

## What You Need to Know about the HAZWOPER Standard

Following the Hazardous Waste Operations and Emergency Response (HAZWOPER) requirements and regulations not only protects the health and safety of your employees, but it also saves you from expensive litigation you could face if you accidentally expose the outside environment and nearby residents to the potentially hazardous toxins on the worksite.

Officials from the Occupational Safety and Health Administration (OSHA), the U.S. Environmental Protection Agency (EPA) and the National Institute for Occupational Safety and Health (NIOSH) all have input on HAZWOPER's regulations because of the widespread effect hazardous waste has on the population as a whole, not just the industries' workforces. This document will help you understand the basic requirements of HAZWOPER and determine whether you are in compliance. For a complete list of HAZWOPER requirements or to read the standard in its entirety, visit [www.OSHA.gov](http://www.OSHA.gov) and search HAZWOPER (Standard 29 CFR 1910.120).

### Who Needs to Comply?

HAZWOPER applies to the following types of operations, unless the employer can demonstrate that the operation does not involve the reasonable possibility of employee exposure to safety or health hazards:

- Cleanup operations required by a government body (federal, state or local) involving hazardous substances conducted at uncontrolled hazardous waste sites
- Corrective actions involving cleanup operations at sites covered by the Resource Conservation and Recovery Act (RCRA)
- Voluntary cleanup operations at sites recognized by government bodies (federal, state or local) as uncontrolled hazardous waste sites
- Operations involving hazardous waste conducted at treatment, storage or disposal facilities

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What qualifies as an emergency under HAZWOPER can vary, and you should consider the nature of your operation and the extent of your employees' training. For example, small acid spills by a firm that routinely handles acids would not be an emergency; however, the same situation might be considered an immediate hazard on a site where employees have less training, equipment or experience. In the event that employees are in the following situations, the HAZWOPER standard would apply:

- Presence of high concentrations of toxic substances

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- Any situation involving hazardous substances that is life- or injury-threatening
  - Environments that present imminent danger to life and health (IDLH situations)
  - Accidents that present an oxygen-deficient atmosphere
  - Conditions that pose a fire or explosion hazard
  - Any situation that requires the evacuation of an area or that requires immediate attention because of the danger posed to employees in that area
- The ability to recognize the presence of hazardous substances
  - The ability to identify the hazardous substances, if possible
  - The ability to realize the need for additional resources and make appropriate notifications
2. First Responder Operations Level — individuals who respond to releases of hazardous substances for the purpose of protecting nearby people, property or environment from damage. They should respond defensively by containing the release and keeping it from spreading. Must have eight hours of training or sufficient experience to demonstrate:

## HAZWOPER Training

This standard provides specific safety regulations, emergency procedures and training guidelines for employers to follow at worksites that handle hazardous waste or who have the potential for accidental release of dangerous chemical substances. HAZWOPER's main goal is to get employers to think about how they would handle a spill before it occurs.

HAZWOPER sets five basic training levels related to chemical emergency response, and training requirements for these five groups vary depending on how closely they work with the hazardous material spill. All training must be completed upon hiring for any employee that is expected to participate in emergency response.

1. First Responder Awareness Level — individuals likely to witness a hazardous substance release and whose only responsibility would be notifying the proper authorities. Must have sufficient training to demonstrate:
  - Understanding of what hazardous substances are and the risks associated with them in an incident
  - Understanding of the potential outcomes associated with a hazardous substance emergency
2. First Responder Operations Level — individuals who respond to releases of hazardous substances for the purpose of protecting nearby people, property or environment from damage. They should respond defensively by containing the release and keeping it from spreading. Must have eight hours of training or sufficient experience to demonstrate:
  - Knowledge of hazard and risk assessment
  - Knowledge of proper personal protective equipment (PPE) use
  - Knowledge of basic control, containment and/or confinement operations
  - Understanding of standard operating procedures
3. Hazardous Materials Technician — individuals who respond to releases with the purpose of actively and aggressively stopping it. They will attempt to plug, patch or otherwise stop the hazardous substance release. Must have at least 24 hours training, all the first responder operations knowledge and:
  - Knowledge of how to implement the employer's emergency response plan
  - Ability to classify, identify and verify known and unknown materials by using survey equipment
  - Knowledge of how to select and use specialized chemical PPE
  - Have the ability to perform advanced control,

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containment and/or confinement operations with the resources and PPE available

- Knowledge of basic chemical and toxicological terminology and behavior

4. Hazardous Materials Specialist — individuals who respond with and provide support to hazardous material technicians, but with more specific knowledge of various hazardous substances. Also acts as the site liaison with government authorities. Must have 24 hours of training, all technician-level knowledge and employer-certified knowledge on:

- The local, state and federal emergency response plan
- Classification, identification and verification of known and unknown materials using advanced survey equipment
- The implementation of decontamination procedures
- Advanced chemical, radiological and toxicological terminology and behavior

5. On-Scene Incident Commander — individuals who assume control of the incident site. Must have 24 hours of training and employer-certified competency in the following areas:

- Ability to implement the employer's incident command system
- Ability to implement the employer's emergency response plan and the local/state/federal emergency response plan
- Understanding of the hazards and risks associated with employees working in chemical protective clothing
- Understanding of the importance of decontamination procedures

Some important notes on training regulations in the HAZWOPER standard are that measurements of a qualified trainer can be met by academic degrees, completed training courses and/or work experience. Also, HAZWOPER specifically addresses the use of video or online training to satisfy requirements, saying that computer-based systems are an incomplete solution and must be supplemented.

## HAZWOPER Emergency Response Plan

Another important section of the HAZWOPER section you should take note of is the need for an emergency response plan with regard to hazardous substance releases. HAZWOPER gives the following guidelines for employers' emergency response plans, saying it should at least include the following:

- Pre-emergency planning
- Personnel roles, lines of authority, training and communication standards
- Emergency recognition and prevention
- List of safe distances and places of refuge
- Site security and control standards
- Evacuation routes and procedures
- Decontamination procedures
- Emergency medical treatment and first aid procedures
- Emergency alerting and response procedures
- Critiques and follow-ups on previous emergency response situations

For more information on how you can further implement HAZWOPER loss control methods, contact Marshall & Sterling, Inc..