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Emergency Responder Health and Safety Manual

Chapter 2

Health and Safety Training Program

DRAFT

Customized for Region 4 on April 13, 2020

U.S. Environmental Protection Agency

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LIST OF ACRONYMS

AED	automated external defibrillator
APRs	air-purifying respirators
CFR	Code of Federal Regulations
CPR	cardiopulmonary resuscitation
EPA	U.S. Environmental Protection Agency
FRM	Field Readiness Module
HASP	site-specific health and safety plan
HAZWOPER	Hazardous Waste Operations and Emergency Response
HSPC	Health and Safety Program Contact
OEM	Office of Emergency Management
OLEM	Office of Land and Emergency Management (formerly called Office of Solid Waste and Emergency Response (OSWER))
OSC	On-Scene Coordinator
OSHA	Occupational Safety and Health Administration (U.S. Department of Labor)
PAPRs	powered air-purifying respirators
PPE	personal protective equipment
SCBA	self-contained breathing apparatus
SHEM	safety, health and environmental management
SHEMP	Safety, Health and Environmental Management Program
SSD	Safety and Sustainability Division (formerly called Safety, Health and Environmental Management Division (SHEMD))

1.0 INTRODUCTION

The U.S. Environmental Protection Agency's (EPA's) Emergency Responders address sudden releases of oil and hazardous materials (including events involving the release of chemical, biological, radiological, and nuclear agents) and they perform physically demanding work under variable environmental conditions. Before allowing emergency responders to work in the field, EPA must ensure that they are aware of the potential hazards they might encounter and know how to minimize or eliminate the possibility of being harmed while performing their job duties. Toward that end, the agency's emergency responders must complete a variety of health and safety training requirements – put forth in EPA and Occupational Safety and Health Administration (OSHA) regulations and policies – to ensure their readiness. This chapter identifies those basic health and safety training requirements. Emergency responders who wish to become certified to serve in Incident Management Team key leadership positions (e.g., Safety Officers) will be required to take additional training, which is outlined in EPA Order 2073 – *EPA Incident Command System Training, Qualifications, and Certification Standards*.

1.1 Background Information and Regulatory Basis

A variety of laws, regulations, and internal agency policies give EPA the authority to administer a health and safety training program. Additionally, EPA Order 1440.2 (titled *Safety and Health Training for Agency Employees*) and SHEM Guideline 51 (titled *Safety, Health and Environmental Management Training*) present the agency's overall approach for administering its training program. Both documents also include specific requirements that apply to all Field Employees, including On-Scene Coordinators (OSCs), Special Team Members and other Emergency Responders, as do the following resources:

- *EPA's Emergency Responder Health and Safety Manual*. The manual's chapters provide information about training requirements that must be fulfilled to address programmatic requirements (e.g., medical surveillance, respiratory protection) or specific hazards (e.g., radiation, bloodborne pathogens).

- An OSC Readiness Task Force document, titled *Training Requirements and Professional Development Guidelines for U.S. EPA On-Scene Coordinators* (August 2011).

The following laws, regulations, and internal EPA policy orders establish the need for a training program:

- Occupational Safety and Health Act of 1970
- 29 Code of Federal Regulations (CFR) Part 1960, Basic Program Elements for Federal Employees
- 29 CFR 1910.120(b)(1)(ii)(d)
- Executive Order 12196, Occupational Safety and Health Programs for Federal Employees
- EPA Order 1440.1, Safety, Health and Environmental Management Program

This chapter, which serves as a written safety and health training program as required under 29 CFR 1910.120(b)(1)(ii)(d), summarizes emergency responder health and safety training requirements, identifies key players who must administer the training program, outlines recordkeeping procedures, and directs readers to citations and references that provide additional information on course content.

1.2 Instructions for Users

This chapter must be implemented across all EPA regions, Office of Land and Emergency Management (OLEM) special teams, and Headquarters. These organizations must adopt the requirements and management practices listed in this chapter and produce a customized version of the chapter that is reviewed/updated on an annual basis.

To customize the chapter, users must (1) complete Appendix A and (2) verify that the task assignments presented throughout the chapter (highlighted in yellow) are correct or modify them accordingly to reflect organization-specific practices. Additionally, if organizations advocate additional requirements, policies, or procedures, they must document them in Appendix B. See the Introduction chapter and the manual's website for more details on customizing and posting the chapter. The website also includes tools and resources that will be helpful to users, including downloadable forms, reference documents, and training materials.

2.0 ROLES AND RESPONSIBILITIES

Removal Managers; Safety, Health, and Environmental Management Program (SHEMP) Managers; immediate supervisors; and Health and Safety Program Contacts (HSPCs) assist in administering and enforcing the Agency's health and safety training program. Appendix A summarizes the tasks that these key personnel must perform. Organizations may delegate a task to someone other than the default assignment presented in the appendix if they wish to do so.

2.1 Identifying and Meeting Emergency Responder Training Needs

Immediate supervisors and SHEMP Managers (assisted by the HSPC) must collaborate to ensure that Emergency Responders have the knowledge and skills they need to perform their job duties safely. As a first step, they must determine which courses and hands-on exercises each Emergency Responder requires. To assist them, EPA has identified a core set of health and safety training requirements that all OSCs, Special Team Members, and other emergency responders must complete (see Table 1).

