

OSHA Instruction CPL 2.70

Directorate of Field Operations

Appendix B

RCRA and CERCLA Legislation

In response to the problems of hazardous waste the Congress enacted the Resource Conservation and Recovery Act of 1976, 42 U.S.C. 6901 et seq., as amended (RCRA.) In enacting this statute the Congress found, among other things, that "(2) disposal of solid waste and hazardous waste in or on the land without careful planning and management can present a danger to human health and environment", 42 U.S.C. 6901 (B) (2); "(3) inadequate and environmentally unsound practices for the disposal or use of solid waste have created greater amounts of air and water pollution and other problems for the environment and health", 42 U.S.C. 6901(b) (3); and "(5) the placement of inadequate controls and hazardous waste management will result in substantial risks to human health and the environment", 42 U.S.C. 6901(b) (5). In that statute the Congress also provided:

"In order to assist the Secretary of Labor and the Director of the National Institute for Occupational Safety and Health in carrying out their duties under the Occupational Safety and Health Act of 1970, 29 U.S.C.A. 651 et seq., the Administrator of the EPA shall:

1. Provide the following information, as such information becomes available, to the Secretary and the Director:
 - (A) the identity of any hazardous waste generation, treatment, storage, disposal facility or site where cleanup is planned or underway;
 - (B) information identifying the hazards to which persons working at a hazardous waste generation, treatment, storage disposal facility or site or otherwise handling hazardous waste may be exposed, the nature and extent of the exposure, and methods to protect workers from such hazards; and
 - (C) incidents of workers' injury or harm at a hazardous waste generation, treatment, storage or disposal facility or site;
2. Notify the Secretary and the Director of the Administrator's receipt of notification under section

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6930 or reports under section 6922, 6923 and 6924 of this title and make such notifications and reports available to the Secretary and the Director."

In 1980 the Congress passed the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. 9601 et seq. ("CERCLA" or "Superfund"). In enacting this legislation the House Committee on Interstate and Foreign Commerce declared:

Since enactment of that law RCRA, a major new source of environmental concern has surfaced: the tragic consequences of improperly, negligently, and recklessly hazardous waste disposal practices known as the "inactive hazardous waste site problem." The unfortunate human health and environmental consequence of these practices has received national attention amidst growing public and Congressional concern over the magnitude of the problem and the appropriate course of response that should be pursued.

House Report No. 96-1016, Part I, 1980 U.S. Code Congressional and Administrative News, p. 6120.

In 42 U.S.C. 9611(b) the Congress authorized use of the Superfund for "...the cost of a program to protect the health and safety of employees involved in response to hazardous substance release." In that provision the Congress also stated:

Such program shall be developed jointly by the Environmental Protection Agency, the Occupational Safety and Health Administration and the National Institute for Occupational Safety and Health and shall include, but not be limited to, measures for identifying and assessing hazards to which persons engaged in removal, remedy, or other response to hazardous substances may be exposed, methods to protect workers from such hazards, and necessary regulatory and enforcement measures to assure adequate protection of such employees.

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U.S. Department of Labor

Assistant Secretary for
Occupational Safety and Health
Washington, D.C. 20210



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Subject: Technical Assistance and Guidelines for Superfund
and Other Hazardous Waste Site Activities

- A. Purpose. This instruction provides direction for OSHA compliance personnel in providing technical assistance to or in conducting enforcement activities at hazardous waste sites.
- B. Scope. This instruction applies OSHA-wide.
- C. Cancellation. OSHA Instruction CPL 2-2.37, December 30, 1983, is canceled.
- D. References.
 - 1. OSHA Instruction CPL 2.70, Special Emphasis Program: Hazardous Waste Sites, January 29, 1986.
 - 2. OSHA Instruction CPL 2.74, Hazardous Waste Site Activity Worksheet, OSHA-Form 175, January 29, 1986. ✓
- E. Action. OSHA National Office Directors, Regional Administrators and Area Directors shall ensure that OSHA activities regarding employees working at hazardous waste sites is consistent with the guidelines in G, H and I of this instruction.
- F. Federal Program Change. This instruction describes a Federal program change which affects State programs. Each Regional Administrator shall:
 - 1. Ensure that this change is forwarded to each State designee.
 - 2. Explain the technical content of the change to the State designee as requested.
 - 3. Explain that the Assistant Secretary has determined that coverage of Superfund sites within the State plan States is a severable issue as defined by 29 CFR 1902.2(c).

