

Hanford Standardized HAZWOPER Training Program Description

Prepared for the U.S. Department of Energy
Assistant Secretary for Environmental Management



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1.0 PURPOSE

This document establishes the standardized training requirements for the **Hazardous Waste Operations and Emergency Response (HAZWOPER)** Training Program based upon the OSHA training requirements contained in 29 CFR 1910.120(e) and (p) for Hanford Prime Contractors and their subcontractors.

2.0 SCOPE

The Standardized HAZWOPER Training Program provides the principles and methodologies used to identify hazards and conduct work at Hanford hazardous waste sites as defined by 29 CFR 1910.120. The standardized HAZWOPER training provided by HAMMER allows for the transfer and qualification of workers allowing movement between contractors and the projects.

Based on the principles of ISMS and VPP, the HAZWOPER Training Program Description establishes the HAZWOPER training requirements for all Hanford contractors, DOE offices, subcontractors, vendors and visitors. The TPD identifies the requirements of applicable standards, orders, and regulations, including:

- 29 CFR 1910.120
- 29 CFR 1926.65
- 10 CFR 851
- DOE P 450.4 *Safety Management System Policy*

Non-regulatory requirements, such as DOE Handbook (Chapter 4) and National Institute of Environmental Health Science (NIEHS) Minimum Criteria, are also included as applicable to the training program.

This training program description applies to all Hanford contractors and subcontractor employees, and vendors who are:

- Identified by 29 CFR 1910.120(e)(1)(i) and 1910.120(p)(7) and (8) (iii) as requiring HAZWOPER training.
- Identified by their management to attend.

3.0 RESPONSIBILITIES

3.1 The Director, HAMMER Training is responsible to:

- Implement and administer the Hanford Standardized HAZWOPER Training program.

3.2 Contractor HAZWOPER Technical Authorities are responsible to:

- Evaluate the HAZWOPER Initial and Refresher Training Programs and verify all requirements are met.
- Act as HAZWOPER training course material Subject Matter Expert (SME), typically as a part of the Advisory Group.
- Participate in the HAZWOPER Site Standardization Committee (HSSC) as requested.

3.3 Manager, Conduct of Training

- Assign a Hanford Mission Integration Solutions (HMIS) HAZWOPER Training Point of Contact (POC).
- Approve training equivalencies for HMIS HAZWOPER workers.

3.4 HMIS HAZWOPER Training POC is responsible to:

- Recommend training equivalency approvals to the Conduct of Training Manager for HAZWOPER workers based on a review of the trainee's previous training and /or experience.
- Provide training assessment or training evaluations of the HAZWOPER Initial and Refresher Training Courses.
- Request Subject Matter Experts (SME) to perform technical reviews of HAZWOPER training course materials.
- Evaluate the HAZWOPER Training Program courses.
- Assist contractors in evaluating equivalencies.
- Maintain documentation of objective verification for equivalencies.

3.5 Contractor Training Managers are responsible to:

- Approve training equivalencies for contractor HAZWOPER workers.
- Maintain documentation of objective verification for equivalencies.
- Participate in the HAZWOPER Site Standardization Committee and HAZWOPER Working Group providing Project/Facility specific information and lessons learned to the NIEHS Grantees.
- Assess and/or evaluate HAZWOPER training programs
- Review worker trainer resource estimates and solicit support as needed
- Flow down HAZWOPER training requirements through the procurement process

3.6 Contractor Managers are responsible to:

- Determine the appropriate training needed for each of their employees, utilizing training information systems, facility-specific documents (such as facility Health and Safety Plans), health/safety exposure information, and monitoring data available from facility health and safety representatives.
- Ensure their employees attend required training prior to the potential for exposure to hazards.
- Support the standardized HAZWOPER Worker Trainer Program by providing contractor input and participate in the Worker Trainer Enhancement Workshops.
- Coordinate with procurement to ensure appropriate training requirements have been identified in accordance with the TPD

3.7 HAZWOPER Site Standardization Committee

The HAZWOPER Site Standardization Committee (HSSC) is a working group derived from the Training Center of Expertise (TCOE). The HSSC shall be responsible for:

- Maintaining the HAZWOPER Training Program Description
- Periodic review of the HAZWOPER training courses through coordination with the Conduct of Training Manager
- Establishing elements of the requirements of ISMS and intent of VPP
- Periodic review and trend site accepted equivalencies for consistency

The HSSC shall consist of the following membership:

- Contractor technical/interpretative authorities (as requested)
- Contractor Training Managers
- HAMTC Training Director
- Building Trades Training Director
- HAMMER Conduct of Training Manager

The HSSC shall refer to HMIS-PLN-SP-41080, *Hanford Site Wide Safety Standards Management Plan*, for technical issues relating to the committee's working processes. For training and funding issues, the HSSC shall refer to the TCOE and/or the HAMMER/Hanford Training Board of Directors.