Individual OSCs and other Emergency Responders may also require additional health and safety training if they are assigned to work at sites where they could be exposed to an OSHA-regulated hazard listed in 29 CFR 1910 Subpart Z or some other hazard (e.g., operating a utility vehicle). For example, employees assigned to work at sites with asbestos-containing material (or presumed asbestos-containing material) will be required to take an asbestos-related course such as Asbestos Awareness or a more detailed course depending on the level of anticipated exposure. Similarly, employees reporting to a site with known carcinogens (e.g., acrylonitrile, benzene, OSHA's 13 carcinogens) may be required to take additional chemical-specific training as well. Immediate supervisors and SHEMP Managers must also assess each emergency responder's specific job tasks to determine if additional training that goes beyond the core requirements is required.

Removal Managers must provide the resources (including time and monetary support) that are needed for OSCs to complete the health and safety training requirements.

SHEMP Managers (assisted by HSPCs) must schedule and provide training, and immediate supervisors must ensure that their employees attend scheduled training sessions.

2.2 Recordkeeping – Documenting the Completion of Training Requirements

2.2.1 Training Documentation

Upon completing a course or exercise, emergency responders must obtain documentation (such as a certificate or some other form of documentation) showing that they successfully completed training. They must present a copy to their SHEMP Manager and/or the HSPC, who in turn will ensure that the training is documented in the agency's Emergency Management Portal's Field Readiness Module (FRM) (described in more detail below). Once the completed training has been entered into the FRM, the

SHEMP Manager and/or HSPC is not required to retain a hardcopy of the training documentation. Employees are advised, however, to retain a copy of all training-related documentation in their files.

2.2.2 Field Readiness Module

The FRM – an Internet-accessible database managed by the Office of Emergency Management (OEM) – provides a central repository for documenting the status of employee training requirements and other readiness elements (e.g., medical clearance status).

All regions and special teams must use the FRM to track the completion of health and safety requirements for emergency responders (including OSCs) as directed in memos from OEM and SSD. Employees have access to portions of the FRM, but restrictions have been established to prevent them from updating their own health and safety training requirements. To ensure data integrity, credit for these courses can only be entered by designated Data Managers – individuals who have been granted rights to enter data on behalf of their region or special team. SHEMP Managers have such rights, and they may ask OEM to assign rights to other people on their staff (e.g., HSPCs) to assist with the data entry and tracking process.

2.2.3 Tracking Emergency Responder Training Status

The SHEMP Manager (assisted by the HSPC or other designated Data Managers) must:

- Keep track of which emergency responders have met their health and safety training requirements.
- Contact employees who have not completed necessary training to inform them that they need to do so and alert them of the next available training session.
- Alert the immediate supervisor and Removal Manager (or another designated person) if an OSC has not met a training requirement.

The Office of Emergency Management (OEM) has developed an OSC Health and Safety Certificate (available through FRM) to assist with the tracking process. It is an optional tool that Data Managers can use to obtain a snapshot of which OSCs within their region or special team are up-to-date with their requirements.

2.3 Determining Eligibility for Field Assignments

If an OSC lacks a health and safety training requirement, the Removal Manager (or another designated person) may prevent the OSC from working in the field (or at a minimum restrict their job assignments) until he or she completes the necessary training.

3.0 HEALTH AND SAFETY TRAINING REQUIREMENTS

Section 3.1 summarizes core health and safety training requirements that all OSCs and Emergency Responders must complete. As noted in Section 3.2, Emergency Responders may also need to take additional health and safety training courses depending on their regional or special team affiliation and their specific job assignments.

3.1 Core Health and Safety Training Requirements for Emergency Responders

Table 1 identifies training (classes and exercises) that Emergency Responders must complete. Those who are not up-to-date with these requirements may be subject to job restrictions. The courses listed in Table 1 do not all have to be delivered as standalone classes. For example, many of them, particularly the refresher courses, may be covered during annual 8-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training.

Table 1
Mandatory Health and Safety Training for OSCs

	Course Name (As Listed in the Agency's FRM)	Recommended Frequency/Length	Basis for Requirement and References That Provide Information on Course Content	Additional Notes
General Health and Safety Courses	Field Safety and Health – General Awareness (24 Hour Initial) EPA Order 1440.2	Upon initial assignment of field duties. Includes 24 hours of classroom training and 3 days of supervised field work (completed within 6 months of the classroom training).	• EPA Order 1440.2 (see Section 8[c][1]) • SHEM Guideline 51 – Table 51-1 (see page 42) – Pages 16 and 17 identify 18 components that must be covered during the initial classroom training: ➢ Basic Toxicology ➢ Chemical Hazards and Reactions ➢ Decontamination Awareness (Personnel) ➢ Driver Safety – Field Activities ➢ EPA's Occupational Health and Safety Program – Field Activities Awareness ➢ Hazard Communication ➢ Hazardous Energy Sources and Mechanical Hazards Awareness ➢ Hazardous Materials Transportation Awareness ➢ Heat and Cold Stress Awareness ➢ Ladders ➢ Medical Emergencies in Field Activities Awareness ➢ Medical Surveillance Awareness ➢ Natural Hazards Awareness ➢ Occupational Noise Exposure ➢ Personal Protective Equipment ➢ Planning and Preparation for Field Activities ➢ Portable Fire Extinguishers ➢ Respiratory Protection Awareness	On July 19, 2009, the acting SSD director distributed a memorandum indicating that SHEMP Managers may determine if employees who have taken 40-hour HAZWOPER training have already satisfied all the elements listed in the Field Safety and Health – General Awareness (24 Hour Initial) training course. If so, SHEMP Managers may give employees credit for this training requirement. Training is available in EPAs Skillport eLearning System.
	Field Safety and Health – On-the-Job Training (3 days) EPA Order 1440.2			
	Field Safety and Health – Annual Refresher (8 Hours) EPA Order 1440.2	Annual 8-hour refresher.	• EPA Order 1440.2 (see Section 8[c][1]) • SHEM Guideline 51 – Table 51-1 (see page 41) – Page 18 identifies three components that must always be included in annual refresher training: • Driver Safety – Field Activities • Hazard Communication • Personal Protective Equipment	The SHEMP Manager may opt to satisfy this training requirement with 8-hour HAZWOPER refresher training (assuming that the HAZWOPER refresher addresses the mandatory topics listed in the previous column).