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- a. As a result, OSHA Instruction CPL 2-2.37, December 30, 1983, gave State plans the option of covering such waste sites within their respective jurisdictions.
 - b. All State plans, however, were required to provide enforcement coverage of Superfund and non-Superfund sites where cleanup will be done by State or local government employees.
 - c. All State plans also retained jurisdiction over all hazardous waste sites not designated as Superfund sites by EPA.
4. Ensure that the State designees are asked to acknowledge receipt of this Federal program change, in writing within 30 days. This acknowledgment shall also include a description of their plans to implement this change appropriate to their level of waste site coverage.
 5. Ensure that, within 6 months of forwarding this instruction, the applicable guidelines in this Federal program change (or its equivalent) are implemented and a plan change supplement is submitted to the Region for review and processing.
 6. Advise the State designees that advisory and technical assistance can be provided to the State by Federal OSHA in accordance with the guidelines in G of this instruction.

✓ G. Background. EPA is the lead Superfund and RCRA agency. OSHA and EPA have agreed that OSHA has the lead role in providing for the safety and health of workers at hazardous waste sites.

1. Under the National Emphasis Program (NEP) for the inspection of hazardous waste sites OSHA will be targeting enforcement activities at Superfund and RCRA sites.
2. Technical assistance may be provided by OSHA at some hazardous waste sites at the request of EPA or another lead agency, such as the U.S. Coast Guard.

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3. OSHA actions shall, at all times, be closely coordinated with EPA.

- a. Because of the hazards involved at each of the sites (not only to workers involved in cleanup but also to the public), OSHA recognizes the need for expeditiousness in the cleanup process.
- b. OSHA activities, therefore, shall not unnecessarily hinder removal or remedial actions. At the same time they shall ensure that workers' safety and health are not compromised.

H. Enforcement Activities. Normal OSHA inspection procedures shall be followed when handling NEP inspections, referrals, complaints or accident reports at Superfund sites, RCRA sites or other hazardous waste sites, except that only trained personnel are to be sent to these sites. (See I of this instruction.)

1. Preinspection Planning. Area Directors, upon scheduling a hazardous waste site for inspection and prior to initiating the inspection, shall contact the local EPA official to discuss appropriate levels of personal protective equipment for CSHO's and workers, the site's history and current status (whether the site is active) and whether workers are at the site prior to initiating the inspection.

- a. If workers are at a RCRA site, a copy of the drawing of the facility from EPA's RCRA permit application and other material which may be helpful in planning the inspection shall be obtained. ✓
- b. If workers are at a Superfund site, a copy of the site safety plan and any other information considered pertinent shall be obtained for review before going onsite.

2. Complaints. CSHO's shall immediately notify the Area Director whenever a hazardous waste site is discovered during a routine inspection or when complaints are received on such subject areas.

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3. On-Site Coordination. CSHOs shall coordinate activities with EPA, Corps of Engineers, or other agency representatives, if present.
4. Applicable Standards. Depending on the activities occurring at the site, the general duty clause or the general industry and/or construction standards may be applicable.
5. Examples of Health Standards. The nature of hazardous waste site environments dictates that the following items must be specifically evaluated for their effectiveness in addition to ensuring compliance with all other applicable standards.
 - a. Respirators. This includes the use of respirators during emergency evacuation as well as routine work activity (e.g., 29 CFR 1910.134, 1926.103).
 - (1) Policy. When an overexposure cannot be documented through full-shift or ceiling sampling but a realistic potential for a sudden or intermittent overexposure is reasonably foreseeable, violations of 1910.134 or, if applicable, 1926.103 shall be cited. Violations shall be classified as serious when serious physical harm or death could result from the overexposure.
 - (2) Policy Rationale. The air quality at hazardous waste sites is subject to sudden, dramatic changes due to the often highly toxic materials present and the nature of activities carried out. Frequently the identity and quantity of particular chemical species are not known to personnel at a site. Reactions between materials at a site may even create new air contaminants. Hazardous waste sites may present situations where 8-hour sampling is not feasible due to practical limitations or because CSHOs may be unacceptably endangered.

