

Ohio Environmental Protection Agency
Safety Office
Safety Standard Operating Procedure Number: SP 10-18
Date: November 29, 2013

STATUS: FINAL

Title: HAZWOPER Training

1. Purpose:

The purpose of this Safety Standard Operating Procedure (SSOP) is to ensure that staff who are performing work on sites covered under OSHA's HAZWOPER standard (29 CFR 1910.120) receive the required training as specified in the OSHA standard.

2. Reference:

OSHA's Hazardous Waste and Emergency Response Operations Standard, 29 CFR1910.120 (HAZWOPER)

3. Training Requirements:

- A. Compliance with the HAZWOPER training requirements is mandatory for staff that will be performing work at the following locations 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:
 - 1. 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 (including, but not limited to, the EPA's National Priority Site List (NPL), state priority site lists, sites recommended for the EPA NPL, and initial investigations of government identified sites which are conducted before the presence or absence of hazardous substances has been ascertained).

2. 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*);
3. Voluntary clean-up operations at sites recognized by Federal, state, local or other governmental bodies as uncontrolled hazardous waste sites
4. Operations involving hazardous waste that are conducted at treatment, storage, disposal (TSD) facilities regulated by 40 CFR Parts 264 and 265 pursuant to RCRA; or by agencies under agreement with U.S.E.P.A. to implement RCRA regulations
5. Emergency response operations for releases of, or substantial threats of releases of, hazardous substances without regard to the location of the hazard.

Note for Supervisors and Managers: Supervisors who will be performing direct field supervision during projects at the above locations are required to meet the training requirements.

Supervisors and managers who may visit sites on occasion to provide oversight are not required to meet these training requirements as long as they will remain in the “support” zone at such sites. Supervisors and managers who have not met the training requirements are not permitted to enter the “exclusion” zone at such sites and are not permitted to participate in any activities where there is a potential for exposure to the hazards located on-site.

- B. All staff that will be performing work at sites covered under OSHA’s HAZWOPER standard will be required to attend an approved OSHA 40 Hour class prior to performing any work at covered sites. This training may be completed at the U.S. EPA Training Center in Cincinnati, Ohio, or at other training locations in the State. The Agency Safety Program Manager should be consulted prior to utilizing training sources other than the U.S. EPA Training Center.
- C. Upon completion of the 40 Hour course, staff will be required to perform three (3) days of work under the direct supervision of a qualified individual.

- D. Staff will then be required to complete a minimum of eight (8) hours of refresher training annually while their work assignments include performing work at HAZWOPER sites.
- E. The Safety Management System (SMS) should reflect the HAZWOPER training requirement for all staff that perform work under the standard.
- F. If an employee is hired or transferred into a position which requires HAZWOPER training and the employee has previously completed the OSHA 40 Hour training there is no need to repeat the 40 Hour even if the employee has not completed the 8 Hour Refresher training requirement each year. In such cases the new supervisor will need to determine if the employee has retained sufficient knowledge from the 40 Hour training. If sufficient knowledge has been retained the employee will be required to complete 8 hours of Refresher training as soon as possible after the hire/transfer date. From that point on the normal 8 Hour Refresher training requirements would then apply. If the supervisor determines that sufficient knowledge has not been retained, the employee will need to repeat the OSHA 40 Hour training.

4. Procedure for Documenting Annual Refresher Training

- A. Once staff have completed the initial training requirements for working on HAZWOPER locations, a minimum of eight (8) hours of refresher training is then required on an annual basis.
- B. The eight (8) hours of refresher training is due twelve (12) months following the completion of the OSHA 40 hour training or the last annual refresher training date.

Example #1 –The OSHA 40 hour training was completed on February 15, 2013. The annual refresher training is then due on February 15, 2014.

Example #2 – The last annual refresher training requirement was completed on December 1, 2013. The next annual refresher training date is December 1, 2014.

- C. Effective in 2014 staff in this program are no longer required to submit a form each time training has been completed. Instead, one form is to be submitted to the Agency Safety Manager once the minimum of eight (8) hours of refresher training is completed. The form can be found as attachment 1 to this SSOP.
- D. The form needs to be reviewed and signed by the immediate supervisor prior to sending it in to the Safety Manager.
- E. Supervisors should review the training received to be sure that the training received is applicable to the HAZWOPER standard and to the duties that the employee will be performing on HAZWOPER sites.

- F. The Safety Manager will review all submitted forms and update the Safety Management System (SMS) with the new completion date. This date will be the anniversary date for the training for the following year.
- G. Supervisors should ensure that employees are not permitted to work on HAZWOPER sites if they have not met the minimum annual training requirement in a timely manner.

5. Approved HAZWOPER Refresher Training:

- A. The following training is pre-approved for HAZWOPER Refresher training credit:

1. Annual SCBA/HAZMAT Training (4 hours)
2. Annual Respirator Fit Testing and Refresher Training (1 hour)
3. Initial Respirator Fit Testing and Initial Respirator User Training (2 hours)
4. Evidence Response Team (ERT) Training (3 hours)
5. Radiation Assessment Team (RAT) Training (3 hours)
6. Confined Space Entry Team Training (3 hours)
7. CPR/First Aid Training (3 hours)
8. Field Safety Orientation for New Field Staff and Supervisors (2 hours)

- B. HAZWOPER training hours will also be approved and issued for the following:

1. Attendance at Safety Discussions/Training during staff meetings (maximum of 3 hours in any given calendar year)
2. Attendance at BWC Training courses (credit dependent on actual length of training)
3. Viewing safety/health related videos (credit based on actual time spent, maximum of 4 hours in any given year)
4. Completion of on-line training courses through OSHA, BWC, ERTP, or other sources (credit based on actual time spent)
5. Participation in pre-job planning sessions discussing safety and/or health concerns (credit based on actual time spent. Maximum of 2 hours in any given calendar year)
6. Attendance at Agency provided HAZWOPER refresher training opportunities (credit based on actual length of training)
7. Other safety and/or health training approved by the Agency Safety Program Manager (credit based on actual length of training)
8. Applicable training received at the Ohio BWC Safety Congress (credit based on length of sessions attended)

9. Attendance at an OSHA 8 Hour Refresher Training course presented by BWC, University of Findlay, Sinclair College, Columbus State, or any other institution of higher learning.