	Course Name (As Listed in the Agency's FRM)	Recommended Frequency/Length	Basis for Requirement and References That Provide Information on Course Content	Additional Notes
General Health and Safety Courses (continued)	HAZWOPER - (24-hour Initial Training for Occasional Site Worker) 29 CFR 1910.120(e)(3)(ii) HAZWOPER – (Three Days Field Experience for General Site Worker) 29 CFR 1910.120(e)(3)(i)	Upon initial assignment of duties. Includes 24 hours of initial training and 3 days of field work (including supervised performance of activities; not just observation).	• 29 CFR 1910.120(e)(3)(ii) • Memorandum titled *Update on Safety and Health Training Requirements* distributed by the SHEMD Director [Wesley Carpenter] on December 4, 2009 • EPA's Emergency Responder Health and Safety Manual (see Section 4.2 of the Site-Specific Health and Safety Plan (HASP) Development chapter) • SHEM Guideline 51 • Table 51-1 (see pages 60 and 62)	Required for employees who occasionally enter a HAZWOPER regulated site while supporting emergency response operations. Not required for employees who have taken the 40-hour Initial Training for General Site Worker HAZWOPER Training
	HAZWOPER – (40-hour Initial Training for General Site Worker) 29 CFR 1910.120(e)(3)(i) HAZWOPER – (Three Days Field Experience for General Site Worker) 29 CFR 1910.120(e)(3)(i)	Upon initial assignment of duties. Includes 40 hours of initial training and 3 days of field work (including supervised performance of activities; not just observation).	• 29 CFR 1910.120(e)(3)(i) • Memorandum titled *Update on Safety and Health Training Requirements* distributed by the SHEMD Director [Wesley Carpenter] on December 4, 2009 • EPA's Emergency Responder Health and Safety Manual (see Section 4.2 of the Site-Specific Health and Safety Plan (HASP) Development chapter) • SHEM Guideline 51 – Table 51-1 (see pages 60 and 62)	Required for OSCs, Special Team Members, RPMs and other employees who are regularly conducting operations at HAZWOPER regulated sites. Employees with "equivalent" experience and skills from previous work experience and/or training do not have to repeat the training, provided that it can be verified through documentation or certification (see 29 CFR 1910.120(e)(9)).
	HAZWOPER – (Eight-hour Refresher Training for Hazardous Waste Site Workers) 29 CFR 1910.120(e)(8)	Annual 8-hour refresher.	• 29 CFR 1910.120(e)(8) • EPA's Emergency Responder Health and Safety Manual (see Section 4.2 of the Site-Specific Health and Safety Plan (HASP) Development chapter) • SHEM Guideline 51 – Table 51-1 (see page 57)	The SHEMP Manager may opt to satisfy this training requirement with "Field Safety and Health – Annual Refresher" training (see previous page).
	HAZWOPER – (Eight-hour Training for On-site Management and Supervisors) 29 CFR 1910.120(e)(4)	Initial training upon assuming supervisory duties.	• 29 CFR 1910.120(e)(4) • EPA's Emergency Responder Health and Safety Manual (see Section 4.2 of the Site-Specific Health and Safety Plan Development chapter) • SHEM Guideline 51 – Table 51-1 (see page 58)	–

