

Employee Training for Worksite Response and Cleanup Activities

http://www.osha.gov/dep/ohe/application_worksiteresponse.html

The training necessary for employees involved in worksite response and cleanup efforts is dependent upon the hazards at the sites and the activities and tasks the employees will perform. OSHA's HAZWOPER standard and its training requirements apply to efforts that are "HAZWOPER emergency responses" and hazardous waste site cleanups. It is important to understand that the training required for emergency response workers is quite different than that required for hazardous waste site workers. Training for both types of workers is described in the following sections.

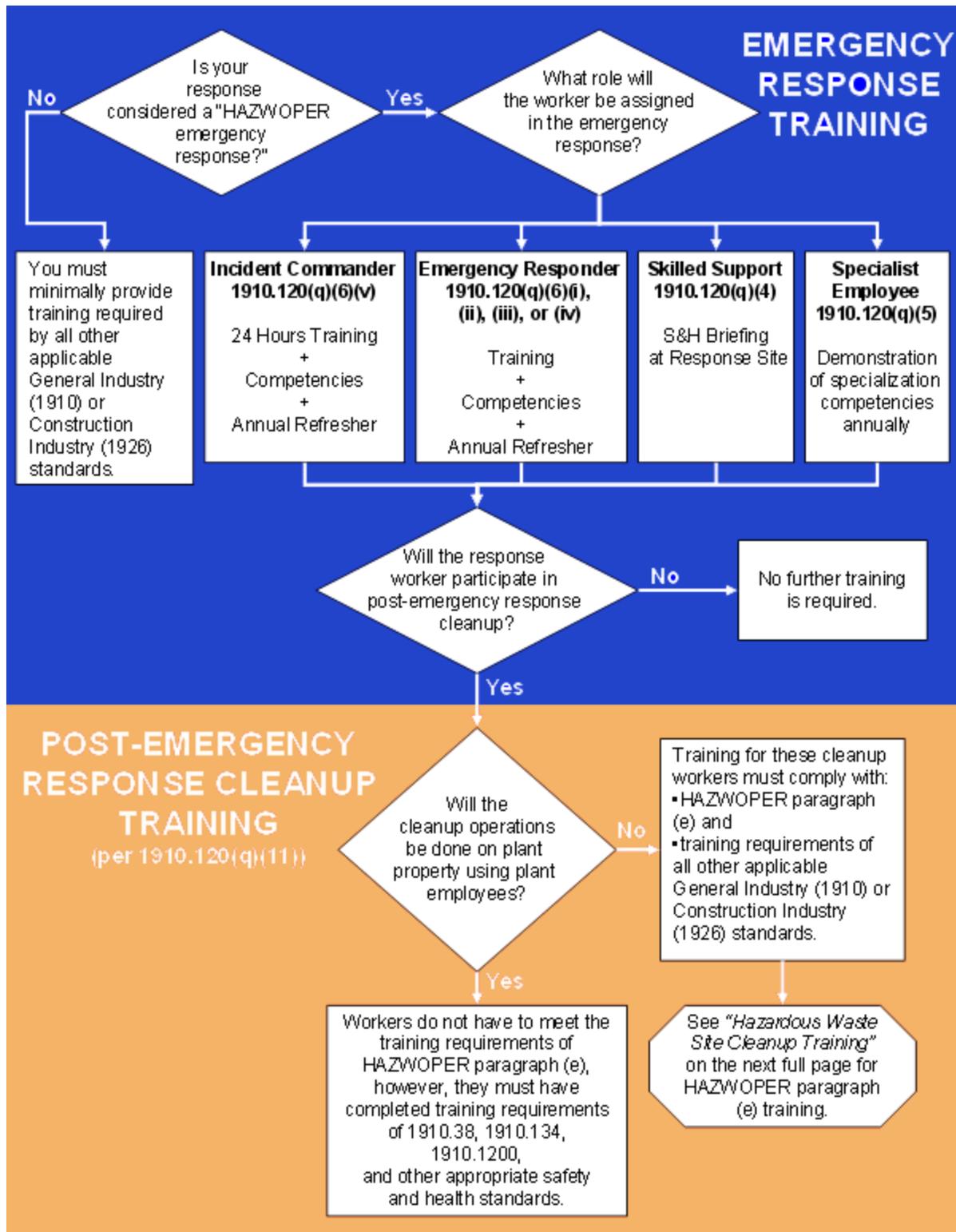
For worksite response and recovery efforts that are not covered by HAZWOPER, workers must be trained as required by any other applicable General Industry (1910) and Construction Industry (1926) OSHA standards. For example, if there is a need to enter a permit-required confined space such as a sewer manhole, the employer would need to assure that the entrant(s) and attendant(s) are properly trained according to the Permit-Required Confined Spaces standard, 29 CFR 1910.146, prior to entry into the manhole. Examples of training requirements that are likely to apply to workers involved in worksite responses include, but are not limited to, the following standards: [Hazard Communication](#) (1910.1200), [Personal Protective Equipment](#), 29 CFR 1910.132, and [Bloodborne Pathogens](#), 29 CFR 1910.1030.

