Directly Taken from <https://www.osha.gov/SLTC/emergencypreparedness/hazwoper/preparedness.html#collapse2>

Note: Hyperlinks in document work.

[Workers in TSD Facility Operations](https://www.osha.gov/SLTC/emergencypreparedness/hazwoper/preparedness.html%22%20%5Cl%20%22collapse2%22%20%5Co%20%22Workers%20in%20TSD%20Facility%20Operations)

Workers engaged in operations involving hazardous waste TSD facilities regulated under 40 CFR Parts 264 and 265 pursuant to RCRA make up the second category of work operations covered by [29 CFR 1910.120(p)](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765).  Key provisions and employer requirements under paragraph (p) of HAZWOPER are summarized below.

Plan

***Safety and Health Program [***[***29 CFR 1910.120(p)(1)***](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(p)(1))***]***

Develop, keep onsite, and implement a written safety and health program for workers involved in hazardous waste operations.  Identify, evaluate, and control safety and health hazards to protect workers and respond promptly to emer­gencies. The program should address, as appropriate, site analysis, engineering controls, maximum exposure limits, hazardous waste handling procedures, and uses of new technologies.

**Safety and Health Program components (**[**29 CFR 1910.120, Appendix C**](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9768)**, compliance guidelines):**

1. Policy statements of the line of authority and accountability for implementing the program, the objectives of the program and the role of the site safety and health officer or manager and staff;
2. Means or methods for the development of procedures for identifying and controlling workplace hazards at the site;
3. Means or methods for the development and communication to employees of the various plans, work rules, standard operating procedures and practices that pertain to individual employees and supervisors;
4. Means for the training of supervisors and employees to develop the needed skills and knowledge to perform their work in a safe and healthful manner;
5. Means to anticipate and prepare for emergency situations and;
6. Means for obtaining information feedback to aid in evaluating the program and for improving the effectiveness of the program. The management and employees should be trying continually to improve the effectiveness of the program thereby enhancing the protection being afforded those working on the site.

***Hazard Communication [***[***29 CFR 1910.120(p)(2)***](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(p)(2))***]***

An effective hazard communication program is a key element required of TSD facilities. Develop a policy that meets the requirements of the Hazard Communication standard, [29 CFR 1910.1200](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=10099), and ensures that workers know about chemical haz­ards at the worksite, and how to protect themselves from hazards. Develop and implement the program, ensuring that workers know about chemical hazards at the worksite and appropriate protective measures. Include provisions for proper labeling of chemicals, access to safety data sheets, and appropriate worker training. Hazardous wastes are specifically excluded from the Hazard Communication Standard and, therefore, do not have to be included in the TSD's Hazard Communication program, but the program should include potential worker exposure to other hazardous "non-waste" chemicals at the facility.

***Medical Surveillance [***[***29 CFR 1910.120(p)(3)***](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(p)(3))***]***

Provide regular medical examinations and consultations for workers potentially overexposed to hazardous substances during their work. For each worker, keep a record of the medical examination, including the worker's name and the physician's written opinion relating to the worker's ability to perform the required tasks or to wear a respirator.  Table 6 outlines when medical examinations are required based on worker category. *See* [29 CFR 1910.120(f)](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(f)).

Table 6. Medical Examination Frequency

|  |  |
| --- | --- |
| Worker Category | When a Medical Exam is Required |
| * Workers who may be exposed to hazardous substances at or above permissible exposure limits or published exposure levels for those substances 30 or more days a year.
* Workers who wear a respirator for 30 or more days a year or who are required by [29 CFR 1910.134](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=12716) to wear a respirator.
* Members of HAZMAT teams.
* Workers who become ill or show signs or symptoms of possible overexposure to hazardous substances.
 | * Before assignment.
* Every 12 months unless the physician recommends a longer interval (not to exceed 24 months).
* At termination of employment and at reassignment.
* Immediately after reporting symp­toms indicating overexposure.
* As soon as possible after a worker reports signs or symptoms or possible overexposure to hazardous substances.
* When a physician determines that an examination is necessary.
 |

**Key points about the medical examination:**

* Medical examinations and procedures shall be performed by or under the supervision of a licensed physician,
* Provide the physician with information about the worker's duties, exposure levels, and PPE, and
* Provide the worker with a copy of the physician's written findings.

***Decontamination [***[***29 CFR 1910.120(p)(4)***](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(p)(4))***]***

Develop, implement, and communicate to workers decontamination procedures *before* they enter a hazardous waste site. Workers potentially exposed to hazardous substances must know how to decontaminate themselves, and decontaminate or properly dispose of contaminated equipment, including PPE. Establish decontamination areas that will minimize the exposure of uncontaminated workers or equipment. Decontaminate, clean, launder, maintain, or replace PPE to retain its effectiveness. Do not permit workers to launder contaminated clothing at home.Inform external laundry establishments of the hazardous nature of the laundry and the potentially harmful effects of the hazardous substances involved. *See* [29 CFR 1910.120(k)](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(k)).

