

CRITICAL OBSERVATION & EMERGENCY ESCALATION PROTOCOL

What Happens When Immediate Harm Is Observed

PURPOSE OF THIS PROTOCOL

This protocol exists for **rare situations** where an inspector observes conditions that may pose:

- immediate environmental harm
- immediate public safety risk

It ensures inspectors:

- act responsibly
- do not exceed authority
- protect themselves legally
- protect the city and the program

This protocol does **not** create enforcement authority.

1 WHAT QUALIFIES AS A “CRITICAL OBSERVATION”

A **critical observation** is limited to conditions that are **actively occurring or imminently dangerous**, such as:

Environmental Examples

- visible liquid actively flowing from waste area toward a storm drain
- large volumes of leachate discharging off-site
- hazardous materials (oil, chemicals) visibly leaking
- washdown activity directing pollutants to the storm system

Public Safety Examples

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- structural collapse risk (falling gates, unstable enclosures)
- sharp exposed metal creating immediate injury risk
- fire hazard involving waste or containers

⚠ Important:

Poor housekeeping, open lids, odors, or standing trash **do NOT** qualify unless active discharge or immediate danger is present.

2 WHAT INSPECTORS MUST DO (IN ORDER)

STEP 1 — PRIORITIZE PERSONAL SAFETY

- Do not intervene physically
 - Do not attempt cleanup
 - Do not confront individuals
 - Move to a safe distance
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STEP 2 — DOCUMENT, DO NOT DIAGNOSE

- Take clear photos or video **from a safe location**
 - Document only what is observable
 - Use neutral language:
 - “Active liquid observed flowing toward drain”
 - “Strong petroleum odor present”
 - Do **not** speculate on cause or responsibility
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STEP 3 — STOP THE INSPECTION

- Do not continue routine inspection steps
 - Do not attempt measurements if unsafe
 - Clearly note inspection was halted due to safety
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STEP 4 — NOTIFY PROGRAM CONTACT (NOT ENFORCEMENT)

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- Contact designated program or city point-of-contact
- Provide:
 - location
 - time
 - brief factual description
 - photos if available

Inspectors **do not**:

- contact regulatory enforcement directly
- contact property owners to demand action
- issue warnings or instructions

3 WHAT HAPPENS NEXT (OUTSIDE THE INSPECTOR ROLE)

Once notified, **the authority having jurisdiction** decides:

- whether emergency response is needed
- whether site access is restricted
- whether regulatory agencies are notified

The inspector's role **ends at notification**.

4 WHAT THIS PROTOCOL IS NOT

This protocol:

- is not enforcement
- is not a violation determination
- is not an emergency response team
- does not authorize inspectors to direct corrective action

It exists solely to ensure **responsible escalation**.

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5 DOCUMENTATION LANGUAGE (APPROVED)

Inspectors should use phrases like:

- “Inspection halted due to observed safety concern.”
- “Active discharge observed at time of inspection.”
- “Conditions documented and reported per protocol.”

Inspectors must **never** write:

- “Illegal”
 - “Violation”
 - “Non-compliant”
 - “Must correct immediately”
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6 WHY THIS PROTOCOL MATTERS

Without this protocol:

- inspectors may overstep
- cities may face unmanaged risk
- programs may appear negligent

With this protocol:

- responsibility is clear
- authority boundaries remain intact
- safety comes first
- enforcement remains separate

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