EMERGENCY RESPONSE TRAINING

If it is determined that response activities are considered a "HAZWOPER emergency response," then training for workers must minimally meet the requirements of 1910.120(q). The training levels and content required for these workers is dependent on the workers' expected duties during the emergency response as shown in Figure 3. For example, workers who are likely to witness or discover a release and are expected only to initiate an emergency response by notifying the proper authorities must be trained to the first responder awareness level, 1910.120(q)(6)(i). Workers who respond in a defensive fashion without actually trying to stop the release (e.g., containing the release from a safe distance) must be trained to the first responder operations level, 1910.120(q)(6)(ii). Workers who are expected to approach the point of a hazardous substance release for the purpose of stopping the release must be trained to either the hazardous materials technician, 1910.120(q)(6)(iii), or the hazardous materials specialist level, 1910.120(q)(6)(iv). Alternatively, workers who are needed to temporarily perform immediate emergency support work (e.g., excavator operators) may be considered skilled support personnel (SSP). SSP must be provided an initial site briefing covering personal protective equipment use, the chemical hazards involved, and the tasks to be performed. Consequently, employers must evaluate the role and tasks workers will perform and train them appropriately.

POST-EMERGENCY RESPONSE CLEANUP TRAINING

All workers performing post-emergency response removal of hazardous substances, health hazards, or materials contaminated with them must receive training as required by 1910.120(q)(11), as shown in Figure 3. Upon completion of the emergency response, workers involved in subsequent cleanup or removal of hazardous substances must be trained according to HAZWOPER paragraph (e), unless they are conducting the cleanup operations at the plant property where they work. These plant employees may be trained according to 29 CFR 1910.38, 29 CFR 1910.134, and 29 CFR 1910.1200 and other appropriate safety and health training in lieu of complying with HAZWOPER (b)-(o).



HAZARDOUS WASTE SITE CLEANUP TRAINING

For worksite cleanup activities that did not originate from a "HAZWOPER emergency response" but are determined to be hazardous waste site cleanups, workers must be trained according to 1910.120(e). As with emergency response training, the level and type of training is dependent upon on the workers' expected duties and level of exposure as shown in Figure 4.

