

# **Hazardous Waste Operations and Emergency Response (HAZWOPER)**

***29 CFR 1910.120***

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# Objectives

- HAZWOPER standard overview
- HAZWOPER training
- Resources
- Questions and Answers

# An Outline of the Provisions of 1910.120

- Scope, application, and definitions
- Safety and health program
- Site characterization and analysis
- Site control
- **Training**
- Medical surveillance
- Engineering controls, work practices and personal protective equipment (PPE)
- Monitoring
- Informational programs
- Handling drums and containers
- Decontamination

# An Outline of the Provisions of 1910.120 Continues

- Emergency response by employees
- Illumination
- Sanitation at temporary workplaces
- New technology programs
- Operations under RCRA
- Hazardous substance release

# Scope

- Clean-up operations required by a governmental body, whether federal, state, local or other, involving hazardous substances that are conducted at uncontrolled hazardous waste sites.
- Corrective actions involving clean-up operations at sites covered by Resource Conservation and Recovery Act (RCRA).
- Operations involving hazardous waste conducted at treatment, storage, and disposal (TSD) facilities regulated under RCRA.

# Scope

- Operations that generate hazardous waste but are not TSD facilities.
  - Emergency response operations involving release of, or substantial threats of release of hazardous substances, without regard to the location of the hazards.
- \* Unless the employer can demonstrate that the operation does not involve employee exposure or the reasonable possibility for employee exposure to safety or health hazards.

# Safety and Health Program

Employers shall develop and implement a written safety and health program for their employees involved in hazardous waste operations.

- Organizational structure
- Comprehensive work plan
- Site-specific safety and health plan
- **Safety and health training program**
- Medical surveillance program
- Employer's standard operating procedures for safety and health
- Any necessary interface between general program and site-specific program



# Safety and Health Program

- Comprehensive workplan shall:
  - Define anticipated clean-up activities.
  - Define work tasks and objectives.
  - Shall establish personnel requirements.
  - **Shall provide for the implementation of training.**
  - Provide for implementation of informational programs.
  - Implementation of medical surveillance program.

# Safety and Health Program

- Site-specific safety and health plan
  - Elements
    - Hazard analysis for each site task.
    - **Employee training assignments.**
    - Personal protective equipment.
      - Used by employees for each site task.
    - Medical surveillance requirements.
    - Frequency and types of air monitoring.
      - Personnel
      - Environmental sampling

# Site Characterization/Analysis

- Hazardous waste sites shall be evaluated to identify specific site hazards and to determine the appropriate safety and health control procedures needed to protect employees.
  - **Preliminary evaluation**
    - Performed prior to site entry.
  - **Hazard identification**
    - Conditions that may pose inhalation or skin absorption hazard that are immediately dangerous to life or health (IDLH) shall be identified.

# Training Program Elements

- Employees shall not be permitted to participate in or supervise field activities until they have been trained to a level required by their job function and responsibility.
- Names of personnel and alternates responsible for site safety and health.
- Safety, health and other hazards on site.
- Safe use of engineering controls and equipment on site.
- Work practices by which the employee can minimize risks from hazards.
- Use of PPE.
- Medical surveillance requirements.
- Contents of site safety and health plan.

# Initial Training

- **General site workers**
  - Equipment operators
  - General laborers
  - Supervisory personnel
- **Training**
  - Minimum 40 hours off-site
  - Three days field experience—minimum

# Initial Training

- **Occasional workers on-site to complete specific limited tasks**
  - Ground water monitoring
  - Land surveying
  - Geophysical surveying
- On-site workers unlikely to be exposed over permissible exposure limits (PEL).
- **Training**
  - Receive 24 hours of instruction off-site.
  - One day actual field experience.

# Initial Training

- **Regular on-site workers**
  - Exposures under PEL and respirators not required.
- **Training**
  - Receive 24 hours of instruction off-site.
  - One day actual field experience.

# Initial Training

- **Workers with 24 hours of training**
  - Who become general site workers or are required to wear respirators.
- **Training**
  - Receive 16 additional hours of instruction off-site.
  - Two days of actual field experience.



