mysteriously end up on the Internet out of your control. Sensitive photos could be embarrassing to the company or stressful to relatives of injured personnel. Each company should develop a protocol for taking photos at accident scenes.
- In a large explosion **aerial photographs may be helpful** to show the entire scene. Aerial photos used in conjunction with triangulation have been used to pinpoint the initial point of failure.
- **Video tapes** of emergency response activities may help the investigators determine how HAZMAT or Fire personnel may have altered the original scene to affect rescue, put out the fire or control a hazardous material spill. Videos of by-standers can also be helpful. In arson cases, the arsonist often returns to the scene to see the results of their handiwork. When using a video camera you may want to leave the audio off for later narration. Sometimes the unwanted background noise of sirens, voices and motor vehicles can limit the value of the tape and raise additional, but non pertinent, questions. Also note that someone may ask if your personnel have altered or edited the tape. Be prepared to answer this question.
- **Photos of injured or deceased workers** are often necessary to show how the body was positioned after the incident, but graphic photos of actual injuries can and should be taken by the medical examiner. Keep in mind the deceased individual's family may see the pictures. There is no need to show graphic photos of the body as it will no doubt be upsetting to family members.
- **Color photos** of flames may help investigators determine what material(s) were burning and temperature extremes.
- **Industrial radiography photos** can be used to show fractures in metals or other objects. They can also be used to determine the position of valves and switches before disassembly.

Identify and Interview Witnesses and Involved Personnel: Identify and, to the extent possible, interview any and all personnel associated with the incident. This may include injured personnel, witnesses, First Responders and other emergency response personnel, those who were in the area just prior to the event as well as those who arrived shortly after the incident. It may be helpful to interview support personnel including engineers, maintenance personnel and other personnel who operate similar equipment or perform similar tasks. **Note:** In many cases it may not be possible to interview the individuals. If the individuals gave statements to others, try to determine and document who gave the statement and to whom and where a copy may be

obtained. It should also be noted, Emergency Response personnel may have altered or moved evidence and the scene in order to safe the area, render first aid or rescue personnel.

Identify other Needed Evidence: Identify and list other evidence that may be needed, who owns or controls the evidence and how it may be obtained. If possible, collect and preserve such information.

Chain of Custody: The chain of custody begins when an item of evidence is collected and continues until disposal. The chain of custody assures continuous accountability. Failure to maintain the correct chain of custody may make it impossible to use the evidence in a legal proceeding.

The chain of custody is a chronological written record of those individuals who have had custody of the evidence from its initial acquisition until its final disposition. Each person in the chain of custody must be identified on a specified form, which is initiated when the evidence is acquired. Each individual in the chain of custody is responsible for an item of evidence to include its care, safekeeping and preservation while it is under his or her control.

A standardized form should be used to record all custody transactions from initial collection through final disposition. A properly maintained chain of custody will ensure continuous accountability.

Photographs should be taken showing the location of the evidence before it is handled or removed. A tag must be attached to each piece of evidence by the investigation team member for identification and control purposes. When a number of items are collected as a single unit of evidence, such as a toolbox filled with tools, a single tag will suffice. A detailed listing of evidence items must be entered on the custody document or log.

The evidence custodian should maintain an evidence log. It must be an accurate accounting of all evidence entered into the system. Evidence should be entered into the log chronologically. The following information should be provided in the appropriate column:

1. Log Number
2. Date and time received by the evidence custodian
3. Investigation team member submitting the evidence
4. Subject title
5. Evidence description (identifiable but brief)
6. Stowage location
7. Temporary transactions
8. Permanent disposition

The Evidence Custodian should maintain an active and a final disposition file. The active file should contain the first copy of each custody document that represents items of evidence pending an active investigation or legal proceeding. The final disposition file should contain the original and first copy of custody documents that represent items that no longer have evidentiary value and for which disposition authorizations have been received.

Coordination of Site Visits and Inspections

Coordination of Site Visits by Others: Post-incident, regulatory representatives, claims adjusters and attorneys may request (or obtain a court order) to make an inspection of the accident scene. Such visits should be coordinated by and through the Incident Investigation Team Leader and legal counsel. Under no circumstances should these individuals go un-escorted. If the visitors take photographs, your company representative should do the same noting any apparent areas of concern.

In many cases agency representatives will want subject matter experts (SME's) to accompany them on site or during area inspections. Your SME's should be identified and briefed in advance by counsel as to what to do and how to respond to questions. Your personnel should be courteous and truthful but not volunteer any information. If they do not know the answer to a question they should say so and note the question for follow-up by a qualified person. Your personnel should be instructed not to speculate or respond to hypothetical questions. Let the facts speak for themselves. If a person being escorted becomes belligerent, immediately notify the Incident Investigation Team Leader and / or counsel.

Coordination of Interviews by Others: Post incident, regulatory representatives claims adjusters and attorneys may request to interview or take depositions from company personnel. To the extent possible all interviews and depositions should be coordinated by and through the Incident Investigation Team Leader and legal counsel. Depending on the nature of the interview legal counsel and / or an employer representative should be present if allowed by law. If the employee being interviewed is represented by a union, a union representative may be allowed. Any questions on this matter should be discussed and cleared with legal counsel if one is involved. This should be done before the interview is granted.

