

## SAMPLE HEALTH AND SAFETY PLAN (HASP)

Source: OSHA.

### 4.0 TRAINING PROGRAM

(in compliance with 29 CFR 1910.120 (b)(4)(ii)(B), 29 CFR 1910.120(e) and 29 CFR 1910.120 (q)(11))

The site training program is designed to ensure that workers receive the training they need to work safely. Site safety and health training requirements are based on the job hazard assessments contained in Chapter 2 of this HASP and relevant OSHA requirements.

At this site, \_\_\_\_\_ oversees the implementation of this training program and is responsible for ensuring that employees are adequately and currently trained for all tasks they are asked to perform. Employees who have not been trained to a level required by their job function and responsibility are not permitted to participate in or supervise field activities.

This training program is consistent with the requirements of 29 CFR 1910.120(e) and (q)(11) and addresses the following site-specific information:

- ) initial training for site workers & supervisors
- ) exceptions to initial training requirements
- ) site briefings for visitors and workers
- ) refresher training
- ) qualification of trainers
- ) training certification
- ) emergency response training

#### 4.1 Initial Training for Site Workers and Supervisors

Initial training requirements are based on the designation of the site as either post-emergency response operations or as a government identified uncontrolled hazardous waste site, a worker's potential for exposure, and compliance with the applicable regulatory requirements of 29 CFR 1910.120 (q)(11) and/or (e)(3).

Choose either Option 1 or Option 2 for the text of Section 4.1 only. Although these options are not mutually exclusive, site workers for any given contractor will generally fall into only one category. Choose the option appropriate and delete the text associated with the other option. Option 1: post-emergency response clean-up conducted by workers involved in the emergency response. Option 2: post-emergency response clean-up conducted by workers that were not part of the initial emergency response.

[Help Text - Initial training may be conducted in compliance with either 29 CFR 1910.120 (q)(11) and/or (e)(3), depending on the designation of the site. If the clean-up is being conducted after the completion of an emergency response, training requirements for post-emergency response operations are identified in (q)(11). Under this paragraph, employers may choose to comply with paragraphs (b)-(o) or provide more limited training if the clean-up is done by the workers who were initially involved in the emergency response. Training requirements for workers involved in the initial emergency response include those identified in 29 CFR 1910.38, 1910.134, 1910.1200, and other health and safety training as necessary for the tasks the workers will conduct. If the site is designated an uncontrolled hazardous

waste site by a governmental agency, or if the employer must otherwise comply with paragraphs (b)-(o), initial training requirements are identified in paragraph (e)(3).]

**(Option 1)**

Emergency response personnel conducting the post-emergency clean-up at this site have successfully completed training in compliance with the requirements of 29 CFR 1910.120 (q)(6) for the emergency response roles they are assigned. These personnel have also successfully completed training addressing the emergency action and/or response plan for the site, respiratory protection consistent with 29 CFR 1910.134(k), and hazard communication consistent with 29 CFR 1910.1200(h). Finally, these personnel received training in the topics identified in Table 4-1, addressing the other health and safety hazards associated with the site and clean-up operations.

<b>Table 4-1 Initial Training Requirements</b>
(Identify the training topics covered in any additional training for workers at this site. Training should address the additional health and safety hazards associated with the site, such as exposure to decontamination agents. Training should include information about the signs and symptoms of exposure, decontamination procedures, and the exposure controls necessary for conducting site tasks safely. Please insert a row for each course, or alter this table as appropriate for your site.)

**(Option 2)**

Personnel at this site have successfully completed 40-hour initial HAZWOPER training consistent with the requirements of 29 CFR 1910.120(e)(3)(i), or have received equivalent training consistent with the provisions of 29 CFR 1910.120(e)(9), in order to work in contaminated areas. In addition, such personnel have received 3 days of supervised field experience applicable to this site.

The initial training provided to these workers addresses:

- ) names of personnel and alternates responsible for site safety and health
- ) safety, health and other hazards present on the site
- ) use of PPE
- ) work practices by which the employee can minimize risks from hazards
- ) safe use of engineering controls and equipment on the site
- ) the site control plan detailed in Chapter 3 of this HASP
- ) medical surveillance requirements detailed in Chapter 5 of this HASP
- ) the spill containment program detailed in Chapter 9 of this HASP
- ) decontamination procedures detailed in Chapter 10 of this HASP
- ) the emergency response plan detailed in Chapter 11 of this HASP
- ) confined space entry procedures detailed in Chapter 13 of this HASP (delete if confined spaces are not a hazard on this site)

Additional training provided for site workers is listed in Table 4-1a.

