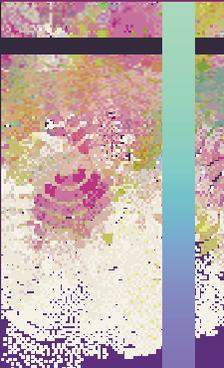




HAZWOPER Compliance Issues



National Institute of Environmental Health Sciences
Worker Education and Training Program Awardee
Meeting

April 17, 2001
Chicago, Illinois

Continuing Compliance Issues

- Lapsed Training
 - initial training
 - refresher training
- Computer Based Training
 - may be effective for classroom portion
 - “hands-on” and site-specific requirements



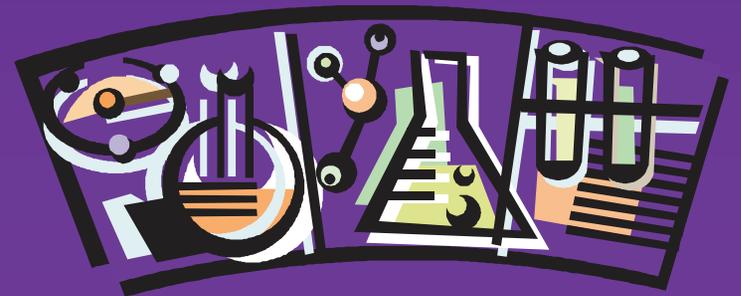
New Compliance Issues

- Chemical and Biological Terrorism
 - Training and equipping local emergency responders
 - Planning and response in medical community



New Compliance Issues

- Methamphetamine Labs
 - DOJ/DEA
 - OSHA Fact Sheet



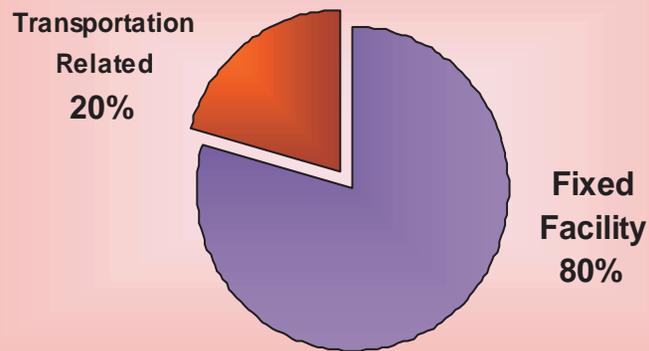
New Compliance Issues

- Brownfields Health & Safety
 - Brownfields Web Page
 - AIHce
 - brownfields compliance
 - brownfields applied health and safety
 - Brownfields poster

