THE APPLICATION OF OSHA, EPA, AND DOT TRAINING REQUIREMENTS TO HIGHWAY DEPARTMENT OPERATIONS

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Hazardous Waste Operations and Emergency Response; Final Rule: March 6, 1989 [Corrections: April 13, 1990]
29CFR1910.120

(e) Site Worker Training Requirements [p. 9320]

(2) Elements to be covered

(3) Initial training

(4) Management and Supervisor training

(7) Emergency Response training (see § (l))

(8) Refresher training

(9) Equivalent training

(i) Information Programs (as part of the employers safety and health program) [p. 9323]

(l) Emergency Response by Employees at Uncontrolled Hazardous Waste Sites [p. 9325]


(1) Safety and Health program

(2) Hazard Communication program

(3) Medical Surveillance program

(4) Decontamination program

(5) New Technology program

(6) Material Handling program

(7) Training program

(i) New employees

(ii) Current employees

(8) Emergency response program

(i) Emergency response plan

(iii) Training for emergency response employees
(iv) Procedures for handling emergency incidents

(q) Emergency Response to Hazardous Substances [First Responder, Hazardous Materials Training] [p. 9328]

(4) Skilled support personnel

(5) Specialist employees

(6) Training
   (i) First responder awareness level
   (ii) First responder operations level
   (iii) Hazardous materials technician
   (iv) Hazardous materials specialist
   (v) On scene incident commander

(8) Refresher training


(c) (7) Training and Communication [p. 36689]

   (i) Employer shall provide training to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of energy sources are acquired by employees.

   (B) purpose and use of energy control procedure

   (C) instruction of other employees concerning procedure

   (ii) Limitations of tagout systems

   (iii) Employee retraining (whenever there is a new hazard or change in procedure)

   (C) retraining shall reestablish employee proficiency

   (iv) Employer shall certify that employee training has been accomplished and is being kept up to date.


(b) Application [p. 6403]

   (i) Processes involving listed chemicals at or above the threshold quantities

   (ii) Processes involving flammable liquids or gases in quantities of 10,000 pounds or more except for fuels and liquids stored below their atmospheric boiling point without chilling or refrigeration

   (iii) Manufacture of explosives

   (iv) Manufacture of pyrotechnics

   (v) New chemicals with a Substance Hazard Index greater than 5000 when there is an amount of 500 pounds or more
(d) Process safety information to be compiled and communicated to employees; to include information about the hazards of chemicals, technology of the process, and equipment in the process.

(g) Training [p. 6405]

(1) Initial for current employees and new employees before working in a newly assigned process: to include an overview of the process and the operating procedures; emphasis on the specific safety and health hazards, procedures, and safe practices.

(2) Refresher and supplemental training: provided to each employee annually to assure that the employee understands and adheres to current operating procedures of the process.

(3) Training certification: employer shall certify that each employee has received and successfully completed training.

Permit Required Confined Spaces; Final Rule: January 14, 1993. 29CFR1910.146

(c) Permit Required Confined Space Program (Entry Permit Program) [p. 4549]

Under the entry program the employer shall:

(1) Hazard identification: identify and evaluate each hazard of the permit spaces

(2) Hazard control: establish and implement the means, procedures, and practices by which the permit spaces can be entered safely

(3) Permit system: establish a written permit system for the proper preparation, issuance, and implementation of entry permits

(4) Employee information: post signs near permit spaces to notify employees what hazards may be present and that only authorized entrants may enter the permit spaces

(5) Prevention of unauthorized entry: prevent unauthorized employee entry through such measures as training or by posting signs and barriers

(6) Employee training: train employees, as provided by this standard, so that attendants, authorized entrants and personnel authorizing or in charge of entry can work safely in and around the permit space

(7) Equipment: provide, maintain, and ensure the proper use of the equipment necessary for safe entry, including testing, monitoring, communication, and personal protective equipment

(8) Rescue: ensure that the procedures and equipment necessary to rescue entrants from permit spaces are implemented and provided

(e) Training and Duties of Authorized Entrants [p. 4553-4554]

Employer shall ensure that employees who work as authorized entrants receive the appropriate training ... as follows:

(1) Hazard recognition

(2) Communication

(3) Protective equipment

(4) Self-rescue
(f) Training and Duties of the Attendant

Employer shall ensure ... that employees who work as attendants receive the appropriate training ... as follows:

(1) Number of entrants

(2) Hazard recognition

(3) Communication

(4) Rescue: employer shall ensure that attendants:

   (i) do not enter the permit space to attempt rescue of entrants, and

   (ii) properly use any rescue equipment provided for their use and perform any other assigned rescue and emergency duties, without entering the permit space.