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(3) Documentation. Documentation for violations where overexposures are not established through sampling must include consideration of all of the elements normally required for citations of the general duty clause, as follows:

(a) Substances present:

- 1 The extent to which specific chemicals can be identified.
- 2 Warning properties.
- 3 Eye irritation potential.
- 4 The potential for interaction between substances present to create new airborne contaminants.
- 5 Cartridge/cannister break-through potential.
- 6 Physical properties such as vapor pressure, lower explosive limit, and particle size.
- 7 Toxicity.

(b) The potential for sudden releases of airborne concentrations of contaminant(s).

(c) Adequacy of any existing respirator programs.

(d) The extent and results of any employer-conducted environmental monitoring.

(e) The extent and results of any medical surveillance/ biological monitoring.

(f) Actual employer knowledge.

(g) Industry practice.

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- b. Protective Clothing and Equipment. Examples include 29 CFR 1910.132, 1910.133, 1910.1003(c)(5), 1910.1018(g), 1926.28 and 1926.102. Among the considerations for such potential citations are the following:
 - (1) Industry practice.
 - (2) Suitability for hazards likely to be encountered (e.g., permeability, durability, flammability, ease of decontamination).
 - (3) Availability and capacity of emergency eyewash and shower facilities.
- c. Decontamination Procedures. Examples include 29 CFR 1910.132(a), 1910.141, 1910.1003(c)(5), 1910.1003(d)(3), 1910.1018(k) and 5(a)(1) of the OSH Act. In addition to workers' clothing and equipment, contaminated heavy equipment, such as trucks and earth moving vehicles, may also be a source of employee exposure and must be considered when addressing the issue of decontamination. Documentation of violations must include the following considerations:
 - (1) Industry practice.
 - (2) Existence and appropriateness of any standard operating procedures.
 - (3) Quantitative data such as water samples, soil samples, wipe samples and discarded clothing samples.
- d. Heat Stress. At the present time, violations relating to heat stress shall be cited under the general duty clause. Employees shall be interviewed to determine if they have experienced any signs or symptoms of heat stress. In addition, CSHO's shall evaluate the potential for heat stress hazards. Criteria include:

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- (1) Employee training in the recognition of the symptoms of heat stress.
 - (2) Existence and use of appropriate work-rest regimens.
 - (3) Availability of proper first aid treatment and personnel who are trained and able to administer such treatment.
 - (4) Cool rest areas located in "clean zones".
 - (5) Environmental conditions.
 - (6) Whether or not heat stress monitoring is conducted; i.e., heart rate, body temperature, body water loss.
6. OSHA Form 175. The hazardous waste site activity worksheet shall be completed according to OSHA Instruction CPL 2.74.

I. Technical Assistance.

1. Regional Office technical staff and members of the OSHA Health Response Team (HRT) will provide the main services of onsite health and safety advice and consultation. This includes providing assistance in conjunction with the State in those States which choose to cover Superfund sites and directly in those which elect not to cover Superfund sites. Whenever EPA or another agency, such as the U.S. Coast Guard, requests OSHA's safety and health assistance, the procedures will be as follows:
 - a. The Regional Administrator shall coordinate onsite technical assistance with the HRT and the requesting agency. To the extent possible, the technical assistance team shall also provide onsite technical assistance on request to State plan States that have elected to cover Superfund sites.

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- b. The extent of onsite technical assistance shall be determined on a case-by-case basis.
 - c. If the Regional Administrator determines that an onsite evaluation will not be required, the request may be handled by the Regional staff or may be referred to the Area Office for handling under the full-service program.
2. Cost Reimbursement Procedures for Superfund Site Technical Assistance Activities. Activity of all personnel associated with Superfund onsite technical assistance requests should be charged to cost center 037 consistent with OSHA Notice FIN 20.
- 1. Reimbursable items include:
 - ✓ a. Travel costs for taking the EPA's "Hazardous Materials Incident Response Operations" training course.
 - b. All travel exclusively undertaken to perform Superfund site technical assistance investigations.
 - c. Any supplies or equipment specifically purchased to fulfill OSHA's obligations in providing technical assistance at Superfund sites.
 - 2. Since EPA can reimburse OSHA only for work directly related to Superfund technical assistance requests, no charges shall be submitted for Superfund enforcement or non-Superfund sites activity. (EPA reimbursement is not available for State activity on Superfund sites.)
 - 3. OSHA will use the Hazardous Waste Site Activity Worksheet, OSHA Form 175, to track reimbursement activity. Thus, in addition to completing vouchers, the OSHA-175 shall be completed whenever requesting cost reimbursements under Superfund.

