

Guidance for Oil Spill Responder Training

Training Marine Oil Spill Response Workers Under OSHA's Hazardous Waste Operations and Emergency Response Standard



U.S. Department of Labor
Occupational Safety and Health Administration

OSHA 3172
2001



Oil Definition under National Contingency Plan

- Petroleum
- Fuel Oil
- Sludge
- Oil refuse
- Oil mixed with Waste except dirt or rock

What level of Training

- Based upon highest level of Assignment Responsibility
- Where in proximity of spill
- What is the employee tasked to do

Two Phases of Response Action Under HAZWOPER

- Can be both at the same time or separate
- Emergency Response (q)
 - Oil and Associated Airborne and Surface Contamination Hazards – real or potential
 - On water and underwater operations
 - Oil still in containment boom
- Post-Emergency Response (q)(11)
 - Stranded on the beach
 - Shore line clean up* Re-released
 - Oil is stabilized

When does HAZWOPER not apply

- Spill does not present H & S hazard to employees
- Can be absorbed or cleaned-up by employees in the vicinity
- Does not have the potential to become an emergency

Volunteers

- Not covered by Federal OSHA 29 CFR 1910.120
- Usually Covered by STATE OSHA
- Covered by EPA 40-CFR 311
Compensated and non-compensated workers

What Exposure Guidance to use

- OSHA
- NIOSH
- ACGIH (American Conference of Governmental Industrial Hygienists)

Potential Contaminates

- Benzene
- Benzo (a) pyrene
- Carbon Dioxide
- Carbon Monoxide
- Ethyl Benzene
- Hydrogen Sulfide
- Methyl tert-butyl ether
- Sulfuric Acid
- Toluene
- Xylenes

Additional Hazards*

- Biological
- Drowning
- Noise
- Heavy Equipment/Vehicular traffic
- ATVs
- Unguarded Equipment
- Wild Animals

Additional Hazards*

- Cranes
- Welding and Cutting
- Dispersants
- Degreasers
- Underwater Diving

Response Levels based on Training

- Incident Commander* - Initial Response
- Awareness ----- Defensive Response
- Operations ----- Defensive Response
- Technician ----- Offensive Response
- Special Skills ----- Logistical Support
- Specialist ----- Technical Support
- Incident Commander*—Managing Resp.

Emergency Response Action

		Box 2	Box 1	Box 5	Box 6
		What action will the worker be assigned in the emergency response?			
Box 3	Box 4				
Incident Commander On-Scene Coordinators Supervisors	Active Response: Taking action at the source Stopping the release	Defensive Response: Containing at a distance people, property, and environment at a safe distance	Initiate Response Only: Notifying Authorities	Skilled Support: Usually not a response team employee Immediate, short-term, intervention only.	Specialist Employee: Providing technical assistance to individual in charge
Incident Commander 1910.120(q)(6)(v) 24 hours + Demonstrated Competencies + Annual Refresher Table 2: Incident Commander	Hazardous Materials Technician or Specialist 1910.120(q)(6)(iii) or (v) 24 hours + Demonstrated Competencies + Annual Refresher Table 2: Active Response	First-Responder Operations Level 1910.120(q)(6)(ii) 8 hours + Demonstrated Competencies + Annual Refresher Table 2: Defensive Response	First-Responder Awareness Level 1910.120(q)(6)(i) Hours Sufficient to Demonstrated Competencies + Annual Refresher Table 2: Initiate Response	Skilled Support Personnel 1910.120(q)(4) Spill Site Briefing Only Table 2: Skilled Support	Specialist Employee 1910.120(q)(5) Demonstrate Competencies in Specialization Annually Table 2: Specialist Employee
		Will the worker participate in post-emergency response cleanup?		No -->	No further training required

Yes

What will the worker be assigned during the Emergency Response

<p>Box 1 Initiate Response Only: Notifying Authorities</p>	<p>Box 2 Defensive Response: Containing at a distance people, property, and environment at a safe distance</p>
<p>First-Responder Awareness Level 1910.120(q)(6)(i)</p> <hr/> <p>(minimum of 4 hours)</p>	<p>First-Responder Operations Level 1910.120(q)(6)(ii)</p> <hr/> <p>8 hours</p>
<p>Hours enough to Demonstrated Competencies Plus Annual Refresher</p>	<p>Demonstrated Competencies Plus Annual Refresher</p>
<p>Table 2: Guidance for post-emergency Activity</p>	<p>Table 2: Guidance for post-emergency Activity</p>