(g) Training and Duties of the Individual Authorizing or In Charge of Entry

Employer shall ensure that ... receive the appropriate training ... as follows:

(1) Entry authorization and supervision

(2) Dealing with unauthorized personnel

(h) Rescue Team

The employer shall have either an in-plant rescue team or an arrangement under which an outside rescue team will respond to a request for rescue services

(1) In-plant rescue team: employer shall ensure that:

   (i) personnel are provided with and trained to use properly

   (ii) the in-plant rescue team is trained to perform the assigned rescue functions and has received the training required of authorized entrants.

   (iii) rescue teams practice making permit space rescues at least once every twelve months, by means of simulated rescue operations in which they remove dummies, mannequins, or personnel through representative openings and portals whose size, configuration, and accessibility closely approximate those of the permit spaces from which rescues may be required and

   (iv) at least one member of each rescue team maintains current certification in basic first-aid and cardiopulmonary resuscitation (CPR) skills.

(f) Employee Information and Training [p. 3329]

(1) The employer shall provide employees with information and training to ensure that they are apprised of the hazards of chemicals present in their work area.

(2) Such information should be provided at the time of an employee's initial assignment to a
work area where hazardous chemicals are present and prior to assignments involving new exposure situations. The frequency of refresher information and training shall be determined by the employer.

(3) Information: employees shall be informed of:

(i) contents of the standard

(ii) location and availability of the employer’s Chemical Hygiene Plan

(iii) the PEL’s and OSHA regulated substances

(iv) signs and symptoms associated with exposures to hazardous chemicals used in the laboratory

(v) location and availability of known reference material on the hazards, safe handling, storage, and disposal of hazardous chemicals found in the laboratory

(4) (i) Training: employee training shall include:

(A) methods and observations that may be used to detect the presence or release of a hazardous chemical

(B) physical and health hazards of chemicals in the work area

(C) measures employees can take to protect themselves from these hazards ... such as appropriate work practices, emergency procedures, and personal protective equipment to be used.

(ii) the employee shall be trained on the applicable details of the employer’s written Chemical Hygiene Plan


(d) Selection: Based on an assessment of the workplace hazards relative to personal protective equipment (PPE), employers shall select the types of PPE which will protect employees from the particular occupational hazard(s) they are likely to encounter.

(f) Training: Employees shall be trained in the proper use of their personal protective equipment.

RCRA Personnel Training. 40CFR265.16

(a) (1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility’s compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section.

(2) This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

(3) At a minimum, the training program must be designed to
ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:

(i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;

(ii) Key parameters for automatic waste feed cut-off systems;

(iii) Communications or alarm systems;

(iv) Response to fire or explosions;

(v) Response to ground-water contamination incidents; and

(vi) Shutdown of operations.

(b) Facility personnel must successfully complete the program required in paragraph (a) of this section within six months after the effective date of these regulations or six months after the date of their employment or assignment to a facility, or a new position at a facility, whichever is later. Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements of paragraph (a) of this section.

(c) Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

(d) The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

(2) A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;

(3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section.

(4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.

(e) Training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.


The term "hazardous materials" means any substance or material including a "hazardous substance" and a "hazardous waste", as those terms are defined by DOT and EPA regulations. [Generally, any virgin
or waste chemical or petroleum product fits the definition.]

Training is required of all employees who directly affect hazardous materials transportation safety, including employees who-

(i) load, unload, or handle hazardous materials

(ii) prepare hazardous materials for transportation

(iii) operate a vehicle used to transport hazardous materials

Classification of Training (for each employee) and Objectives

(1) General Awareness Training

(i) to provide familiarity with the DOT hazardous materials requirements

(ii) to enable the employee to recognize and identify hazardous materials

(2) Function-specific Training

(i) to enable the employee to better perform his/her individual job function relative to the DOT requirements

(3) Safety Training

(i) to provide emergency response information required by Subpart G of Part 172 (see attached)

(ii) to inform employees of measures to protect them from the hazards associated with hazardous materials to which they may be exposed, including specific measures the employer has implemented to protect employees from exposure

(iii) to inform employees of methods and procedures for avoiding accidents, such as the proper procedures for handling packages containing hazardous materials

Training Schedule

(1) Initial Training

(i) must be completed before October 1, 1993 for current employees and those hired on or before July 2, 1993

(ii) must be completed within 90 days for employees hired after July 2, 1993

(2) Job Transfer Training

(i) within 90 days of the transfer for employees handling hazardous materials

(3) Recurrent (Refresher) Training

(i) at least once every two years

Training Records

(1) Current training records, inclusive of the preceding two years, must be created and retained by the employer for each employee for as long as the employee handles hazardous materials and for 90 days thereafter. The record shall include the-

(i) employee’s name

(ii) most recent training completion date

(iii) description, copy, or location of the training materials
(iv) name and address of the person providing training

(v) certification that the employee has been trained and tested

Testing Requirements

(i) testing is required by section 106(b)(6) of the Hazardous Materials Transportation Act. Each employer must certify that the employees who handle hazardous materials "are trained and have been tested in their respective transportation areas of responsibility".