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- J. Training and Protection of CSHOs. Because hazardous waste sites may be significantly different from other industrial sites, CSHOs must be properly trained and have adequate equipment before being assigned to conduct inspections of such sites.
1. Training. The following courses must have been completed before any hazardous waste site inspection activities may be undertaken.
 - a. EPA's "Hazardous Materials Incident Response Operations" course (#165.5) held at the EPA training facility in Edison, New Jersey or other locations designated by EPA.
 - b. OSHA Training Institute "Respirator Training" course (#100-57) or an equivalent course.
 - c. An in-house training program including refamiliarization in the maintenance, use and limitations of the equipment whenever a CSHO may be required to wear self-contained breathing apparatus.
 2. Trained Personnel List. A list of the names of trained personnel will be maintained in the Directorate of Technical Support. Thus, Regional Administrators shall continually notify the HRT of any changes in the names of trained personnel available for hazardous waste response activities.
 3. Decontamination Facilities. When decontamination facilities exist at the inspection site, the CSHO's shall utilize them if, in their professional judgment, they are adequate. In the event that adequate decontamination facilities are not available, CSHO's shall adapt the prescribed methods outlined in the "EPA Hazardous Materials Incident Response Operations Training Manual" (course #165.5). If a lead agency such as the EPA or U. S. Coast Guard is involved, CSHO's shall coordinate all decontamination activities with them.
 4. Personal Protective Equipment for CSHO's. There are four levels of protection (A, B, C and D) described in the EPA Hazardous Materials Incident Response Operations Training Manual.

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- a. Because of the extreme hazards normally involved when Level A protection is prescribed, CSHOs will not be assigned to conduct inspections at sites requiring such protection and will not be equipped for entering any areas where this level of protection is required.
- b. CSHOs must, however, be equipped for entering areas requiring levels B, C or D protection.

NOTE: Whenever CSHOs wear self-contained breathing apparatus (SCBA), a "buddy system" shall be implemented wherein three CSHOs, identically equipped, shall be required--two CSHOs to make entry and a third CSHO to remain in a safe location as a standby and to assist in emergency rescue and decontamination, if necessary. Appropriately equipped and trained personnel other than CSHOs (e.g., on-scene EPA personnel) may be substituted for the required number of CSHOs under the "buddy system".

- c. At a minimum, the following equipment must be available for each CSHO who will be conducting hazardous waste site inspections:

(1) Clothing.

- (a) Nomex jumpsuit.
- (b) Chemical splashsuit, hooded, Saranex/Tyvek.
- (c) Raingear, 2-piece suit.
- (d) Hardhat, adjustable.

(2) Footwear.

- (a) Leather safety boots.
- (b) Chemically resistant boots, non-sparking, nonconductive material, 12-inch safety toe and steel shank.

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(c) Single use overboots.

(3) Eye Protection.

- (a) Safety glasses, prescription if necessary.
- (b) Safety glasses, prescription if necessary for regular use under SCBA (short leg or adapter kit).
- (c) Chemical splash goggles.

(4) Respiratory Protection.

- (a) SCBA, pressure demand, 30 min., with extra tank.
- (b) Full-face, air purifying combination canister approved for organic vapors, dust, mists and fumes, with extra canisters.
- (c) Half-face, air purifying, combination cartridges or organic vapor with dust, mist, fume pre-filter.
- (d) SCBA, emergency escape, 5 minutes.

(5) Gloves.

- (a) Cotton inner gloves (for wicking moisture under other gloves).
- (b) Neoprene/Latex, lightweight inner gloves.
- (c) Chemical, outer glove, 14-inch length, 22 ml thickness (Nitrile rubber).
- (d) Working gloves, leather.

(6) Miscellaneous Equipment.

- (a) Small explosion-proof flashlight with batteries.

