Guidance #1: What is the purpose of this guidance document?

The IUOE National Training Fund (NTF) is a National Institute of Environmental Health Sciences (NIEHS) grantee and must follow the NIEHS Minimum Health and Safety Training Criteria guidelines. A copy of the Minimum Criteria can be viewed by visiting www.iuoehazmat.org, choose the Trainers’ Page tab, and click on the NIEHS Minimum Criteria tab on the left side of the page. These criteria are applicable to all NIEHS training grant awardees conducting 29 CFR 1910.120 HAZWOPER-based training, 1910.120-supporting training, and all-hazards prevention, preparedness, and response training for which the grantee is funded by the NIEHS. The purpose of this guidance document is to establish minimum health and safety training criteria for hands-on during HAZWOPER courses supported by NIEHS which includes:

- HAZWOPER General Site Worker 40-hour,
- HAZWOPER Occasional Worker 24-hour, and
- HAZWOPER Annual Refresher 8-hour.

Guidance #2: What is the definition of “hands-on” training?

The NTF defines “hands-on” training as an educational tool that allows the trainee to not only hear what tasks need to be completed, but gives the trainee the opportunity to perform the tasks during the class with a trainer available to provide guidance; or active personal participation in an activity.

Guidance #3: HAZWOPER General Site Worker 40-hour Hands-on Requirements

Section 11.1.2.1 of the Minimum Criteria mandates that “The initial off-site general site worker training course shall be a minimum of 40 training hours in duration, shall devote a minimum of one-third of the training hours to hands-on training, and …”. The NTF interprets this as
stating the 40-hour General Site Worker course will include a minimum of 13.3 hours of hands-on training. Instructors should keep in mind that 29 CFR 1910.120 requires students to demonstrate proficiency with PPE including respiratory protection. Respiratory protection and PPE will be included in hands-on training in all 40-hour HAZWOPER General Site Worker courses and instructors may choose from additional topics in Table 1 below to satisfy the minimum hours for hands-on training.

Table 1. Topics recommended for hands-on components based on the NIEHS Minimum Criteria.

<table>
<thead>
<tr>
<th>40-hour topics</th>
<th>Recommendations for hands-on components</th>
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| Safety hazards and safe work practices and procedures                        | • Hazard recognition exercise  
• Lock out/Tag out kits  
• Training kits, e.g. ladders, electrical                                                                                                                                  |
| Material handling procedures, precautions and applications                   | • IUOE local union equipment exercise  
• Barrels and over-packs                                                                                                                                                            |
| Sampling procedures, precautions, and applications                          | • 4-Gas monitor exercise  
• IH equipment, e.g. radiation, low flow pumps, PID, noise                                                                                                                                                                      |
| Sample collection, monitoring, handling, packaging, and shipment             | • Chain of custody sheets for collected samples                                                                                                                                                                                         |
| Respiratory protection                                                       | • Students demonstrate proficiency with respiratory protection  
• Instructors demonstrate various types of respiratory protection  
• APR  
• SAR-E  
• SCBA  
• Different models and manufacturers                                                                                                                                                                                                     |
| PPE ensembles                                                                | • Students demonstrate proficiency with PPE  
• Instructors demonstrate various types of PPE  
• Dress out                                                                                                                                                                                                                                    |
| Decontamination                                                              | • Set up decontamination line  
• Students complete decontamination process in the decon line                                                                                                                                                                              |
| Monitoring requirements, monitoring instruments, their limitations and demonstration of competency with instruments trainees may be required to use | • Instructors demonstrate various types of instruments  
• Students practice using instruments  
• Radiation  
• Noise  
• Colorimetric tubes  
• Air Monitoring                                                                                                                                                                                                                     |
Guidance #4: HAZWOPER Occasional Worker 24-hour Hands-on Requirements

Section 11.1.2.2 of the Minimum Criteria mandates a minimum of six (6) hours of hands-on or demonstration activities. Occasional workers, as defined in the HAZWOPER standard, are on site only infrequently and then only for a specific, limited task. The standard further premises that such workers are not exposed in excess of the applicable exposure limits and are not, therefore, required to wear respiratory protection. Initial off-site training of 24 hours duration and one day on-site supervised training is required. The OSHA standard provides no guidance as to the competencies required for such workers. The standard does state, however, that workers who upgrade to full-time workers or who are subsequently required to wear respirators shall be provided an additional 16 hours of training and two days of on-site supervision.

The 24-hour Occasional Worker curriculum should address the following subject areas for which learning objectives sufficient to permit demonstration of competencies must be developed:

- Health hazards
- Safety hazards
- Confined spaces: awareness
- Emergency response: overview
- Respiratory protection: awareness
- PPE: awareness
- Decon: awareness
- Rights and responsibilities
- Medical surveillance
- Site safety and health plans
- Hazard communication standard
- Minimum of six hours of hands-on or demonstration activities

Guidance #5: HAZWOPER Annual Refresher 8-hour Hands-on Requirements

Section 11.1.3 of the Minimum Criteria mandates that “General site workers and supervisors must have a minimum of eight hours of annual refresher training” and “A minimum of two (2) hours of hands-on, or demonstration activities, is recommended.” The course content shall include, at a minimum, a core curriculum established for the 8-hour refresher training required by 1910.120(e)(8), based upon the initial general site worker course. Individuals developing the refresher course curriculum should:

- Review and retrain on relevant topics covered in the 40-hour course using reports by the trainees of their relevant experiences during the preceding year to facilitate the review. Relevant topics may include essential safety and health aspects such as PPE, respiratory protection, decontamination, site safety and health plans, and topics identified in lessons learned reports. These topics may also be extrapolated from OSHA standards interpretations, national statistics, journal articles and/or major incidents that may apply by the instructor.
- Update materials covered in the initial course, including new technologies used in hazardous waste clean-up, task changes, and subject matter that applies to increased worker protection.
• Review changes to pertinent provisions of RCRA, SARA, and the Toxic Substances Control Act (TSCA) and to pertinent OSHA standards. The review may be presented alone or integrated into other subject matter. If the latter approach is taken, workers must be advised of the provision update.

• Introduce additional subject areas including topics that affect worker health and safety that may not have been covered in the initial 40-hour training program, such as blood-borne pathogens and emerging all-hazards issues.

• Provide **hands-on opportunities for new developments in personal protective equipment**, such as new or altered donning/doffing procedures for respirators and **new decontamination procedures for protective garments**.

• Review newly-developed monitoring equipment including lecture/**demonstration and hands-on training** as appropriate. The operating principles, capabilities, and limitations should be addressed.

(Source NIEHS *Minimum Criteria*, 2006)