	Course Name (As Listed in the Agency's FRM)	Recommended Frequency/Length	Basis for Requirement and References That Provide Information on Course Content	Additional Notes
			• OSC Readiness Task Force Document (dated August 2011)	
	Cardiopulmonary Resuscitation (CPR) Certification 29 CFR 1910.151 CFR 1926.21(b)(4)	Four hours of initial training for CPR, four hours of initial training for first aid, and one hour for AED (see Table 51-1 of SHEM Guideline 51) plus refreshers as recommended by the American Red Cross.	• 29 CFR 1910.151 and 29 CFR 1926.21(b)(4) • OSC Readiness Task Force Document (dated August 2011) • Tier 1 Group document (see Andy Smith's November 2009 memo [available on the Tier 1 Group Forum]) • SHEM Guideline 51 – Table 51-1 (see page 30 for CPR, page 44 for first aid, and page 26 for AED)	First aid and CPR training are frequently combined with a short session on AED training.
	First Aid Certification 29 CFR 1910.151 CFR 1926.21(b)(4)			
	Automated External Defibrillators (AED) Certification			
General Health and Safety Courses	Hazard Communication 29 CFR 1910.1200 29 CFR 1926.59	1 to 2 hours of initial training upon assignment to field duties and 1-hour annual refreshers thereafter (see Table 51-1 of SHEM Guideline 51).	• 29 CFR 1910.1200(h) • SHEM Guideline 51 – Page 17 identifies hazard communication as one of 18 topics that must be covered in initial 24-hour general field safety awareness training. – Page 18 identifies hazard communication as one of three topics that must be covered during annual field safety refreshers. – Table 51-1 (see pages 46 and 47)	Hazard communication does not have to be delivered as a standalone course. For example, it can be covered during an employee's 24-hour general field safety awareness training and annual 8-hour refresher training.
	Hazard Communication – Refresher 29 CFR 1910.1200 29 CFR 1926.59			
Medical Surveillance	Medical Surveillance Awareness EPA Order 1460.1	1 hour of initial training required upon entry into the medical surveillance program. Regular refreshers are not required, although additional training should be provided if the medical surveillance program undergoes significant changes.	• SHEM Guideline 57 (see page 28) • EPA's Emergency Responder Health and Safety Manual (see Section 5.1 of the Medical Surveillance Program chapter) • SHEM Guideline 51 – Table 51-1 (see page 72)	If changes are implemented to the medical surveillance program after an employee has taken awareness training, the changes may be communicated to them during annual 8-hour HAZWOPER refresher training.

	Course Name (As Listed in the Agency's FRM)	Recommended Frequency/Length	Basis for Requirement and References That Provide Information on Course Content	Additional Notes
	Nerve Agent Antidote Kits – User Training OSWER Directive 9200.51	2 hours of initial training upon receiving a kit and annual refreshers thereafter.	• Directive OSWER-9200.51 (training requirements are included as an attachment) • EPA's Emergency Responder Health and Safety Manual (see Section 5.2 of the Medical Surveillance Program chapter) • SHEM Guideline 51 – Table 51-1 (see page 74)	Refresher training on nerve agent antidote kits can be covered during annual 8-hour HAZWOPER refresher training. Emergency Responders are exempt from initial and refresher nerve agent kit training requirements if they work for a region or special team that chooses not to distribute these kits. Training is available in EPAs Skillport eLearning System.
	Nerve Agent Antidote Kits – User Training Annual Refresher OSWER Directive 9200.51			
Personal Protective Equipment (PPE) and Respiratory Protection Training and Exercises	Personal Protective Equipment 29 CFR 1910.132 29 CFR 1926 Subpart E	Initial training (prior to donning PPE) and annual refreshers. SHEM Guideline 51 indicates that 45 minutes to 1 hour of training is needed.	• 29 CFR 1910.132(f) • EPA's Emergency Responder Health and Safety Manual (see Section 3.2 of the Personal Protective Equipment Program chapter) • SHEM Guideline 51 – Page 17 identifies PPE as one of 18 topics that must be covered in initial 24-hour general field safety awareness training. – Page 18 identifies PPE as one of three topics that must be covered in annual field safety refresher training. – Table 51-1 (see page 75)	PPE does not have to be delivered as a standalone course. For example, it can be covered during initial 40-hour HAZWOPER training and annual 8-hour HAZWOPER refreshers.
	Personal Protective Equipment Annual Refresher 29 CFR 1910.132 29 CFR 1926 Subpart E			
	Respiratory Protection – User Training CFR 1910.134 29 CFR 1926.103 EPA Order 1440.3	Initial training required before using a respirator and annual refreshers thereafter. 1-4 hours depended on the experience and proficiency of the Emergency Responder.	• EPA Order 1440.3 • 29 CFR 1910.134(k) • EPA's Emergency Responder Health and Safety Manual (see Section 3.7.1 and 3.7.2 of the Respiratory Protection Program chapter) • SHEM Guideline 51 – Table 51-1 (see page 83)	Respiratory protection does not have to be provided as a standalone training. For example, initial training may be fulfilled during 40-hour HAZWOPER training. Also, respirator refresher training can be credited towards an employee's annual 8-hour HAZWOPER refresher requirement.
	Respiratory Protection – Annual Refresher 29 CFR 1910.134 EPA Order 1440.3			