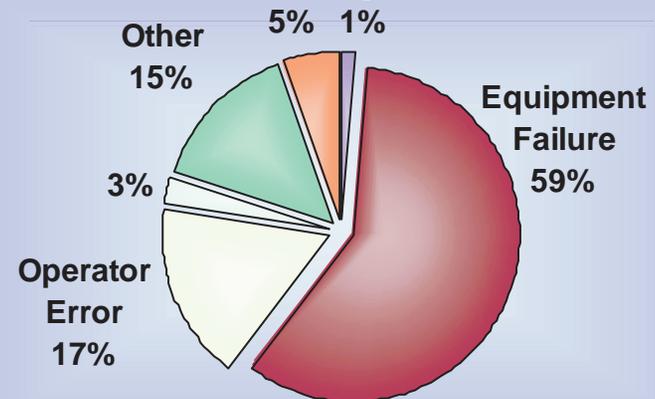


Hazardous Substance Emergencies

Hazardous Substance Emergencies



Contributing Factors



96% of the events released only a single substance

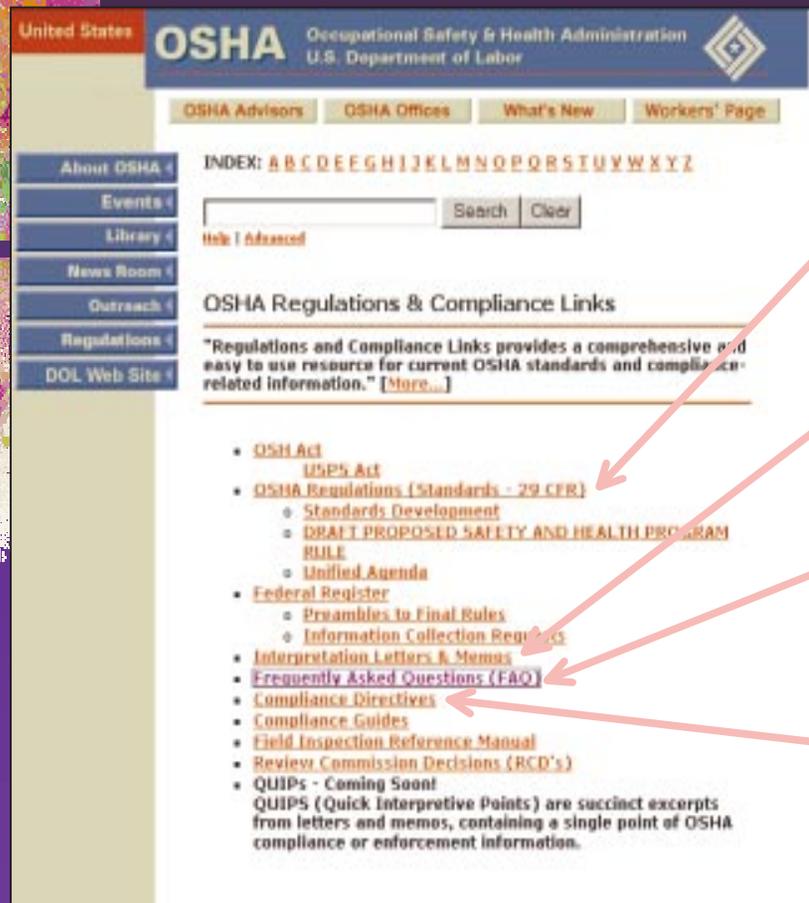
From the ATSDR Hazardous Substances Emergency Events Surveillance (HSEES) 1997 Annual Report

Other Compliance Issues

- Access to Employee Medical and Exposure Records
- Multi-employer Workplace Policy on Clean-up Sites
- Court Decision Library
- Public Sector Health and Safety
- Update to PRCS Directive



Training Resources



The screenshot shows the OSHA website interface. At the top, it says "United States OSHA Occupational Safety & Health Administration U.S. Department of Labor". Below this are navigation tabs for "OSHA Advisors", "OSHA Offices", "What's New", and "Workers' Page". A sidebar on the left contains links for "About OSHA", "Events", "Library", "News Room", "Outreach", "Regulations", and "DOL Web Site". The main content area features an "INDEX: ABCDEFGHIJKLMNOPQRSTUVWXYZ" and a search box. Below the search box is a section titled "OSHA Regulations & Compliance Links" with a description: "Regulations and Compliance Links provides a comprehensive and easy to use resource for current OSHA standards and compliance-related information." A list of resources follows, including "OSH Act", "OSHA Regulations (Standards - 29 CFR)", "Federal Register", "Interpretation Letters & Memos", "Frequently Asked Questions (FAQ)", "Compliance Directives", "Compliance Guides", "Field Inspection Reference Manual", "Review Commission Decisions (RCD's)", and "QUIPs - Coming Soon".

- [OSH Act](#)
 - [USPS Act](#)
- [OSHA Regulations \(Standards - 29 CFR\)](#)
 - [Standards Development](#)
 - [DRAFT PROPOSED SAFETY AND HEALTH PROGRAM RULE](#)
 - [Unified Agenda](#)
- [Federal Register](#)
 - [Preambles to Final Rules](#)
 - [Information Collection Requests](#)
- [Interpretation Letters & Memos](#)
- [Frequently Asked Questions \(FAQ\)](#)
- [Compliance Directives](#)
- [Compliance Guides](#)
- [Field Inspection Reference Manual](#)
- [Review Commission Decisions \(RCD's\)](#)
- [QUIPs - Coming Soon](#)

QUIPS (Quick Interpretive Points) are succinct excerpts from letters and memos, containing a single point of OSHA compliance or enforcement information.