When a hazardous waste cleanup operation will take six months or longer to complete, provide workers with showers and change rooms that meet the requirements of [29 CFR 1910.141, Subpart J – General Environmental Controls](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9790) (*see also* [29 CFR 1910.120(n)(7)](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(n)(7))). Workers must not remove their protective clothing or equipment from change rooms unless specifically authorized.

***New Technology Programs [***[***29 CFR 1910.120(p)(5)***](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(p)(5))***]***

Evaluate equipment with new technologies aimed at improving the protection of workers at worksites. Such equipment may include new foams, absorbents, adsorbents, and neutralizers potentially used to decrease exposures. Evaluation is necessary to determine the effectiveness of worker protection before implementing new technologies on-site. Review manufacturer and supplier information as part of the evaluation. *See* [29 CFR 1910.120(o)](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(o)).

***Handling Hazardous Materials [***[***29 CFR 1910.120(p)(6)***](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(p)(6))***]***

If drums or containers on the site (i.e., buried or above ground) need to be moved, inspect them for leaks or signs that they may fail. Consider unlabeled containers as containing hazardous materials, until chemical sampling verifies that their contents are not hazardous. Always use explo­sion-resistant equipment to handle containers in flammable atmospheres. *See* [29 CFR 1910.120(j)](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(j)).

**Controlling leaks and spills.** Train workers on procedures to contain leaks or spills and appropriate containment equipment. Provide salvage containers and absorbents at the site. Assess exposure risks *before* moving containers that show signs of weak­ness, bulging, or swelling, or containers that contain radioactive waste.

**Opening hazardous waste containers.** Use caution when opening containers with pressurized contents; open them from a remote location or use appropriate shielding. Workers not involved in opening such containers must keep a safe distance or be protected by a suitable shield. Allow only specially trained workers to open laboratory waste packs.

**Shock-sensitive waste.** Consider unidentified laboratory waste or any laboratory waste pack with crystallized material on the outside as shock-sensitive. When handling shock-sensitive waste, first evacuate all non-es­sential workers from the area, Use an employee alarm system to signal the start and completion of explosive waste handling activities. Use handling equipment that has explosion-resistant shields or barriers. Handlers must keep continuous communication with the site's safety and health supervisor.

***Worker Training [***[***1910.120(p)(7)***](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(p)(7))***]***

Ensure workers know about the site hazards and the risk of potential exposure, decontamination procedures, how to prevent and minimize exposures using engineering controls and PPE, medical surveillance procedures, and response procedures for emergencies. Provide workers initial and annual refresher training. The required hours of training vary for new workers, current workers, and trainers. *See* the ***Train*** section.

***Emergency Response [***[***1910.120(p)(8)***](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(p)(8))***]***

Include an emergency response plan (ERP) in the written program that ensures workers know what to do during an emergency at the facility. Employers who will evacuate their workers from the worksite location when an emergency occurs and do not permit any of their workers to assist in handling the emergency are exempt from developing an ERP. They must develop an Emergency Action Plan (EAP), required by [1910.38(a)](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_id=9726&p_table=standards#1910.38(a)), with procedures for immediate evacuation and train their workers accordingly. If workers will remain on-site during an emergency or assist in responding to an emergency, include the following elements in an ERP:

* Planning and coordination with outside parties,
* Personnel roles, lines of authority, and communication procedures,
* Possible emergencies and how to prevent them,
* Safe distances and places of refuge,
* Site control and security,
* Evacuation routes and procedures,
* Emergency decontamination procedures,
* Emergency medical treatment and first aid,
* Emergency communication procedures,
* Necessary emergency equipment, including PPE, and
* ERP evaluation criteria.

Train

TSD workers involved in hazardous waste operations are required to complete **initial training for 24 hours** and **refresher training for 8 hours annually**. OSHA requires that workers exposed to hazardous substances at TSD facilities receive HAZWOPER training as part of the site's safety and health program to ensure the ability to conduct assigned operations in a safe manner. The best way for workers to learn is through a combination of classroom instruction, site-specific information, and supervised field experience. Appropriately train workers before they begin their work and give them a [written certificate](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=20975) of competency, without which they cannot begin work at the site. Table 7 presents a summary of HAZWOPER training requirements for TSD facility workers.

**Table 7. HAZWOPER training requirements for TSD Facility workers**

|  |
| --- |
| **TREATMENT STORAGE AND DISPOSAL OPERATIONS** |
| ***WORKER CATEGORY*** | ***INITIAL*** | ***ANNUAL REFRESHER*** |
| **New worker** [29 CFR 1910.120(p)(7)(i)](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(p)(7)(i)) | **24 hour** initial training | **8 hours** |
| **Current worker** [29 CFR 1910.120(p)(7)(ii)](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(p)(7)(ii)) | None required if previous work experience and training is equivalent to the 24-hour training for new workers | **8 hours** |
| **Trainers** [29 CFR 1910.120(p)(7)(iii)](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9765#1910.120(p)(7)(iii)) | Satisfactory completion of a training course for subjects expected to teach and competent instructional skills | **Retain competency** for subjects expected to teach |