What will the worker be assigned during the Emergency Response

Box 3 Incident Commander, On-Scene Coordinators, Supervisors	Box 4 Active Response: Taking action at the source Stopping the release
<p style="text-align: center;"> Incident Commander <u>29 CFR 1910.120(q)(6)(v)</u> 24-hours of Training Plus </p>	<p style="text-align: center;"> Hazardous Materials Technician or Specialist <u>29 CFR 1910.120(q)(6)(iii) or (v)</u> 24 hours of Training Plus </p>
<p style="text-align: center;"> Demonstrated Competencies Plus Annual Refresher </p>	<p style="text-align: center;"> Demonstrated Competencies Plus Annual Refresher </p>
<p style="text-align: center;"> Table 2: Guidance for post-emergency Activity </p>	<p style="text-align: center;"> Table 2: Guidance for post-emergency Activity </p>



What will the worker be assigned during the Emergency Response

<p>Box 5 Skilled Support: Usually not a response team employee Immediate, short-term, intervention only.</p>	<p>Box 6 Specialist Employee: Providing technical assistance to individual in charge</p>
<p>Skilled Support Personnel 29 CFR 1910.120(q)(4)</p> <hr/>	<p>Specialist Employee 29 CFR 1910.120(q)(5)</p> <hr/>
<p>Demonstrated Competencies</p>	<p>Demonstrated Competencies Plus Annual Refresher</p>
<p>Table 2: Guidance for post-emergency Activity</p>	<p>Table 2: Guidance for post-emergency Activity</p>



Post-Emergency Action

Will the worker be exposed to oil or other hazardous substances? Yes	No -->	Spill site briefing. Training under other OSHA standards may be required (see Appendix A)
Is the worker's experience and/or training equivalent to the appropriate training below?*	Yes -->	No further training required; employer must document equivalency per 1910.120 (e)(9) Site-specific training is required
Will the worker face ANY of the following: Exposures above Permissible/Published Limits? Respirators Needed? Potential for Emergency to Develop?		
	No	
	Yes	
	Manager?	
No	Yes	
General Spill Site Worker 1910.120(e)(3)(i)	Managers/ Supervisors 1910.120(e)(4)	
<ul style="list-style-type: none"> 40 hours initial 24 hours field 8 hours annual refresher Table 3: Moderate-High Exposure	<ul style="list-style-type: none"> 40 hours initial 24 hours field 8 hours manager 8 hours annual refresher Table 3: Moderate-High Exposure	
	No	
	Manager?	
No	Yes	
Workers Unlikely to Be Exposed Above Limits** 1910.120(e)(3)(i), (e)(3)(iii)	Managers/ Supervisors of Workers Unlikely to Be Exposed Above Limits 1910.120(e)(4)	
<ul style="list-style-type: none"> 24 hours initial** 8 hours field 8 hours annual refresher Table 3: Low Exposure	<ul style="list-style-type: none"> 24 hours initial 8 hours field 8 hours manager 8 hours annual refresher Table 3: Low Exposure	

ON-SCENE COORDINATOR

- 1) Know and be able to implement the employer's incident command system.
- 2) Know how to implement the employer's emergency response plan.
- 3) Know and understand the hazards and risks associated with employees working in personal protective clothing.
- 4) Know how to implement the local emergency response plan.
- 5) Know the state emergency response plan and the Federal Regional Response Team.
- 6) Know and understand the importance of decontamination procedures.

ACTIVE RESPONSE

- 7) Know how to implement the employer's emergency response plan.
- 8) Know how to use field survey instruments and equipment to classify, identify, and verify known and unknown materials.
- 9) Be able to function within an assigned role in the Incident Command System.
- 10) Know how to select and use proper specialized personal protective equipment provided to the hazardous materials technician.

ACTIVE RESPONSE

- 11) Understand and be able to apply hazard and risk assessment techniques.
- 12) Be able to perform advanced control, containment, and/or confinement operations within the capabilities of the resources and available personal protective equipment.
- 13) Understand and implement decontamination procedures.
- 14) Understand termination procedures.
- 15) Understand terminology and behavior of chemicals and their toxic effects.

Active Response (cont'd)

- 16) Know how to use advanced survey instruments and equipment to classify, identify, and verify known and unknown materials.
- 17) Understand in-depth hazard and risk techniques.
- 18) Be able to determine and implement decontamination procedures.
- 19) Know how to implement the local emergency response plan.
- 20) Know the state emergency response plan.

Active Response (cont'd)

- 21) Be able to develop a site safety and control plan.
- 22) Understand chemical, radiological, and toxicological terminology and behavior.
- 23) Be able to select and use proper specialized chemical personal protective equipment provided to the hazardous materials specialist.
- 24) Be able to perform specialized control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available.

Questions?