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- (b) PVC bags, 8 mil.
 - (c) Sample bottles.
 - (d) Plastic bags for samples, ziplock type.
 - (e) Wipe test - Whatman 41 filter paper.
 - (f) Knife - pocket-type, folding.
 - (g) Scissors.
 - (h) Kimwipes.
 - (i) Qualitative fit test equipment.
 - (j) PVC bags - for decontamination.
 - (k) First aid kit.
 - (m) Tape, high tack adhesive, duct.
- d. The following equipment may be useful on a case-by-case basis when conducting hazardous waste site inspections:
- (1) Underwear, cotton (100%), lightweight thermal.
 - (2) Socks, cotton.
 - (3) PVC plastic drop tarps and tiedowns.
 - (4) Warning signs.
 - (5) Long-handled stiff bristled brush.
 - (6) Cold water detergent.
 - (7) Plastic buckets, 5-gallon.
 - (8) Water proof log book, pencils, and chemical resistant pens.
 - (9) Fire extinguisher, small.
 - (10) Wooden mallet.

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- (11) Polypropylene/nylon barrier rope.
- (12) Tape, barrier.
- (13) Pop-up tent.
- (14) Binoculars.
- (15) Face shield.
- (16) Walkie-talkie.

Patrick R. Tyson
Acting Assistant Secretary

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Appendix A

Further Information

If Regional Offices need more information or have questions about matters discussed in this instruction, the following references are provided:

1. Superfund, jurisdiction, etc., call OSHA's Division of Interagency Programs at FTS 523-9296.
2. Personal protective equipment, call the Directorate of Technical Support at FTS 523-7031.
3. Medical Surveillance, call the Office of Occupational Medicine at FTS 523-7047.
4. Analytical methods, sampling methods, call the Salt Lake City Laboratory at FTS 588-5287
5. Information on previous hazardous waste site activity, including standards application, PPE utilized, major contaminants, etc., call the Health Response Team at FTS 588-5896.

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2. EPA Hazardous Materials Incident Response Operations Training Manual (course #165.5).
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11. Hazardous Material Emergencies: Response and Control. John R. Cashman, Technomic Publishing Co., Inc., 1983
12. Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities. EPA/NIOSH/OSHA/USCG Interagency Document, 1985.
13. Personal Protection Equipment for Hazardous Materials Incident; A Selection Guide. DHHS Publication #84-114, October 1984.



OSHA Instruction CPL 2.74

JAN 29 1986

Directorate of Technical Support

Subject: Hazardous Waste Activity Form, OSHA 175

- A. Purpose. This instruction promulgates the Hazardous Waste Activity Form, OSHA 175, and publishes the instructions to be followed in completing the form. Its purpose is to facilitate the tracking of hazardous waste activities and reimbursable Superfund-related expenses and to provide continuing assistance to field personnel by establishing a hazardous waste site data base.
- B. Scope. This instruction applies OSHA-wide.
- C. Action. Regional Administrators and Area Directors shall ensure that the OSHA 175 form is placed into use by supervisors for all significant hazardous waste activities immediately upon their completion, and that the directions appended to this instruction are followed in completing these forms.
- D. Federal Program Change. This instruction describes a Federal program change. Each Regional Administrator shall:
 - 1. Ensure that this change is promptly forwarded to each State designee.
 - 2. Explain the technical content to the State designee, as requested.
 - 3. Ensure that State designees are asked to acknowledge receipt of this Federal program change in writing, within 30 days of notification, to the

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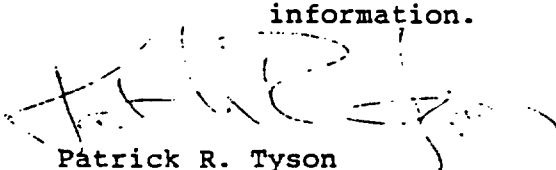
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Regional Administrator. States may adopt the OSHA 175 form, but are not required to do so. The States' acknowledgements should indicate their intent with regard to adoption of the OSHA 175 form.

4. States are strongly encouraged to participate in this aspect of the IMIS as it will facilitate the compilation of a national database on OSHA hazardous waste-related activity, to which the States will have direct computer access, and will eliminate the need for periodic requests for manual data searches in response to requests for information.