# Initial Training

- **Management and supervisors**
  - Supervise employees engaged in hazardous waste operations.
- **Training**
  - Receive 40 hours of instruction off-site
  - Three days of actual field experience
  - Training may be reduced to 24 hours and one day if only responsible for:
    - Workers on site occasionally
    - Worker's exposures under permissible exposure limits

# Qualifications for Trainers

- Trainers shall be qualified to instruct employees about the subject matter that is being presented.
- Instructors shall be competent and knowledgeable in subject matter.
- Means possessing the skills, knowledge, experience, and judgment to perform assigned tasks or activities satisfactorily as determined by the employer.
- Qualifications shown by academic degrees, completed training courses and/or work experience.
- OSHA does not certify instructors.

# Training Certification

- **Certification**
  - Employees shall be certified by an instructor as having completed the training.
    - Those not certified are prohibited from engaging in hazardous waste operations.
  - Written certificate

# Equivalent Training

- Employers who can show documentation or certification that an employee has equivalent training and/or work experience.
  - Initial training not required.
- Employees new to a site must receive site-specific training before entry.
- Equivalent training includes any academic training or the training that existing employees might have already received from actual hazardous waste site experience.

# Refresher Training/Recordkeeping

- Employees, managers, and supervisors shall receive **eight** hours of refresher training annually.
- Training records **should** be maintained for a minimum of **five years** after the training date.



# Computer/Video-based Training

- Can it be used as part of an overall training program?
- Employer must assure employee has sufficient knowledge/skills.
- Instructor must be available to respond to questions.
- Sufficient hands-on training (e.g., first responder operations level and higher would require hands-on training).

# Training FAQ

- Hazardous waste operations and emergency response lapsed refresher training requirements.
  - Repeat of initial training must be based on the employee's familiarity with safety and health procedures used on site.
  - Employee should take next available refresher training course.

# PPE

- The purpose of PPE is to shield or isolate individuals from the chemical, physical and biologic hazards that may be encountered.



Level A



Level B



Level C



Level D



# TSD Facilities

- **Treatment, storage and disposal (TSD) facilities**
  - Under the Resource Conservation and Recovery Act of 1976 (RCRA), employers who conduct operations at TSD facilities shall implement:
    - Safety and health program
    - Hazard communication program
    - Medical surveillance program
    - Decontamination program

# TSD Facilities

- **Training program**
  - New employees
    - Initial training – 24 hours
    - Annual refresher – 8 hours
  - Current employees
    - Previous work experience and/or training
    - Annual refresher – 8 hours
  - Trainers
    - Completed training course
    - Competent instructional skills

# TSD Facilities

- **Emergency response plan**

- An emergency response plan developed and implemented.
- If employees are evacuated from the worksite when an emergency occurs and do not assist in handling the emergency are exempt if they provide an emergency action plan complying with 29 CFR 1910.38.
- In writing and available for inspection.

# Emergency Response

- **Training**
  - Based on the duties and function to be performed by each responder of an emergency response organization.
  - Shall receive training or demonstrate competence in area of expertise.

# Emergency Response

- **Skilled support personnel**
  - Skilled in the operation of certain equipment.
  - Earth moving, digging, crane and hoisting equipment
  - Needed temporarily
  - Shall be given initial briefing on PPE, chemical hazards and duties.

# Emergency Response

- **Specialist employees**
  - Technical advisor who is trained in the hazards of specific hazardous substances.
  - Shall receive training or demonstrate competence in area of expertise.

# Emergency Response

- **First responder awareness level**
  - Individuals who are likely to witness or discover a hazardous substance release.
  - Trained to initiate an emergency response sequence by notifying the proper authorities.
  - Shall have sufficient training or demonstrate competence in areas listed in 1910.120(q)(6).
  - Shall take no further action than initiating an emergency response.

# Emergency Response

- **First responder operations level**
  - Individuals who respond to releases or potential releases of hazardous substances as part of the initial response.
  - Receive at least **eight hours** of training or have had sufficient experience to demonstrate competence in areas listed in 1910.120(q)(6)(ii).