	Course Name (As Listed in the Agency's FRM)	Recommended Frequency/Length	Basis for Requirement and References That Provide Information on Course Content	Additional Notes
	Practical Respirator Demonstration	Performed on an annual basis.	EPA's Emergency Responder Health and Safety Manual. (Section 3.7.2 of the Respiratory Protection Program chapter says "At least once a year, each emergency responder must participate in an exercise on the use of a negative-pressure APR and a PAPR by conducting an inspection, tear-down, cleaning, reassembly, and donning/doffing the respirator. In addition, on at least an annual basis, each emergency responder who uses a SCBA must practice using the equipment by conducting an inspection, donning/doffing, breathing down a tank of air (20 minutes minimum), cleaning, and reassembling the SCBA.")	The SCBA practice sessions may be held in conjunction with Level A exercises.
Illness, Injury, and Exposure	Illness, Injury and Near Miss Reporting	Initial training required upon employment; biennial refresher recommended.	• SHEM Guideline 51 (see Table 51-1 – page 64) • EPA's Emergency Responder Health and Safety Manual (Section 8.0 of the Injury, Illness, and Exposure Reporting chapter includes a table that lists topics that should be covered for different positions, including emergency responders (e.g., OSCs), supervisors, and onsite Safety Officers.	SHEM Guideline 51 requires all EPA employees to take at least 10 to 30 minutes of training on this topic. More in-depth training may be required for OSCs.
Physical Stress Management	Physical Hazards Awareness	1 hour of initial training upon assignment to field duties (see Table 51-1 of SHEM Guideline 51) and as needed thereafter.	• SHEM Guideline 51 – Table 51-1 (see page 77) • EPA's Emergency Responder Health and Safety Manual (Section 3.0 of the Physical Stress Management Program chapter identifies subtopics that may need to be covered, such as: – Altitude – Fatigue – Vibration Stress – Overexertion injuries/heavy manual labor	Physical Hazards Awareness Training does not have to be delivered as a standalone course, it can be covered during initial 40-hour HAZWOPER training and annual 8-hour HAZWOPER refreshers. Physical Hazards Training needs to include hazards employees encounter or potentially encounter during field work.as needed for job
	Hearing Conservation Awareness	1 hour of initial training required upon assignment to duties.	• EPA's Emergency Responder Health and Safety Manual (see Section 3.0 and Section 8.0 of the Physical Stress Management Program chapter) • SHEM Guideline 51 – Page 17 identifies occupational noise exposure as one of 18 topics that must be covered in initial 24-hour general field safety awareness training. – Table 51-1 (see page 63)	–

	Course Name (As Listed in the Agency's FRM)	Recommended Frequency/Length	Basis for Requirement and References That Provide Information on Course Content	Additional Notes
	Occupational Noise Exposure 29 CFR 1910.95 29 CFR 1926.52	30-45 minutes of initial training prior to any known high noise exposure or enrollment in the hearing conservation program	• 29 CFR 1910.95 • 29 CFR 1926.52 • EPA's Emergency Responder Health and Safety Manual (see Section 3.0 and Section 8.0 of the Physical Stress Management Program chapter) • SHEM Guideline 51 – Page 17 identifies occupational noise exposure as one of 18 topics that must be covered in initial 24-hour general field safety awareness training. – Table 51-1 (see page 77)	Emergency Responders must attend this training and be enrolled in EPAs Hearing Conservation Program only if their occupation noise exposure exceeds the 8-hour Time Weighted Average
Physical Stress Management (continued)	Occupational Noise Exposure Annual Refresher 29 CFR 1910.95 29 CFR 1926.52	30-45 minutes of Annual refresher training. General Awareness and specific provisions as outlined in the standard. Training in the use and care of all hearing protectors provided to employees in the Hearing Conservation Program.	• 29 CFR 1910.95 • 29 CFR 1926.52 • EPA's Emergency Responder Health and Safety Manual (see Section 3.0 and Section 8.0 of the Physical Stress Management Program chapter) • SHEM Guideline 51 – Page 17 identifies occupational noise exposure as one of 18 topics that must be covered in initial 24-hour general field safety awareness training. – Table 51-1 (see page 77)	Emergency Responders must attend this training and be enrolled in EPAs Hearing Conservation Program only if their occupation noise exposure exceeds the 8-hour Time Weighted Average.
	Heat and Cold Stress Awareness 29 CFR 1926.21(b)(4) SHEM Guideline 33	1 hour of initial training upon assignment to field duties (see Table 51-1 of SHEM Guideline 51) and as needed thereafter.	• EPA's Emergency Responder Health and Safety Manual (see Section 3.0 of the Physical Stress Management Program chapter) • SHEM Guideline 33 (see pages 22-23 and 29-30) • SHEM Guideline 51 – Page 17 identifies heat and cold stress as one of 18 topics that must be covered in initial 24-hour general field safety awareness training. – Table 51-1 (see page 63)	This topic does not have to be delivered as a standalone course. For example, it can be covered during an employee's 24-hour general field safety awareness training.
Transportation	Driver Safety – Defensive Driving	Minimum of 4 hours triennially.	• SHEM Guideline 31 • SHEM Guideline 51 – Page 18 of SHEM Guideline 51 identifies driver safety as one of three topics that must be covered during annual field safety refresher training. – Table 51-1 (see page 37)	The agency provides a variety of driving safety classes. Driver Safety – Defensive Driving is available the GSA Fleet Drive-Thru website Driver Safety – Field Activities training is available in EPAs Skillport eLearning System.
	Driver Safety – Field Activities	Minimum of 1.5 hours of initial training upon assignment to field duties and annual refreshers thereafter.		