<b>Table 4-1a Other Training for Site Workers</b>
(This is a table. List the other training courses that your employees working on this site receive. Please insert a row for each course, or alter this table as appropriate for your site.)

### Management and Supervisor Training

On-site managers and supervisors who are directly responsible for or who supervise workers engaged in hazardous waste operations receive, in addition to the appropriate level of worker HAZWOPER training described above, eight (8) additional hours of specialized supervisory training, in compliance with 29 CFR 1910.120(e)(4).

Training received by managers and supervisors is summarized in Table 4-1b:

<b>Table 4-1b Training for Managers and Supervisors</b>
(Identify the topics covered in the eight additional hours of training for Managers and Supervisors. These courses should cover the employer’s health and safety program, PPE program, spill containment program, and health hazard monitoring procedure and techniques, as required under 1910.120 (e)(4). Please insert a row for each course, or alter this table as appropriate for your site.)

**(End Option 2)**

### 4.2 Exceptions to Initial Training

(Identify site workers that do not fit into Options 1 or 2 above. These will probably be workers who will not be working in one of the control zones, but will be on site, like office personnel. If there are no workers who fall into this category, use Option 3 text below, and delete the text of Option 4.)

**(Option 3)**

All employees at this site have training consistent with what is described in Section 4.1. There are no exceptions.

**(Option 4)**

Exceptions to the training requirements listed in Section 4.1 are summarized in Table 4-2. These exceptions include the following workers or categories of workers, based on the duration of their work at this site and their potential for hazardous exposures.

<b>Table 4-2 Exceptions to Initial Training</b>		
Worker or Category of Worker	Training Required	Reason for exception
(Identify each group of workers that do not require initial HAZWOPER training listed in Section 4.1. Insert a row for each group or alter this table as appropriate for your site.)	(Identify the initial training they will need, such as a site briefing.)	(Identify why this group does not need initial HAZWOPER training)

### 4.3 Site-Specific Briefings for Visitors and Workers

A site-specific briefing is provided to all individuals, including site visitors, who enter the site beyond the initial point of access, located (location) and clearly marked by (indicate how access point is marked).

For visitors, the site-specific briefing provides information about site hazards, the site lay-out including work zones and places of refuge, the emergency alarm system and emergency evacuation procedures, and other pertinent safety and health requirements as appropriate.

### 4.4 Refresher Training

All workers on this site, including managers and supervisors, receive annual HAZWOPER refresher training consistent with the requirements of 29 CFR 1910.120 [select the appropriate paragraph (e)(8) or (q)(8)]. Table 4-4 details the refresher training:

<b>Table 4-4 Refresher Training Topics</b>
(Identify the topics covered in the refresher training for each group of workers. Managers and Supervisors should receive refresher training specific to their functions and duties. Refresher training should include critiques of incidents that occurred in the past year and other relevant topics as required in 1910.120 (e)(8); or for workers initially trained under 1910.120(q)(6), should be of sufficient content and duration to maintain competencies as required in 1910.120 (q)(8). Please insert a row for each course, or alter this table as appropriate for your site.)

### 4.5 Qualification of Trainers

Only instructors qualified in accordance with 29 CFR 1910.120 [select the appropriate paragraph (e)(5) or (q)(7)] are used to train workers for this site. Qualified instructors have either completed a training program for the subjects they are expected to teach, or have the academic credentials and instructional experience necessary for teaching these subjects.

#### 4.6 Training Certification

This site maintains written certification of the successful completion of applicable training requirements for all personnel. Training records are maintained up-to-date and are retained onsite at the following location: (identify location).

Employees and supervisors receive a written certificate when they complete necessary training and field experience. Any person who has not been so certified or who does not meet the requirements of equivalent training is prohibited from engaging in the clean-up operations on this site.

#### 4.7 Emergency Response Training

Emergency response training is addressed in Chapter 11 of this HASP, Emergency Response Plan.

#### 4.8 References

(This section is optional. You may include these references in your program if you wish.)

OSHA Fact Sheet and References on Worker Health and Safety for Anthrax Exposure,  
<http://www.osha.gov/bioterrorism/anthraxfactsheet.html>

CDC Anthrax Information, <http://www.bt.cdc.gov/Agent/Anthrax/AnthraxGen.asp>  
Occupational Exposure To Anthrax: OSHA Frequently Asked Questions,  
<http://www.osha.gov/bioterrorism/anthrax/faqs.html>

EPA Anthrax Webpage, Fact Sheets section, <http://www.epa.gov/epahome/hi-anthrax.htm#ANTHRAXFACTSHEETS>