



The National Park Service EnviroFact Sheet

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Environmental and Health & Safety Training (G-4)

DRAFT

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APPLICABLE REGULATIONS

Federal

- Occupational Safety and Health Administration (OSHA) regulations at 29 CFR 1910.120, 1910.1200, and 1910.134.
- Resource Conservation and Recovery Act (RCRA) regulations at 40 CFR 262.34, 265.16, 265 Subpart C, 265 Subpart D, and 273.
- Oil Pollution Prevention regulations at 40 CFR 112.
- Department of Transportation (DOT) regulations at 49 CFR 173.

State

Most states have adopted the federal preparedness and prevention regulations. However, some state hazardous waste regulations may be more stringent than federal and should be reviewed.

Other

Local regulations and NPS/DOI policies and procedures should be reviewed.

DEFINITIONS

Hazardous Chemical - any chemical which is a physical hazard or a health hazard.

Hazardous material - a substance or material that is capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and has designated as hazardous under section 5103 of Federal hazardous materials transportation law (49 USC 5103). OSHA requires manufacturers of hazardous materials to develop material safety data sheets (MSDSs) for the materials.

Hazardous waste - any waste or combination of waste which because of its quantity, quality, concentration, physical, chemical, or infectious characteristics could cause or significantly contribute to adverse effects in the health and safety of humans or the environment if improperly managed.

Universal Waste - any of the following hazardous wastes as described in 40 CFR 273.2 - 273.5: batteries, pesticides, mercury-containing equipment, and fluorescent lamps.

SCOPE

This EnviroFact Sheet is limited to a summary of the major environmental health and safety training requirements applicable to NPS personnel. For a comprehensive list of training requirements, authorities, available training resources, etc., please go to:

http://pfmd1.nps.gov/EMP/hazmat/EMP_LIB/Documents/training/Training%20matrix_Oct%202004.xls

HAZARDOUS MATERIALS TRAINING

The Hazard Communication (HAZCOM) Standard (29 CFR 1910.1200) requires that parks prepare a written HAZCOM program that includes training for all personnel who handle hazardous chemicals. HAZCOM training must cover release detection, physical and health hazards, protective measures, material labeling, and Material Safety Data Sheet information for hazardous chemicals to be encountered during normal or emergency conditions. All personnel are required to undergo training upon employment and when a new chemical or hazard is introduced. Parks should perform HAZCOM refresher training at least annually.

The OSHA regulations at 29 CFR 1910.120 require parks to prepare and implement an Emergency Response (ER) plan if the park intends to perform emergency response actions for hazardous materials releases. One key element of ER Plan implementation is the provision of training for personnel involved in ER activities. The three different levels of training outlined in this regulation include:

First Responder Awareness Level (Level I) - All personnel who are likely to witness or discover a hazardous substance release and whose actions would be limited to initiating an emergency response sequence by notifying the proper authorities. The training requirement is 4 to 8 hours.

First Responder Operations Level (Level II) - All personnel who respond to releases or potential releases of hazardous substances as part of the initial response for the purpose of protecting nearby persons, property, or the environment from the effects of the release. Actions are limited to defensive measures to stop the release. The training requirement is 24 hours with an 8-hour annual refresher session.

Hazardous Materials Technician (Level III) - All personnel who respond for the purpose of stopping the release in a more aggressive way, such as by plugging or patching containers. The personnel can also participate in the cleanup of released materials. The training requirement is 40 hours with an 8-hour annual refresher session.

All training must be performed by an instructor who has completed a train-the-trainer course or who is able to demonstrate that he/she has the training or credentials necessary to competently conduct the training.

Parks that elect not to perform hazardous materials emergency response activities may prepare and implement an Emergency Action Plan in accordance with 29 CFR 1910.38 in lieu of an ER Plan. All personnel must be trained on evacuation procedures in the event of an emergency.

RESPIRATORY PROTECTION TRAINING

OSHA respiratory protection regulations that require certain park personnel to use respiratory protection also require that parks provide training to these personnel and their supervisors on the content of the Park's Respiratory Protection Program (RPP), the OSHA respiratory protection standard, and their responsibilities under the Program. Training must include instruction on respiratory hazards to which personnel may be exposed during routine and emergency situations and proper use and maintenance of respirators.

For voluntary users of respiratory protection, parks must convey the information in Appendix D of 29 CFR 1910.134 ("Information for Personnel Using Respirators When Not Required Under the Standard"). In addition, parks should provide training on cleaning, storing, and maintaining respirators (unless only filtering facepieces are being used) as a best management practice.

FOR MORE INFO...

EnviroFact Sheets

- *Hazard Communication (HAZCOM) (SY-1)*
- *Managing Hazardous Waste: Planning for an Emergency (HW-5)*
- *Managing Universal Waste (SW-12)*
- *Respiratory Protection (SY-4)*
- *Spill Prevention, Control and Countermeasure (SPCC) Planning (G-8)*

HAZARDOUS AND UNIVERSAL WASTE MANAGEMENT TRAINING

All parks that are Large Quantity Generators (LQG) of hazardous waste are required to comply with the Preparedness and Prevention and Contingency Plan and Emergency Procedures training requirements under 40 CFR 265 (RCRA contingency training). LQG park personnel must complete classroom or on-the-job training on hazardous waste management that, at a minimum, ensures that they can respond effectively to hazardous waste emergencies. The training program must be directed by an individual who has been trained in hazardous waste management procedures. An annual review of the initial training is required.

Small Quantity Generators (SQG) must ensure that all park personnel are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during both normal operations and emergencies. **(NOTE: NPS policy is that Conditionally Exempt Small Quantity Generator parks meet all SQG requirements, including training.)**

Under 40 CFR 273.16, park personnel collecting, storing, handling, or disposing of Universal Waste (as defined in 40 CFR 273) should receive training on proper waste handling and emergency procedures relative to their responsibilities during both normal facility operations and emergencies.

OIL POLLUTION PREVENTION TRAINING

Parks that store petroleum in quantities exceeding the thresholds outlined in 40 CFR 112 are required periodically instruct personnel in the operation and maintenance of equipment to prevent discharges of oil. Training requirements must be identified in the park's Spill Prevention, Control and Countermeasure (SPCC) Plan.

HAZARDOUS MATERIALS TRANSPORTATION TRAINING

DOT regulations at 49 CFR 173.1 require all parks involved in the transportation of hazardous materials or the offering of hazardous materials for disposal to perform personnel training as outlined in the regulations. These training requirements address proper hazardous materials packaging and labeling.