	Course Name (As Listed in the Agency's FRM)	Recommended Frequency/Length	Basis for Requirement and References That Provide Information on Course Content	Additional Notes
Radiation Safety	Radiation Worker Basic Training 10 CFR 19 10 CFR 30 SHEM Guideline 38		• SHEM Guideline 38 (see Section 5) • EPA's Emergency Responder Health and Safety Manual (see Section 3.0 of the Radiation Safety Program chapter) • SHEM Guideline 51 – Table 51-1 (see pages 81 and 82)	Emergency responders must take exams (and attain a score of at least 80 percent) to demonstrate their understanding of course material. Radiation Worker Basic – Biennial Refresher is not required if the Emergency Responder has completed Radiation Worker – Advanced Training and is current with the Radiation Worker – Advanced Biennial Refresher
	Radiation Worker Basic – Biennial Refresher 10 CFR 19 10 CFR 30 SHEM Guideline 38			
	Radiation Worker – Advanced Training SHEM Guideline 38	4 to 5 days of initial training upon assignment to field duties (see SHEM Guideline 38) and 1- to 2-hour biennial refreshers thereafter (see SHEM Guideline 51).	• SHEM Guideline 38 (see Section 5) • EPA's Emergency Responder Health and Safety Manual (see Section 3.0 of the Radiation Safety Program chapter) • SHEM Guideline 51 – Table 51-1 (see pages 81 and 82)	Emergency responders must take exams (and attain a score of at least 80 percent) to demonstrate their understanding of course material.
	Radiation Worker – Advanced Biennial Refresher SHEM Guideline 38			
	Radiation Detection Instrumentation	Initially and biennially thereafter.	EPA's Emergency Responder Health and Safety Manual (see Section 5.1 of the Radiation Safety Program chapter)	These topics may be addressed as standalone training or as part of the above-listed basic or advanced radiation worker training series.
	Radiation Dosimetry (TLD) Awareness	30 minutes to 1 hour of initial training upon being enrolled in the dosimetry program.	• EPA's Emergency Responder Health and Safety Manual (see Section 4.2.1.1 of the Radiation Safety Program chapter) • SHEM Guideline 51 – Table 51-1 (see page 80)	
Chemical and Biological	Chemical and Biological Agent Awareness	One-time training requirement. 1 hour of refresher training as needed	EPA's Emergency Responder Health and Safety Manual (see Section 3.0 of the Chemical and Biological Agents chapter)	The training may be provided as a standalone course or as part of initial 40-hour HAZWOPER training or annual 8-hour refresher training.

	Course Name (As Listed in the Agency's FRM)	Recommended Frequency/Length	Basis for Requirement and References That Provide Information on Course Content	Additional Notes
Confined Space Safety	Confined Space Awareness SHEM Guideline 51	1 hour upon assignment and 1 hour of refresher training as needed	• 29 CFR 1910.146(g) • EPA's Emergency Responder Health and Safety Manual (see Section 3.14 and Table 3 of the Confined Space Safety Program chapter) • SHEM Guideline 51 – See Table 51-1 (page 32)	This training is required for all OSCs, even those who hire contractors to enter confined spaces and prohibit EPA employees from entering. The training may be provided as a standalone course or as part of initial 40-hour HAZWOPER training or annual 8-hour refresher training.
	Confined Space Permit Required – Entry Supervisor Certification 29 CFR 1910.146	1 day of initial training upon assignment to duties training and 1-hour biennial refreshers thereafter.	• 29 CFR 1910.146(g) • 29 CFR 1926 Subpart AA • EPA's Emergency Responder Health and Safety Manual (see Section 3.14 and Table 3 of the Confined Space Safety Program chapter) • SHEM Guideline 51 – See Table 51-1 (page 32)	This training is required for emergency responders who have been assigned entry supervisor duties .
	Confined Space Permit Required – Entry Supervisor Certification Refresher 29 CFR 1910.146			
	Confined Space Permit Required – Entrant/Attendant Certification 29 CFR 1910.146	2 to 3 days of initial training upon assignment to duties (see Table 51-1 of SHEM Guideline 51) and 1-hour biennial refreshers thereafter.	• 29 CFR 1910.146(g) • 29 CFR 1926 Subpart AA • EPA's Emergency Responder Health and Safety Manual (see Section 3.14 and Table 3 of the Confined Space Safety Program chapter) • SHEM Guideline 51 – See Table 51-1 (page 33)	This training is required for emergency responders who may need to enter a confined space with unknown or known hazards.
	Confined Space Permit Required – Entrant/Attendant Certification Refresher 29 CFR 1910.146			

	Course Name (As Listed in the Agency's FRM)	Recommended Frequency/Length	Basis for Requirement and References That Provide Information on Course Content	Additional Notes
Confined Space Safety (continued)	Confined Space Permit Required – Rescue Team Certification 29 CFR 1910.146	1 day of initial training upon assignment to duties and 1-day-long annual refreshers thereafter.	• 29 CFR 1910.146(g) • 29 CFR 1926 Subpart AA • SHEM Guideline 51 – See Table 51-1 (page 33) • EPA's Emergency Responder Health and Safety Manual (see Section 3.14 and Table 3 of the Confined Space Safety Program chapter)	This training is required for emergency responders who have been assigned potential rescue duties.
	Confined Space Permit Required – Rescue Team Annual Refresher 29 CFR 1910.146			
Bloodborne Pathogens	Bloodborne Pathogens (BBPs) 29 CFR 1910.1030	1 to 2 hours of initial training upon assignment to duties and annual refreshers (also 1 to 2 hours long) thereafter (see SHEM Guideline 51).	• 29 CFR 1910.1030(g)(2) • EPA's Emergency Responder Health and Safety Manual (see Section 3.6 of the Bloodborne Pathogen Exposure Control Plan) • SHEM Guideline 51 – See Table 51-1 (page 28)	–
	Bloodborne Pathogens (BBPs) Annual Refresher 29 CFR 1910.1030			

3.2 Additional Health and Safety Training That May Be Required

The trainings listed above in Table 1 identify the *minimum* core health and safety requirements that OSCs and Special Team Members must complete to ensure that they are adequately prepared to identify and mitigate potential job-related hazards in the field. Other Emergency Responders will also need to complete the training listed above in Table 1 based on specific job duties. OSCs, Special Team Members, and other Emergency Responders may also need to complete additional health and safety training depending on their regional or special team affiliation and their specific job assignments.