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Acting Assistant Secretary

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APPENDIX A

HAZARDOUS WASTE SITE ACTIVITY FORM, OSHA 175.

- A. General. This form shall be used by supervisors to record hazardous waste activities when Agency staff expend resources greater than two hours for any one activity.

The form must be filled out upon completion of all inspection activities, technical assistance visits, training of Agency staff, comprehensive reviews of site safety and health plans and purchases of equipment directly related to hazardous waste activities. For purposes of this form, inspection activities are to be considered complete at the time citations and proposed penalties are first issued.

Updates shall be made whenever there is new or revised information affecting the items on the form.

- B. Copies. Within five working days of completion of the activity, the form shall be mailed to the Health Response Team in Salt Lake City for inclusion into the OCIS Hazardous Waste Information File.

A copy shall be forwarded to the Regional Office.

When the Regional Office is the primary OSHA office involved in the activity, Regional Office staff may directly enter the information into the OCIS computer in Salt Lake City, using a computer terminal.

A hard copy of all forms submitted (including any which supply only update information) shall be maintained by the Regional Office.

- C. Instructions.

Note that not all items on the form apply to every hazardous waste activity, and the letters "N/A" (not applicable) may be used wherever appropriate. At the end of these instructions, examples of completed forms are provided for further clarification.

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1. NAME: Enter the name of the individual filling out the Hazardous Waste Activity Form.
2. DATE: Enter the date the form was completed, beginning with the last two digits of the calendar year followed by the numerical designations for the month and day.
3. SITE NAME AND ADDRESS: Enter the hazardous waste site name (or other relevant identifier) for the activity. If the site is a Superfund or proposed Superfund site, use the site name listed in the National Priorities List (EPA's publication HW-7.2 dated October 1984, or the latest update). Enter the street (or highway) address, city, state abbreviation, and zip code of the site name involved in the activity.
4. ESTABLISHMENT NAME AND ADDRESS: Enter the correct legal name of the establishment or contractor involved in the activity. If an OSHA-1 was prepared, the entry should be the same as entry #8 on the OSHA-1 (see ADM 1-1.12A). Enter the street (or highway) address, city, State abbreviation, and zip code of the establishment involved in the activity.
5. SIC CODE: Enter the four-digit Standard Industrial Classification (SIC) code from the SIC Manual, 1972 edition.
6. SUPERFUND: Indicate whether the activity involves a Superfund or non-Superfund site or activity by entering a check in the appropriate box.
7. TYPE OF SITE: Using 60 characters or less, enter the type of site the activity involved (e.g., old county landfill or transformer disposal on company property).
8. PRINCIPAL CONTAMINANTS: Enter the principal chemical compounds that may be present at the site and the source of that information (e.g. county records, company representative, etc.). Separate chemical names by semicolons.

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9. PRIMARY OSHA OFFICE: Enter the Region number and the name of the principal office involved in the activity. If just Regional Office staff are involved in the specific activity, enter "N/A" after "Area or District Office or State Name."
10. a. ON-SITE COORDINATOR: Enter the name and phone number of the individual identified as the lead Agency person in charge, such as the On-Scene Coordinator (the title "On-Scene Coordinator" is usually reserved for a lead individual on Superfund sites, usually a representative of the Environmental Protection Agency or the Coast Guard.)

b. ORGANIZATION: Enter the Agency name that has primary responsibility for site coordination and activity (see #10 a., above).
11. LOCAL OSHA CONTACT: Enter the name and office phone number (note if FTS) of the Agency individual primarily involved in the activity who could be contacted for more information. If the name of the individual is the same as the person filling out the form, enter a "1".
12. OTHER OSHA ORGANIZATIONS INVOLVED: Enter the office name of other Agency staff significantly involved in the specific activity (e.g., Health Response Team, Regional Office or Salt Lake City Laboratory). If no other office was involved enter "N/A."
13. PERIOD OF ACTIVITY: Enter the starting and completion dates of the activity, beginning with the last two digits of the calendar year, followed by the number of the month and then the day (e.g., 85 06 10 for June 10, 1985).
14. CONTACT: Enter the name and office phone number (note if FTS) of the Agency staff significantly involved in the activity as identified in #12. If #12 has an "N/A" leave this space blank.

