

To: Central Safety Committee Members

From: B. L. Trego
Date: December 14, 1989

Interoffice
Communication

Subject: HAZWOPER - WHAT'S THAT?

VISTA

OSHA's new Hazardous Waste Operations Emergency Response (HAZWOPER), 1910.120, addresses the safety of workers dealing with hazardous waste. However, it is not just a hazardous waste worker standard. It not only protects fire fighters, police officers and ambulance and hazardous team members who respond to hazmat spills, it also protects workers at cleanup operations at waste dump sites, and waste treatment storage and disposal facilities approved by the EPA.

In our case, compliance with the final rule's requirements will be mostly a matter of fine tuning our existing programs and procedures. We need to get some procedures and training documented but all in all we are not in too bad of shape.

The following is a summary of the general requirements of the 1910.120 final rule which will pertain to plants such as ours:

- A safety and health program designed to identify, evaluate, and control safety and health hazards and provide for emergency response.
- Training of employees before they engage in hazardous waste operations or emergency response that could expose them to safety and health hazards.

The training requirements are as follows:

- o New employees need twenty-four hours initial training by an instructor and an annual refresher of eight hours by the employer.
- o Current employees need twenty-four hours initial training or previous work experience and/or training certified as equivalent by the employer and an eight-hour refresher annually.

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- o On-site emergency response workers must receive initial training necessary to protect themselves and others and be able to show competency annually. The employer must certify this.
- o Off-site emergency personnel require training specific to the level at which they respond.

Level 1 - First Responder - Awareness

First responder at this level is one who is likely to witness or discover a hazmat release. They must know:

- 1) What hazardous materials are and the risks associated with them.
- 2) Understand potential outcomes of a hazmat emergency.
- 3) Recognize hazardous materials and identify them.
- 4) Understand his role in the plan.
- 5) Realize need for more resources and notifications.

Requires training or proven experience in above competencies. Demonstration of competencies annually required.

Level 2 - First Responder - Operational

First responder at this level responds to a hazmat emergency for the purpose of protecting nearby persons, property, or the environment. They respond in a defensive fashion. Fire fighters fall into this category.

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Level 2 - continued

- 1) Knowledge of basic hazard and risk assessment techniques.
- 2) Knowledge of personal protective equipment available.
- 3) Understand basic hazmat terms.
- 4) Know how to control and contain hazmat within their capabilities.
- 5) Know how to decontaminate.
- 6) Understand SOP's and terminating procedures.

Level 3 - Hazardous Materials Technician

These are people who respond to releases for the purpose of stopping the release.

- 1) Twenty-four hours training equal to Level 2.
- 2) Capable of implementing the community Emergency Operations Plan.
- 3) Able to classify, identify and verify known and unknown materials using direct reading instruments.
- 4) Able to function within assigned role in the Incident Command System.
- 5) Able to select and use selected hazmat response personal protective equipment and clothing.

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Level 3 - continued

- 6) Understand hazard and risk assessment techniques.
- 7) Be able to perform advanced control/containment operations.
- 8) Understand and implement decontamination procedure.
- 9) Understand basic chemical and toxicological terminology and behavior.

Level 4 - Hazardous Materials Specialist

These people respond with and support hazmat technicians. The duties are basically the same but they are generally more knowledgeable (usually in a certain task area). They act as liaison with local, state and federal governments.

- 1) At least twenty-four hours training equal to Level 3.
- 2) Know community emergency plan.
- 3) Know state emergency response plan.
- 4) Able to develop a site safety and control plan.
- 5) Understand basic chemical, radiological, and toxicological terminology and behavior.
- 6) All knowledge that the Level 3 responder would have.

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Level 5 - On-Scene Incident Command

Normally the ranking fire or police officer at the scene is the Incident Commander. They need at least Level 2 training and experience plus the following:

- 1) Know and be able to implement the community incident command system.
 - 2) Know how to implement the local Emergency Operation Plan.
 - 3) Understand the hazards of working with chemical protective clothing.
 - 4) Know the state emergency response plan and the federal emergency response team.
 - 5) Know and understand the importance of decontamination procedures.
- Medical surveillance offered at least annually and at end of employment for exposed employees and respirator wearers.
 - Engineering controls, work practices, and personal protective equipment, or a combination of these must be implemented to reduce exposures below established exposure levels.
 - Air monitoring with periodic monitors to assure proper PPE is being used.
 - Decontamination procedure.
 - Emergency response plan for on-site emergencies to address:
 - 1) Personnel roles
 - 2) Lines of authority
 - 3) Training

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- 4) Communications
- 5) Emergency recognition and prevention
- 6) Evacuation routes and procedures
- 7) Emergency medical treatment
- 8) Emergency alarm system

- Off-site emergency response plan.

What Does This Mean to Us at Aberdeen?

- 1) We have an acceptable safety and health program at this time.
- 2) Our initial training is adequate with twenty hours the first week plus respirator and fire training. RCRA and first aid training count, also. Our documentation at this time is adequate, also. It will have to be determined if earlier training documentation is sufficient.

Since only eight hours of annual training is required, we fulfill that easily. We need to document very well to ensure compliance.

Off-site responder training is taken care of by the requirement for tank car safety training for all CTIRP personnel. Dean Honeycutt, Charles Worlow, Jim Edwards, and myself have been trained and will arrange for annual training to maintain our competence level. I feel that we are hazardous material specialists or Level 4.

- 3) Our current medical surveillance program is adequate at this time. Some improvements can and will be made in the future.
- 4) We always attempt to maintain levels of exposure below established levels.
- 5) We take HNU instruments with us whenever we respond and are all proficient in its use.
- 6) We need to establish and practice a decontamination procedure; primarily for PA, lead and oils.

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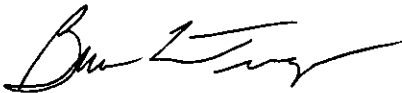
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- 7) Our existing Emergency Response Plan needs work but basically has the areas required by OSHA. A close review will be done this year.
- 8) An off-site emergency plan will need to be developed for Aberdeen area emergencies.

As you can see, we are not in too bad of shape but some effort will be required to get us into full compliance. Throughout the next few months, we will be working on the areas we are weak in.

If you have any questions or desire more information, please give me a call at extension 3618.



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Safety Director

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