3.2.1 Region-Specific or Special Team-Specific Requirements

Individual regions or special teams may identify additional health and safety training requirements to prepare OSCs to address hazards that are unique to a particular geographical area or to meet state regulatory requirements. The OSC Readiness Task Force's August 2011 document, titled *Training Requirements and Professional Development Guidelines for U.S. EPA On-Scene Coordinators*, provides the following as an example:

> Region 6 performs a significant amount of oil field work during the normal course of business. Region 6 requires EPA workers who perform oil-field activities to complete a hydrogen sulfide safety (sour gas) course and appropriate refreshers. Certain states have this requirement as well.

If regions or special teams have identified additional health and safety training that their OSCs must take, these requirements should be documented in Appendix B of this chapter.

3.2.2 Training Needs Associated With Specific Job Assignments

Individual OSCs and other Emergency Responders may also require additional health and safety training if they are assigned to work at sites where they could be exposed to an OSHA-regulated hazard listed in 29 CFR 1910 Subpart Z or some other hazard (e.g., operating a utility vehicle). For example, employees assigned to work at sites with asbestos-containing material (or presumed asbestos-containing material) will be required to take an asbestos-related course such as Asbestos Awareness or a more detailed course depending on the level of anticipated exposure. Similarly, employees reporting to a site with known carcinogens (e.g., acrylonitrile, benzene, OSHA's 13 carcinogens) may be required to take additional chemical-specific training as well.

Immediate supervisors and SHEMP Managers (assisted by HSPCs) are responsible for assessing each Emergency Responder's specific job tasks to determine if he or she requires additional training that goes beyond core health and safety training requirements. SHEM Guideline 51 provides two user-friendly tables that will assist with this endeavor. The first one (labeled Table 51-

Examples of Additional Courses That OSCs *Might* Require Depending on Their Specific Assigned Duties

****Not a Comprehensive List****

- 13 Carcinogens
- Acrylonitrile
- Arsenic – Inorganic
- Asbestos Awareness
- Boating Safety Awareness
- Cranes, Derricks, Hoists, Elevators, and Conveyers
- Drum Handling Awareness
- Electrical Training
- Excavation/Trenching and Shoring
- Explosives and Blasting Agents
- Methylene Chloride
- Mine Safety Awareness
- Scaffolding
- Stack Sampling Safety Awareness
- Subsurface Investigations Safety Awareness
- X-ray Safety Awareness

Source: SHEM Guideline 51 (Table 51-2)

1) identifies course titles, outlines the content associated with each course, and includes a column that provides insight on which individuals might require the course. The second table (labeled Table 51-2) presents a matrix with course titles listed in rows and more than 10 EPA employee categories (e.g., field workers, dive team members, laboratory workers) listed in the columns. The matrix is populated with the letters "R" and "J."

3.3.3 Health and Safety Considerations During Trainings and Exercises

Many of the health and safety hazards present on an actual hazmat incident or removal site are also present during trainings, exercises and drills. A health and safety plan (HASP) can be developed for these events to evaluate the hazards and mitigate the risk of injury. The health and safety plan development process follow the same steps taken for an emergency response or removal. See Chapter 1, Site Specific Health and Safety Plan Development for details.

The drill safety plan is written to protect participants from any real-world hazards that might have been present and from any hazards directly related to the exercise or training. Emphasis should be given to using the Incident Command System (ICS) and the Incident Action Plan (IAP) development process to organize and manage the training or exercise.

Training and exercise design should follow "the practice like you play" methodology. A training or exercise that follows the processes and procedures used and employed during an actual event or response will better prepare emergency responders for the real-world incidents. Level A and B exercises should include a realistic scenario and practice the use of radio communications, air monitoring and sampling equipment and other tools that will be used during an actual incident or response. Competence with PPE and response equipment is a critical aspect of an emergency responder health and safety program.

4.0 ONSITE SAFETY BRIEFINGS

Section 3.0 of this chapter addresses health and safety training requirements that must be completed before Emergency Responders report for duty in the field. Once they arrive at a specific site, they will continue to receive training in the form of onsite safety briefings.

In accordance with 29 CFR 1910.120(b)(4)(iii), pre-entry briefings ("tailgate meetings") must be conducted in the field at the start of each work shift to alert emergency responders of the hazards associated with a particular site. All personnel who might enter a site must attend the briefings. Discussion topics and attendance should be documented. A training roster or sign-in sheet may be used for this purpose (see the "Forms" section of the manual's website for a sample roster). Documentation should be retained in site files.

The briefings must identify the technical work objectives for the shift and cover the most significant safety and health issues that may be encountered. At least once a week during a field activity, the pre-entry briefing must also include a review of other site-specific HASP issues, such as evacuation procedures and protocols for handling onsite injuries. The information provided during pre-entry briefings is also covered by Incident Command System operations briefings.