Standards

Interpretation Letters

Frequently Asked Questions

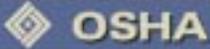
Directives

Training Resources

OSHA Standards Interpretation and Compliance Letters

Table of Contents by Year

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Occupational Safety & Health Administration
U.S. Department of Labor

[Home](#)
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[** Compliance Links FAQ Page](#)

Frequently Asked Questions: HAZWOPER

1. [Who is covered by OSHA's HAZWOPER Standard?](#)
2. [Is computer-based training acceptable for refresher training?](#)
3. [For emergency response in an unknown or potentially IDUH atmosphere, what is the minimum number of people required?](#)
4. [Can refresher training be given in segments?](#)
5. [What if refresher training isn't received in 12 months?](#)
6. [What are the training or certification requirements for HAZWOPER trainers?](#)
7. [What are the HAZWOPER training requirements for hospital staff?](#)
8. [What is the difference between an incidental and an emergency spill?](#)
9. [What are the HAZWOPER training requirements for on-site workers who are not directly involved in cleanup activities?](#)
10. [What is the applicability of HAZWOPER to small quantity generators?](#)
11. [What is the application of HAZWOPER to TSO facilities that store hazardous materials for 90 days or less?](#)

Who is covered by OSHA's HAZWOPER Standard?

The Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) applies to five distinct groups of employers and their employees. This includes any employees who are exposed or potentially exposed to hazardous substances—including hazardous waste—and who are engaged in one of the following operations as specified by [1910.120\(a\)\(1\)\(i\)-\(v\)](#) and [1926.65\(a\)\(1\)\(i\)-\(v\)](#):

- 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 the [Resource Conservation and Recovery Act of 1976 \(RCRA\)](#) as amended (42 U.S.C. 6901 et seq.);
- voluntary clean-up operations at sites recognized by federal, state, local, or other governmental body as uncontrolled hazardous waste sites;
- operations involving hazardous wastes that are conducted at treatment, storage, and disposal facilities regulated by [Title 40 Code of Federal Regulations](#) Parts 264 and 265 pursuant to RCRA, or by agencies under agreement with U.S. Environmental Protection Agency to implement RCRA regulations; and
- emergency response operations for releases of, or substantial threats of release of,

Training Resources

The screenshot shows a website titled "response resources" with a navigation menu on the left and a main content area. The navigation menu includes: "response resources", "products", "about ERT", "ROVR", "sites", "WIP", and "Quick Links". The main content area has a sub-menu with: "directories", "ERT members", "health & safety", "response & remediation", "sampling & analysis", "technical links", "TOMES", and "training". The main text under "Health & Safety:" reads: "Because the ERT's response teams are directly involved in sampling and assessment of hazardous waste, the ERT takes all necessary measures to ensure the safety of all site workers and members of the general public who live and work near the site." Below this is a list of links: "Overview", "H & S Document Production", "H&S Task Force" (with sub-links: "Updates", "Drafts", "TF Meetings", "Other Documents"), "H&S Trainings", "Related Information Services", and "H&SIP". A "Current H & S Alert" section mentions: "The next AH&C will be in New Orleans, LA, June 2-7, 2001." At the bottom, there is a "Contacts:" section and a "Last Revised: 27 Mar 2001 12:17:50 PM" timestamp.

HAZWOPER Resources

Task Force Newsletter

E-HASP & E-PRCS

Brownfields

Training Resources

**OSWER
and
Labor
Union**

Members

- ▶ CPWR
- ▶ DOE
- ▶ EPA
- ▶ IAFF
- ▶ IUOE
- ▶ LIUNA
- ▶ NEHC
- ▶ NIEHS
- ▶ NIOSH
- ▶ OSHA
- ▶ Teamsters
- ▶ USACE

Health & Safety Task Force

Online Resources and Other Information

Welcome



Explore the Safety & Health Resources for Hazardous Materials

These web pages, supported by the OSWER and Labor Union Health and Safety Task Force, provide members, employers, and workers information and links to sites related to hazardous materials clean-up, handling, disposal, and emergency response.

