

HAZWOPER

By Mac McNulty

HazWOPER is not the trade name for some fast food chain hamburger. It is an acronym for a regulation written as an interim standard in 1986 and became final (mandatory) in 1991. HazWOPER stands for **H**azardous **W**aste **O**perations and **E**mergency **R**esponse.

It was mandated by Congress in 1986 when Congress passed SARA (Superfund Amendments Reauthorization Act), which charged the Occupational Safety and Health Administration (OSHA) to come up with standards to train people who will cleanup hazardous waste and materials. OSHA promulgated several CFRs (CFR stands for Code of Federal Regulations) for both the construction and general industry.

Since federal, state and county agencies are not subject to OSHA standards, the U.S. Environmental Protection Agency (EPA), which all have to abide by, wrote a standard two paragraphs long, and to paraphrase it says everybody who has to cleanup a Superfund site or respond to a chemical release must have either a site-specific safety and health plan or an emergency response plan, and train personnel, prior to them commencing the work.

HazWOPER has three areas of concern. The first one is actual Superfund cleanup sites, voluntary cleanups (to sell the property), or closure of a permitted hazardous waste storage facility at a company. The level of training required will depend on the type of tasks the individual will be executing and the potential of exposure to hazardous materials.

The first level consists of 40 hours (hence 40-Hour HazWOPER) of offsite training and then three days of onsite supervision. It is for anyone who will be working in a potentially dangerous environment or will be supervising someone working in said environment. This would typically be employees for environmental consultants or engineers, asbestos and lead abatement workers, or remediation workers. Occasionally, I get an environmental manager from industry who are designated the emergency coordinator or in charge of the company's spill response program.

The second level of training is 24 hours in length, with one day of supervision. It is for occasional site workers who will not be exposed to health hazards above a permissible exposure limit. This is the minimum level for government inspectors to get on to any cleanup site or Treatment, Storage, and Disposal Facility (TSDF), such as a hazardous waste landfill or incinerator.

Regardless of which level of initial training is received, OSHA requires an annual refresher of eight hours of training to maintain qualification.

The second area of concern in HazWOPER is the TSDFs that handle hazardous waste. The training needed is a minimum of 24 hours in length with an annual 8-hour refresher. Training should include emergency response procedures and equipment.

The final area HazWOPER covers is emergency response regardless of where it happens. There are actually five levels of training in this section; depending on the response effort to be taken:

First Responder Awareness Level – 1 to 2 hours
First Responder Operations Level – minimum 8 hours
Hazardous Materials Technician Level – minimum 24 hours
Hazardous Materials Specialist Level – 24 hours plus
On-Scene Incident Commander – 24 hours plus Ops Level

Awareness level is for companies that need staff to report spills but take no further action other than to leave the area. Operations level training is for staff that is expected to respond to a spill with the intent to make sure the area is evacuated and secured. Next, they may take steps to minimize the size of the spill safely. They may shut off a valve at a distance from the spill. But they are not to plug, patch or otherwise stop the release at the source of the spill. The training required to stop a spill at the source is the HazMat Technician level. The annual refreshers for these vary in length depending on the level of initial training received.

We presently offer the 24-hour and 40-hour HazWOPER, as well as the 24-Hour Technician classes as open enrollment workshops. At the end of this month, I will be conducting the first Incident Commander class for industry. I can provide all of the above training to companies, except for the Hazardous Material Specialist level. We are doing 8-hour refreshers and 24-hour Technician workshops for facilities presently.

Mac McNulty has more than 20 years experience in the areas of chemistry, safety and health, and remediation/emergency response.