Employees who are asked to give a formal statement to a regulatory agency representative, a claims adjuster or an attorney are often apprehensive, as they do not know what to expect. In advance of their statement or deposition a company representative or attorney should meet with the individual to explain the process and the employees' rights. Employees should be encouraged to listen carefully to each question and give a truthful answer. If they do not know or are unsure of the answer to a question, it is permissible to indicate they do not know or remember. They should not speculate. Employees should be encouraged to cooperate and be polite but not to volunteer information. Stick to the questions asked. Under no circumstances should employees be threatened or intimidated concerning their participation in the investigation.

Requests for Documents: All requests for documents related to the event must be made to the Incident Investigation Team Leader or designated alternate. Such requests must be documented noting the following:

- What document(s) were requested
- Who requested the document(s)
- Date of the request
- Status of the request

It is best to record such information on a documents control log. The Incident Investigation Team Leader must approve the release of any and all documents. **Note:** In certain cases, legal approval will be required before documents may be released.

Team Meetings: During the course of investigation the Team Leader should schedule daily meetings with the incident investigation team to discuss findings and plan future activities. The purpose of the meetings should be to share information and better coordinate the investigation. Team members should not discuss the course of the investigation with anyone outside the investigation team without authorization of the Incident Investigation Team Leader and / or legal counsel if the investigation is being done under attorney client privilege.

Management Briefings and Release of Information: The Incident Investigation Team Leader in concert with legal counsel should provide updates to management on a regular basis. In some cases, it may be appropriate for the Senior Manager to issue a statement or release to all involved or affected personnel. Any such statements or release should be authorized and approved by the Senior Manager and legal counsel if required.

Data Analysis and Report Writing: The Incident Investigation Team Leader should draft the incident investigation report(s) with supporting documents and submit it to senior management and legal counsel for review. If the investigation is being done under attorney client privilege all reports must be submitted to the attorney for review and disposition. All reports should be labeled as “draft” until the final report is approved and issued. Once the final report is approved and issued, ask legal counsel what should be done with any draft reports and supporting documents. Follow their instructions. If the investigation is being done under attorney client privilege, each document should contain a stamp or footer indicating, “**Prepared at the Direction of Counsel – Attorney Client Privilege.**”

Coordination of Reports and Investigations: As previously noted, multiple agencies may have ongoing investigations stemming from a single event. It is critical that attorneys handling each investigation and any subsequent lawsuits communicate with each other before releasing information, issuing a report or settling a case. It is entirely possible that information released to one agency could adversely impact other active investigations and or lawsuits. The Incident Investigation Team Leader and or in-house counsel should meet regularly with each attorney to assure adequate coordination of the investigation(s).

Request for Office Space: In some rare instances where the investigation will be ongoing for several weeks or months, regulatory agency personnel may ask for office space to be provided. Such requests should be forwarded to the Incident Investigation Team Leader who should discuss the request with senior management and legal counsel. To the extent possible any office space provided should be near the company facility but off company property. The intent is to limit uncontrolled access to employees and company facilities to the extent possible.

Developing a Path Forward

- Perform a hazard and risk analysis to identify the potential for serious or catastrophic events. See what safeguards are in place and if they are adequate. If not, develop and implement the appropriate safeguards. A Crisis Management Plan may be needed to handle major emergencies. Of course, the content and level of detail will vary based on the nature and size of your organization.

- Verify that Emergency Action/Response Plans are:
 - in place and involve trained investigator(s)
 - adequate (from a business and regulatory point of view)
 - well understood
- Draft an Incident Investigation Procedure that supports your Crisis Management Plan.
- Verify that personnel who will investigate incidents have the necessary tools, equipment and training.
- Make prior arrangements with attorneys / law firms who specialize in the areas that may impact your organization, i.e., OSHA, MSHA, DOT, EPA, USCG, etc. Have their contact information readily available.
- Keep internal and external emergency contact names and phone numbers up-to-date and readily available.
- Make prior arrangements with consulting / technical firms to provide such services as:
 - Industrial hygiene, environmental monitoring and toxicologists
 - Photography, including thermography and aerial photography
 - Forensic engineers and metallurgists
 - Safety, Health and Environmental Specialists
 - Translator(s) if English is a second language for those who could be involved
 - Trauma / Grief Counselors
 - Evidence gathering firms

Review and update your Emergency and Disaster / Crisis Management Plan at least annually. Provide refresher training on a scheduled basis and test the system with a drill or dry run. It is far better to develop and rehearse procedures that you hope you never need than to develop a plan during the middle of a crisis. The learning curve during a crisis is steep and usually very expensive.

Additional Suggested Resources

1. Ferry, Ted. S. *Modern Accident Investigation and Analysis* (latest edition)
2. National Fire Protection Association (NFPA) 921. *Guide for Fire and Explosion Investigations* (latest edition)