Various aspects of the Task Force include:

- [Mission](#)
- [Background](#)
- [Purpose](#)
- [Task Force Updates](#)

Last Update: 08/10/00

OSWER and Labor Union Health & Safety Task Force

RCRA 150 Facility Resources



Treatment, Storage and Disposal

Federal Agency Standards

- **OSHA**
 - [29 CFR 1910.120\(a\)](#), Hazardous Waste Operations and Emergency Response, Certain Operations Conducted Under the Resource Conservation and Recovery Act of 1976 (RCRA).
- **EPA**
 - [40 CFR Part 264](#), Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities. (pdf)
 - [40 CFR Part 265](#), Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities. (pdf)

Publications

- [RCRA and UST Training Modules](#), EPA Office of Solid Waste (October 1999)
- [Hazardous Waste Operations and Emergency Response](#), OSHA Booklet 3114 (1997)
- [OSHA's HAZWOPER Frequently Asked Questions](#)

Hotlines & Other Contacts

- [OSHA Regional & Area Offices](#)
- [OSHA Consultation Offices](#)
- [OSHA Compliance Guidance Group](#), an OSHA-funded phone service to help employers with OSHA compliance. Phone: 301/515-6796
- [OSHA Fatalities & Imminent Danger Hotline](#)
- [MOSH Hotline](#), Chemical and Physical Hazards. Phone: 800/368-4674

Training Resources

EPA/Labor Superfund Health & Safety

Task Force update

OSHA Occupational Safety and Health Administration
Fall 2000

THE EPA/LABOR TASK FORCE

The EPA/Labor Superfund Health and Safety Task Force includes members representing the EPA, OSHA, NIOSH, the Laborers' International Union of North America, the International Association of Firefighters, the International Brotherhood of Teamsters, the International Union of Marine Workers, the International Union of Operating Engineers, the AFL-CIO's Center for United Workers' Rights, and the Navy Environmental Health Center. Its function is to promote awareness of and promote solutions to hazardous waste site and emergency response health and safety issues. The Task Force's objectives include:

- identifying health and safety issues in hazardous waste operations and emergency response sector;
- seeking regulatory, institutional emergency resolutions to such issues; and
- communicating this information broadly within the industry sector.

OSHA's Office of Health Compliance Assistance (OHCA) represents OSHA on the Task Force and prepares the quarterly Update newsletter. Update is written to inform Task Force members of HAZWOPER-related activities within their own organizations.

Filling a Gap in Brownfields Information

Targeted brownfields health and safety information is hard to find, but increasingly in demand because of the growing number of brownfield assessment and cleanup sites across the country.

For this reason, OSHA is preparing a new webpage that addresses worker health and safety at Federal Brownfields and State Voluntary Cleanup Program sites. The page is designed as a focused source of information for employees, employers, and government entities that are or will be working on brownfields. One of the essential elements of this webpage is a Question and Answer (Q & A) document to provide guidance on OSHA requirements that apply during assessment and cleanup.

The Q&A document is the first compliance guidance OSHA is preparing for brownfields. One of its key purposes is to help employers establish effective worker protection programs on sites where contamination may be low, but contractual requirements may mandate implementation of HAZWOPER. The document also

addresses the roles of different agencies involved in Federal Brownfields and State Voluntary Cleanup Programs, including their involvement in health and safety oversight.

(Continued on Page 2)

DRAFT

OSHA Clarifies Position on Use of APRs

In a press release dated September 8, 2000, OSHA announced clarification of its policy on the use of air purifying respirators (APRs). The clarification was issued July 18, 2000, after a press release and letter to attorneys general that are not chemicals with acute toxicity used if the respirator is used. Service can monitor (SLI) or will contain a change schedule for over a life.

Project Briefs

Brownfield, Remediation and Worker Health and Safety - A new report from the OSHA/Labor Task Force is available. On October 11, 2000, the OSHA/Labor Task Force issued a report titled "Brownfield, Remediation and Worker Health and Safety." The report is available at www.osha-slc.gov. The report is available in both English and Spanish. The report is available in both English and Spanish. The report is available in both English and Spanish.

(Continued on Page 3)

DRAFT

EPA OSHA

HASP

E-HASP Beta Version 1.3

About E-HASP

Test of CLEAR/CDER Standard

EPA OSHA

PRCS

e-PRCS Beta Version 1.0

About e-PRCS

Test of PRCS Standard (1910.146)

Prepare a Site Specific PRCS Program

Confined Spaces Resources

QUIT

Thank You!