3.8 HAZWOPER Working Group

The intent of the HAZWOPER Working Group is to provide a mechanism for Hanford health and safety stakeholder partners to provide feedback and information and work in a collaborative fashion to ensure HAZWOPER training programs are effective and meet the needs of the Hanford workforce. This Working Group accomplishes elements of the requirements of ISMS and intent of VPP.

The Working Group may consist of the following participants or their delegates:

- NIEHS Grantee Leads
- Contractor Training Managers
- HAMTC Training Director
- Building Trades Training Director
- HAMMER Conduct of Training Manager
- Contractor Technical/Interpretative Authorities (as requested)
- Others as requested

Roles and Responsibilities

- Meets quarterly, at a minimum
- Receives and reviews feedback from the HSSC regarding contractor needs and course content
- Collaborate to make recommendations relating to HAZWOPER Training

- Provide examples of work and lessons learned for incorporation into training courses to maintain currency with Hanford work scope
- Collaborate on other topics as requested

4.0 INITIAL HAZWOPER TRAINING REQUIREMENTS

HAZWOPER training is driven by the employee's exposure or potential exposure to hazardous substances, health hazards or safety hazards, and is not dependent on the employee's job title or whether or not he/she is escorted.

HAMTC and CWB&CTC (Building Trades) workers new to Hanford whose job assignment requires HAZWOPER training shall be trained to the 40-Hour HAZWOPER level regardless of waste site designation.

The HAZWOPER initial training is comprised of the following courses that meet the specified 29 CFR 1910.120 section training requirements.

Course Title	Course No.	Section training requirements:
40-Hour Initial HAZWOPER	031220	(e)(3)(i)
24-Hour Initial TSD HAZWOPER	031110	(p)(7)(i) and (p)(8)(iii)(B)
24-Hour Initial Site Worker HAZWOPER	031210	(e)(3)(ii) or (e)(3)(iii)
Bridge from 24 to 40-Hour HAZWOPER	031230	(e)(3)(iv)
8-Hour Manager/Supervisor HAZWOPER	031310	(e)(4)
One Day Supervised Field Experience	Project Specific	(e)(3)(ii)
Three Day Supervised Field Experience	Project Specific	(e)(3)(i)

For equivalency information see Section 6.2, *Extensions and Equivalencies*.

4.1 Training Program Entry Requirements

There are no educational or experience entry requirements for HAZWOPER Training. Comprehension of the English language is a requirement to attend the HAZWOPER training. The 40-Hour Initial HAZWOPER requires that workers shall

have a respirator user medical evaluation due to respiratory equipment worn during the class.

4.2 Field Experience

Mandatory “field experience” is required following initial HAZWOPER training. The 40-Hour Initial HAZWOPER course #031220 requires completion of a 3-day supervised field experience training documented on Site Form A-6001-939 (or equivalent). The 24-Hour Initial Site Worker HAZWOPER course #031210 requires completion of a 1-day supervised field experience training documented on Site Form A-6001-940 (or equivalent).

4.3 Training Requirements and Documentation

29 CFR 1910; 07-01-99, Section 120(e)(6) “Training certification. Employees and supervisors that have received and successfully completed the training and field experience specified by OSHA 1910.120 paragraphs (e)(1) through (e)(4) shall be certified by their instructor or the head instructor and trained supervisor as having successfully completed the necessary training. Employees who have received the required initial training shall be given a written certificate attesting that they have successfully completed the necessary training. Any person who has not been so certified shall be prohibited from engaging in hazardous waste operations.” Official training documentation is available through Management Information Systems (Training Records).

29 CFR 1910; 07-01-99, Section 120(q)(6) “Emergency Response Training. Training shall be based on the duties and function to be performed by each responder of an emergency response organization. The skill and knowledge levels required for all new responders shall be conveyed to them through training before they are permitted to take part in actual emergency operations on an incident. Employees who participate, or are expected to participate, in emergency response, shall be given appropriate training.”

5.0 INITIAL TRAINING PROCESSES

5.1 Instructional Methods

Four international unions under the National Institute for Environmental Health Safety (NIEHS) grantees provide instructors for the OSHA mandated topics for the 24/40-hour Initial HAZWOPER. Each HAZWOPER training provider trains to the same DOE objectives but may vary their instructional methodologies. Instructional methodologies can include hands-on demonstrations, small group problem solving activities, traditional lecture, brainstorming, games, workplace simulations, hands-on practice with respirators, and other similar methodologies. Hands-on craft-specific training is emphasized during each initial course.

The instructional methodologies of the Bridge Course are the same as in the 40-Hour HAZWOPER course.

The 8-Hour Manager/Supervisor HAZWOPER course consists of 8-hours of classroom instruction. The primary instructional methodologies used are lecture and discussion.