# Emergency Response

- **Hazardous materials technician**
  - Individuals who respond to releases or potential releases of hazardous substances for the purpose of stopping the release.
  - Receive at least **24 hours** of training equal to first responder operations level and in addition, have competency in the areas listed in 1910.120(q)(6)(iii).

# Emergency Response

- **Hazardous materials specialist**
  - Individuals who respond and provide support to hazardous materials technicians.
  - Receive at least **24 hours** of training equal to technician level and in addition, have competency in the areas listed in 1910.120(q)(6)(iv).

# Emergency Response

- **On scene incident commander**
  - Individuals who assume control of the incident scene beyond the first responder awareness level.
  - Receive at least **24 hours** of training equal to the first responder operations level and in addition, have competency in the areas listed in 1910.120(q)(6)(v).

# Emergency Response Training FAQ

- HAZWOPER training requirements for hospital staff.
  - First Responder Operations level
- Training required for hospital staff that decontaminate victims.
  - Sufficient to respond in a safe and effective manner.

# Post-Emergency Response

- **Response personnel and training requirements**
  - Clean-up by workplace employees.
    - Clean-up is done on plant property using plant employees shall complete training requirements of:
      - Hand Protection (1910.138)
      - Respiratory Protection (1910.134)
      - HazCom (1910.1200)

# Trainer Qualifications & Refresher Training

- Qualifications of HAZWOPER emergency response trainers:
  - Attended course (e.g., Nat'l Fire Academy), training, academic credentials, instructional experience [1910.120(q)(7) and Appendix E].
- Refresher training
  - Annual refresher training of sufficient content and duration to maintain competencies OR demonstrate competency in those areas, [1910.120(q)(8)].

# OSHA Directives

- Hazwoper
  - [CPL 02-02-073 - Inspection Procedures for 29 CFR 1910.120 and 1926.65, Paragraph \(q\): Emergency Response to Hazardous Substance Releases, 8/27/2007](#)
  - [CPL 02-02-071 - Technical Enforcement and Assistance Guidelines for Hazardous Waste Site and RCRA Corrective Action Clean-up Operations HAZWOPER 1910.120 \(b\)-\(o\) Directive, 11/5/2003](#)
- Emergency Response
  - [CPL 02-00-094 - OSHA Response to Significant Events of Potentially Catastrophic Consequences, 7/22/1991](#)
  - [CPL 02-02-051 - Inspection Guidelines for Post-Emergency Response Operations Under CFR 1910.120, 11/5/1990](#)

# Directives address

- HAZWOPER training requirements
- Medical surveillance for emergency responders
- Skilled support personnel
- CSHO training, protection, and medical surveillance
- Incidental release verses emergency response
- Interrelationship with other OSHA standards and directives
- Unique events (e.g., terrorist attacks)
- Homeland Security Presidential Directive (HSPD-5)
- NRP and Worker Safety and Health Support Annex
- NEMP & REMPs
- “First Receivers”
- Shelter-in-place
- Leaking packages
- Methamphetamine labs & training



# OSHA On-site Consultation Program

- Free and confidential advice to small and medium-sized businesses in all states.
- On-site Consultation services are separate from enforcement and do not result in penalties or citations.
- Consultants from state agencies or universities work with employers to identify workplace hazards, provide advice on compliance with OSHA standards, and assist in establishing injury and illness prevention programs.

<https://www.osha.gov/dcsp/smallbusiness/consult.html>

# HAZWOPER Guidance from OSHA

- HAZWOPER Safety & Health Topics page
  - [www.osha.gov/emergency-preparedness/hazardous-waste-operations](http://www.osha.gov/emergency-preparedness/hazardous-waste-operations)
- OSHA's HAZWOPER Training FAQs
  - [www.osha.gov/emergency-preparedness/hazardous-waste-operations/faq](http://www.osha.gov/emergency-preparedness/hazardous-waste-operations/faq)
- Training Marine Oil Spill Response Workers under OSHA's HAZWOPER Standard
  - [www.osha.gov/publications/3172](http://www.osha.gov/publications/3172)
- Emergency Preparedness and Response Safety & Health Topic Page  
[www.osha.gov/emergency-preparedness](http://www.osha.gov/emergency-preparedness),

**Questions?**

**Give us a call  
OSHA is here to assist**

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