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15. UPDATE: Indicate whether this form is an update to a previous form or a new entry. If the information is an update to a previous form, enter only the site and establishment names (or other identifiers) and the updating information.
16. TYPE OF ACTIVITY: Indicate the type of activity that has been accomplished. If the activity falls under two areas, such as a technical visit and a site plan review, submit two separate forms (individual forms must be used to record the different activities being tracked). When the activity is approved training, always report this as a Superfund-related action.
17. EMPLOYEE INFORMATION: On the first line enter the number of employees covered by the activity. If the activity is an inspection, this number is the same as #27 on the OSHA-1 form (see ADM 1-1.12A). On the second line enter the number of employees employed by the establishment working on cleaning up the site. If the activity is an inspection, this number is the same as #26 on the OSHA-1 form. On the third line, enter the number of employees controlled by the employer at this site and all other domestic locations. If the activity is an inspection, this number is the same as #28 on the OSHA-1 form.
18. TYPE OF RESPONSE: Indicate the type of response necessary to perform the activity. Only one entry should be made for each of the columns "a", "b", and "d" as appropriate. In column "c" two entries will be necessary, if the activity was classified as providing technical assistance. (If the activity was an inspection, only one entry should be made for either "Partial" or "Comprehensive.")
19. PRINCIPAL CITATIONS: When an inspection results in the issuance of citations, enter the specific Code of Federal Regulations number cited, followed by the general subject area of the citations. If additional room is necessary, enter the additional material on the back side of the form labeled "Review Comments."

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20. EXPENDED RESOURCES

- a. COST CENTER: Enter the appropriate three digit cost center number.

If the activity was Superfund-related, use the cost center number 037, consistent with OSHA Notice FIN 20. Since, under current policy, EPA can reimburse OSHA only for work directly related to Superfund technical assistance requests, no charges shall be submitted to cost center 037 for any non-Superfund activities or for travel costs associated with Superfund enforcement actions. These costs shall instead be charged to your office's assigned cost center. EPA reimbursement is not available for any State activity on Superfund sites.

Reimbursable items to be reported under cost center 037 (i.e., only Superfund-related expenditures) include, but are not limited to:

- travel costs for taking EPA's Hazardous Materials Incident Response Operations Training Course;
- all travel exclusively undertaken to perform Superfund site technical assistance investigations; and,
- any supplies or equipment specifically purchased to fulfill OSHA's obligations in providing technical assistance and/or enforcement at Superfund sites.

- b. TOTAL PERSONNEL HOURS: Enter the total number of hours that all non-clerical staff spent on the specific activity, including time spent on travel. If the activity does not involve a site visit or inspection, enter the time after the heading labeled "PRESITE" (record the time in half-hour increments as noted in ADM 1-1.12A for the OSHA-31 (F) form).

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- c. DIRECT COSTS: Enter the number of dollars spent on equipment or travel for the activity. "Equipment costs" refers to equipment purchased by the office for the particular activity described. "EXPENDABLE EQUIPMENT" is equipment that can only be used once (e.g., disposable protective suits, gloves or detector tubes). "NON-EXPENDABLE EQUIPMENT" is all other equipment. Travel costs should reflect the total costs of travel, including the costs of airline tickets.

(NO COST INFORMATION IS REQUIRED FOR ANY NON-SUPERFUND ENFORCEMENT ACTIVITIES.)

21. ABSTRACT: Using 700 characters or less, prepare a brief paragraph to include a description of the site, condition of the grounds and containers, specific activities performed for this submission and the PPE and equipment utilized by the OSHA personnel. If the activity involves a site visit, describe the results of the visit (i.e. air samples taken and citations issued or recommendations made). If the activity does not involve a site visit, briefly describe the type of activity or assistance performed. In the event the form is being completed for the purpose of tracking training activities, this entry should include the name(s) and office address(es) of the person(s) receiving the training, their specialty (health or safety), and the nature and location of the training. If the form is being used to track equipment purchases, list the equipment purchased and the individual cost for each item.