5.2 Testing

Completion of the 24-Hour Initial HAZWOPER, 40-Hour Initial HAZWOPER, and Bridge to the 40-Hour Initial HAZWOPER courses require successful completion of a written examination and successful participation in the practical exercises. The practical is an evaluation of the participant performing a dress-out in different levels of personal protective clothing. The passing criterion for the practical portion is performance to the satisfaction of the instructor.

Proficiency for HAZWOPER Refresher training shall be assessed by completion of a written examination and, if appropriate, a skills assessment.

5.3 Failures and Remediation

Failure of a written exam shall follow the Hanford/HAMMER Exam Policy.

5.4 Instructor Qualifications

Instructors / Worker Trainers shall be qualified per the Hanford/HAMMER Instructional Qualification Training Program Description to present 29 CFR 1910.120(e)(5), (p)(7), and (q)(7)(iii) subject matter by satisfactorily completing a training program for the subjects they are expected to instruct or by having the academic credentials and experience necessary for providing instruction for the subjects.

5.5 Facility Training Guidance

Facilities may have additional training requirements to supplement the HAZWOPER Training program. Typically, this training provides additional the knowledge and skills needed by the employee to work safely in the wide variety of job tasks required within a RCRA/CERCLA HAZWOPER regulated area.

6.0 REFRESHER TRAINING

6.1 Annual HAZWOPER Refresher Training

HAZWOPER Initial training must be completed before receiving credit for completion of HAZWOPER Refresher Training. The 8-Hour HAZWOPER Refresher training course #032020 meets the refresher training requirements of 29 CFR 1910.120(e)(8).

Contractors that have employees that are working to established procedures at TSD sites will identify the assigned duties and functions necessary to perform their operations. These assigned duties and functions shall be included in the TSD specific training. Total refresher training time shall be at least eight hours or sufficient for effective review of assigned duties and functions. The HSSC will be provided the details of assigned duties and functions for incorporation into specific training courses in accordance with 29 CFR 1910.120 (p).

6.2 Extensions and Equivalencies

Employees required to perform work operations specified as requiring training under 1910.120 (e) and (p) are required to have completed the appropriate HAZWOPER training within the past 12 months. No employee who is expired on their re-training date shall perform HAZWOPER covered-work operations.

Employees required to enter a RCRA/CERCLA HAZWOPER regulated area are required to have appropriate HAZWOPER training within the past 12 months. No employee who is past the training expiration date shall enter a HAZWOPER regulated area.

Employees who want to regain HAZWOPER qualification may attend a HAZWOPER Refresher class if they have had either initial or refresher training within the past 36 months. Some providers of HAZWOPER training may require less than the 36 months post training to attend their HAZWOPER Refresher classes.

The Equivalency process is for the purpose of crediting individuals for equivalent classroom training previously completed. Contractor Training Management will authorize equivalencies in accordance with their approved contractor equivalency program and in accordance with the required training objectives from 29 CFR 1910.120. Equivalencies shall not be granted for 40 Hour HAZWOPER training courses that do not have an appropriate hands-on component. Individuals who are granted an equivalency are still required to perform the one day or three day supervised field experience.

The intent is to provide employees of Hanford Prime Contractors and their subcontractors access to the Hanford Standardized HAZWOPER Training Program. Periodic equivalency trending reviews by the HSSC will assist in meeting this intent.

6.3 Instructional Methods

Six international unions under the National Institute for Environmental Health Safety (NIEHS) grantees provide instructors for the OSHA mandated topics for the HAZWOPER annual refresher class. Each HAZWOPER training provider trains to the same DOE objectives but may vary their instructional methodologies. Instructional methodologies can include hands-on demonstrations, small group problem solving activities, traditional lecture, brainstorming, games, workplace

simulations, hands-on practice with respirators, knowledge/skills evaluations, and other similar methodologies

6.4 Examinations and Remedial Training

Completion of the 8-Hour HAZWOPER Refresher course requires successful completion of a written examination or a knowledge evaluation.

7.0 SOURCE REQUIREMENTS DOCUMENTS

29 CFR 1910, *Occupational Safety and Health Standards, Section 120(e), (p) and/or (q)*

29 CFR 1926.65. *Safety and Health Regulations for Construction*

10 CFR 851. *Worker Safety and Health Program*

DOE P 450.4 *Safety Management System Policy*

8.0 NON-REGULATORY REQUIREMENTS DOCUMENTS

The following documents delineate the non-regulatory requirements at Hanford for standardized HAZWOPER Training:

- DOE *Handbook for Occupational Health and Safety during Hazardous Waste Activities*, Chapter 4, Interim Draft, March 1995
- NIEHS, *Guidance for Hazardous Waste Operations and Emergency Response (HAZWOPER) HAZWOPER-Supporting and All-Hazards Disaster Prevention, Preparedness, & Response.*