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FROM: T. G. Grumbles

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Interoffice
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SUBJ: HAZWOPER MEETING ACTION ITEMS/COMMENTS

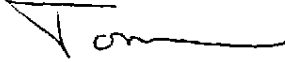
VISTA

Based on the results of Dave Cohen's presentation and lengthy discussion of the standard it is now clear that all plants are impacted to some degree by the standard's training and written program requirements. Action items and comments are listed below.

1. The core training program outline developed that day is attached. All plants will review this to determine where "equivalency" of training requirements can be demonstrated.

Equivalency will include subject matter and "solid" documentation of the training. A simple sign-up sheet probably wouldn't pass compliance standards.

2. The results of this review will be used to develop an action plan for meeting the training requirements.
3. Concurrent with the training review, all plants will review their emergency and contingency plans to determine what revision/additions are needed to meet the standard's requirements.
4. Dave Cohen will facilitate the review of any labor implications of the requirement, to demonstrate comprehension in the training.
5. Tom Grumbles and Dave Cohen will obtain clarification on the following issues:
 - a) Definition of immediate release area;
 - b) Applicability of requirements if "Category III" employees respond to emergencies at a "Category I" facility.
 - c) Definition of "in-depth hazard and risk techniques" (found on Page 9329).
 - d) OSHA's position on competency requirements for training and for trainers.


T. G. Grumbles

dlj
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HAZWOPER TRAINING
CORE REQUIREMENTS

A. General Safety Rules

1. Plant safety policy
2. Personal protective equipment required in plant
3. Code of Conduct
4. Proper work attire
5. Housekeeping
6. ESAR Procedure
7. Safety showers

B. Basic Chemical Awareness

1. Hazard communication - standard - hazards - MSDS
2. Material safety data sheets
3. Toxic substances control act
4. Signs and labels
5. New chemical purchases

C. Vehicle and Pedestrian Safety

1. Pedestrian and general travel through plant

D. Emergency Basics

1. Gas release/alert procedures
2. Alarms and warnings
3. Reporting emergencies
4. Hazardous weather procedures
5. Evacuation and safe places of refuge

E. Safety Department and Safety Services

1. Safety Department staff and services provided
2. First aid area
3. Accident reporting procedures
4. Medical surveillance and physical examinations
5. Access to employee records

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A. Physical Hazard Awareness

1. Safe work practices
2. Slip, trip, and fall hazards
3. Burn hazards and heat stress
4. Plant color codes
5. Utility hose standard

B. Chemical Awareness

1. Benzene
2. Ethylene oxide
3. Asbestos
4. Radiation
5. Methyl chloride
6. Alkyls
7. Flammable and combustible liquids
8. Flammable gases
9. Compressed gases
10. Acids
11. Bases
12. Waste clean up control measures
13. Lead
14. Chlorine
15. VCM
16. EDC
17. Vinylidene chloride
18. Carbon Tet.
19. HF
20. Nitrogen

C. Emergency Control Plan

1. Emergency Control Procedure
2. Spill and leak procedures & terminations
3. Protective clothing
4. Decontamination procedures
5. Transportation emergencies given to "a select few"

D. Respiratory Protection

1. Respiratory protection
2. Training in specific respirators
3. Respiratory fit testing

E. Hearing Conservation

1. Hearing conservation training
2. Information of hearing protectors available

F. Fire Protection

1. Anatomy of a fire and fire classifications
2. Hazards of incipient stage fires
3. Plant fire fighting and personal protective equipment
4. Proper use of a fire extinguisher
5. Hand-on fire extinguisher training
6. Assisting the fire brigade

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- G. Plant Safety and Health Procedures
(Cover each procedure individually)
- H. Back Wellness Program
- I. Field Sampling Devices and Equipment (Comb. Gas Meters, Draeger
Tubes, etc.)
- J. Emissions Data
- K. RCRA
- L. Mutual Aid/CAER
- M. Emergency Notifications
- N. Information Availability
- O. Potential Release Sources
- P. Incident Risk Assessment
- Q. HAZMAT Terminology

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