22. REFERENCES:

- a. OSHA INSPECTION NUMBER AND REPORTING I.D. NUMBER: If an inspection was made, enter the pre-printed inspection number and the Reporting I.D. number from the OSHA-1 form.
- b. SITE SAFETY PLAN: Indicate whether a copy of the Site Safety Plan for an individual site was obtained, and if so, indicate its location (Regional or Area Office) and the name and affiliation of the preparer.

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- c. OTHER DOCUMENTS: Enter the title, source and location of other significant documents that members of the Agency acquired during the course of the activity. Other documents may include reports such as contractor or employer air monitoring results or other governmental reports from EPA or the Coast Guard. It is especially important to enter information for those documents that may be useful to other CSHO's conducting similar inspections.

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DPMC-13840

EXAMPLE OF HOW TO FILL OUT THE HAZARDOUS WASTE
ACTIVITY FORM FOR TRAINING EXPENSES

*** NOTE: The following entries are all that need to be made
when completing this form to track training
expenses.

1. NAME: Cindy Superfund
2. Date: 85/06/23
6. SUPERFUND: YES
9. PRIMARY OSHA OFFICE:
 - a. REGION NUMBER: 10
 - b. AREA OR DISTRICT OFFICE NAME: Boise Area Office
14. PERIOD OF ACTIVITY COVERED BY THIS FORM: 83/03/06 -
83/03/11
16. TYPE OF ACTIVITY: Training
20. a. COST CENTER: 037
b. ONSITE: 56 hours
c. TRAVEL: \$845.00
21. ABSTRACT: Cindy Superfund (Health)

Hazardous Materials Incident Response Operations
Training Course, Edison, NJ

EXAMPLE OF HOW TO FILL OUT THE HAZARDOUS WASTE
FORM FOR THE PURCHASE OF EQUIPMENT RELATED TO SUPERFUND
ACTIVITIES

*** NOTE: The following entries are all that need to be made
when completing this form for the purpose of track-
ing equipment purchases related to Superfund
activities.

1. NAME: John Doe
2. DATE: 85/03/15
6. SUPERFUND: YES

9. PRIMARY OSHA OFFICE:
a. REGION NUMBER: 10
b. AREA OR DISTRICT OFFICE NAME: Boise Area Office
16. TYPE OF ACTIVITY: Equipment Purchase
20. a. COST CENTER: 037
c. NON-EXPENDABLE EQUIPMENT: \$16,000.00
21. ABSTRACT: HNu meter \$ 5,000
Miran 1-B \$11,000

EXAMPLE OF HOW TO FILL OUT THE HAZARDOUS WASTE
ACTIVITY FORM FOR REQUESTED TECHNICAL ASSISTANCE

*** NOTE: The following entries are all that need to be made
when completing this form for the purpose of track-
ing technical assistance related activities.

1. NAME: Jane Doe
2. DATE: 83/11/21
3. SITE NAME AND ADDRESS: Hooker (Hyde Park)
Niagara Falls, NY
6. SUPERFUND: YES
9. PRIMARY OSHA OFFICE:
a. REGION NUMBER: 2
b. AREA OR DISTRICT OFFICE NAME: N/A
14. PERIOD OF ACTIVITY COVERED BY THIS FORM: 83/11/14 -
83/11/17
16. TYPE OF ACTIVITY: Technical Assistance Visit
18. a. TYPE OF RESPONSE: Health & Safety
b. N/A
c. Technical Assistance
d. EPA-Requested

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20.
 - a. COST CENTER: 037
 - b. PRESITE: 40 hours
ONSITE: 32 hours
POSTSITE: 40 hours
 - c. TRAVEL: \$1083.00
21. ABSTRACT: Include a brief description of the activity performed, example -- participated in a comprehensive review of the site safety and health plan. This included an onsite visit and three 2-day meetings.

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21. Abstract (Include a brief description for appropriate categories)

1) Site description including grounds, contaminants, and containers 2) Activities performed by OSHA 3) PPE and equipment utilized by employees and by OSHA 4) Results 5) Other

22. References

a. OSHA Inspection Number Reporting I.D. Number

b. Site Safety Plan ☐ Yes ☐ No Location Preparer

c. Other Documents (Including Title, Source, and Location)

For File Manager Use Only

Record I.D. Record Type Status

Input Date Related Record I.D. Numbers

Technical Review Date Reviewer

Editorial Review Date Reviewer

Review Comments

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