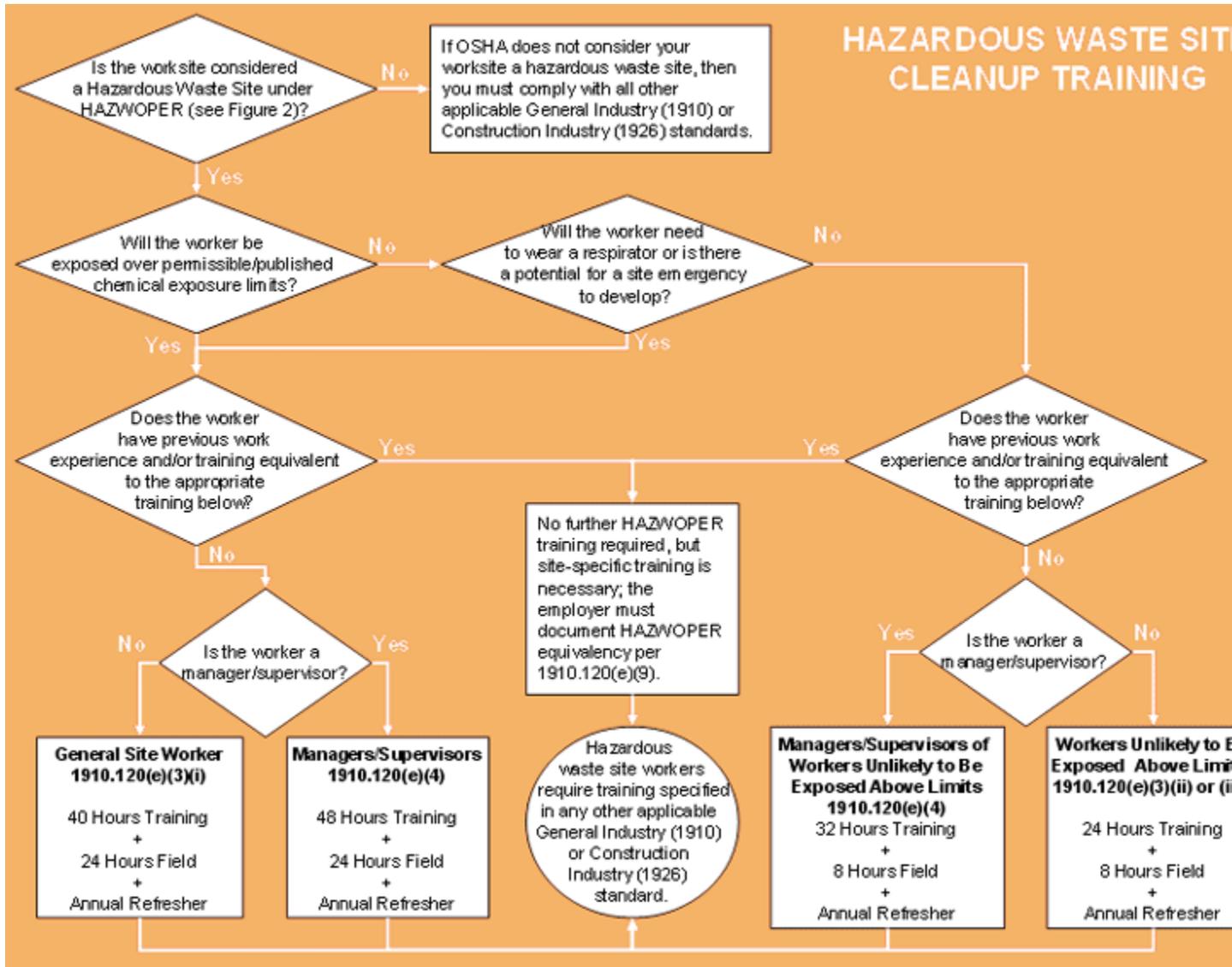


Figure 4. Hazardous Waste Site Training
[\[Text Version\]](#)

*Workers who are to be trained for a specific oil spill cleanup that involved task with minimal exposure (e.g., beach cleanup workers) may possibly be trained under a reduced OSHA training provision described in OSHA Instruction CPL 02-02-051. This instruction applies only to oil spills and is limited in circumstances.

REFERENCE MATERIALS

1. [29 CFR 1910.120 and 1926.65 – Hazardous Waste Operations and Emergency Response \(HAZWOPER\).](#)
2. [OSHA Instruction CPL 02-02-051, November 5, 1990, Inspection Guidelines for Post-Emergency Response Operations Under 29 CFR 1910.120.](#)
3. [OSHA Instruction CPL 02-02-059, April 24, 1998, Inspection Procedures for the Hazardous Waste Operations and Emergency Response Standard, 29 CFR 1910.120 and 1926.65, Paragraph \(q\): Emergency Response to Hazardous Substance Releases.](#)
4. [OSHA Instruction CPL 02-02-071, November 5, 2003, Technical Enforcement and Assistance Guidelines for Hazardous Waste Site and RCRA Corrective Action Clean-up Operations HAZWOPER 1910.120 \(b\)-\(o\) Directive.](#)
5. [Hazardous Waste Operations and Emergency Response, Revised 1997, OSHA Publication # 3114.](#)