5.0 AVAILABLE TRAINING RESOURCES AND TOOLS

As noted above, SHEMP Managers (assisted by HSPCs) must schedule and provide training for OSCs. A variety of resources are available to assist with this effort. The EPA OSC website has developed a training webpage that provides links to numerous training-related resources and tools (e.g., TrainEx Training Exchange, Environmental Response Training Program Virtual University, OLEM Training Forum,

National Enforcement Training Institute, FEMA Emergency Management Institute). Additionally, the manual's website includes a webpage titled "Training and Tools," which is currently under construction. Once completed, this webpage will offer sample training materials, present useful weblinks, provide sample training schedules, and post upcoming training events.

APPENDIX A

Health and Safety Training Program: Designation of Roles and Responsibilities

Instructions for Users

Appendix A provides a place for users to insert organization-specific information into the Health and Safety Training Program chapter. The appendix presents a list of tasks that must be performed to ensure that regions or special teams are administering an effective health and safety training program for OSCs. Tasks are listed in rows. EPA position titles (e.g., Removal Manager, Health and Safety Program Contact) are listed in columns. Each task has been assigned to a default position. For some of the tasks, check marks have been placed in two or more columns to indicate that more than one person is responsible for that task. **Please note that users can re-delegate tasks.**

Users must take the following steps to customize Appendix A:

- Fill in the background information requested at the top of page A-3. For example, indicate when the table is being updated and who is doing the updating.

- Fill in actual names under the position titles.

- Add additional key players to the table (if necessary). *Note: The chapter authors have already provided a placeholder to add a new position, as the last column is labeled "Other." Users should customize this column to identify the position title (and name) of any additional key player assigned responsibility to administer the training program. Users can insert more columns to include additional key players (if necessary).*

- Add rows to the table (if necessary) to provide information about activities that exceed the minimum requirements already included in Appendix A. (See Appendix B for a list of your organization's additional policies and procedures related to this chapter.)

- Determine whether any of the recommended task assignments must be delegated to another person. (If so, move the check marks to re-assign the task.)

- Ensure that each task has been assigned.

ATTENTION OLEM Special Teams and Headquarters Users: The tasks and position titles that appear in Appendix A have been written with regional audiences in mind. OLEM special teams and Headquarters users should modify the language that appears in the rows and column headers to reflect the needs of their organization.

APPENDIX A
Task Table for Implementing the Health and Safety Training Program Chapter

This table has been customized for: Region 4**.**
Last Updated on: March 2, 2017**.**
Updated by: Kevin Eichinger**.**

	Who Is Responsible for Each Task or Action?						
ROLES ► **TASKS ▼** **See Appendix A-2 in the Introduction Chapter for the names of Regional Personnel who fill these roles.**	**Removal Manager**	**SHEMP Manager**	**Health and Safety Program Contact**	**Immediate Supervisor**	**Data Manager**	**Emergency Responders and OSCs**	**Other**
1. Implement the Health and Safety Training Program chapter by: (1) customizing the chapter with organization-specific information, (2) reviewing/updating the customized version annually, and (3) adopting the requirements and practices in the chapter. Post the customized chapter to the manual's website and inform stakeholders of its availability.	✓	✓	✓	✓	✓	✓	
2. Determine which training OSCs will need to ensure that they have the knowledge and skills needed to work safely in the field. • Include core requirements for OSCs (see Table 1). • Assess each OSC's specific job tasks to determine if he or she requires additional training that goes beyond core requirements.		✓		✓			
3. Provide health and safety training to OSCs.		✓	✓				
4. Ensure that OSCs attend health and safety training.				✓			
5. Obtain documentation (e.g., a certificate) each time you successfully complete a training course or exercise. Present a copy to your SHEMP Manager (or another designated person) and retain a copy for your files.						✓	
6. Document the completion of health and safety training requirements in the FRM and: • Track which OSCs have met their training requirements. • Contact OSCs who have not completed necessary training to inform them that they need to do so and to alert them of the next available training session. • Alert the immediate supervisor and the Removal Manager (or another designated person) if an OSC has not met a training requirement.		✓	✓		✓		
7. Prevent OSCs from working in the field (or at a minimum restrict their job assignments) if they have not completed all required health and safety training.	✓						
8. Ensure that (1) pre-entry briefings are held at the start of each shift, (2) all onsite personnel attend, (3) discussion topics and attendance are documented, and (4) documentation is retained in site files.	✓		✓			✓	

*Note: A list of the organization's emergency responders (including OSCs) is provided in Appendix A-2 of the Introduction chapter.

APPENDIX B

Health and Safety Training Program: Documentation of Additional Policies and Procedures

The procedures and tasks outlined in the Health and Safety Training Program chapter represent the **minimum requirements** that each EPA organization must meet. If organizations wish to require additional training or advocate the use of additional policies and procedures, they must document them in the table below. After doing so, they must also:

- Ensure that any of the additional policies and procedures that are added to the table below are also addressed in the main text of the chapter. This can be accomplished by either (1) inserting the additional policies and procedures directly into the relevant portions of the main body of the chapter or (2) adding a sentence within the main text that directs readers to Appendix B for more information.

- Update Appendix A to capture any additional tasks that are listed in the table below and ensure that each task is assigned to a specific individual.

Topic	**Please document any additional elected policies and procedures required for your organization here**
Section 2.0 Roles and Responsibilities	See R4 ERRB Standard Operating Guidelines at https://response.epa.gov/hsmanualregion4 1. A103: Health and Safety Training Plan 2. A103A: Responder in Training, Basic Training Requirements
Section 3.0 Health and Safety Training Requirements	
Section 4.0 Onsite Safety Briefings	
Other topics:	