

APPENDIX B

EPA ORDER 1440.2 HEALTH AND SAFETY REQUIREMENTS FOR EMPLOYEES ENGAGED IN FIELD ACTIVITIES

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PROTECTIVE SERVICES - SAFETY

HEALTH AND SAFETY REQUIREMENTS FOR EMPLOYEES ENGAGED
IN FIELD ACTIVITIES

1. PURPOSE. This Order establishes policy, responsibilities, and mandatory requirements for occupational health and safety training and certification, and occupational medical monitoring of Agency employees engaged in field activities.

2. DEFINITIONS.

a. The term "field activities" as used in this Order means EPA program activities that are conducted by EPA employees outside of EPA administered facilities. These activities include environmental and pesticides sampling, inspection of water and wastewater treatment plants, and hazardous material spills and waste site investigations, inspections, and sampling.

b. The term "health and safety training" means scheduled, formal or informal training courses, approved and sponsored by EPA and conducted by EPA or its contracted agents which is designed to develop, improve and upgrade the health and safety knowledge of EPA employees involved in field activities.

c. The term "occupational medical monitoring" means surveillance over the health status of employees by means of periodic medical examinations or screening in accordance with the Agency's Occupational Medical Monitoring guidelines.

d. The term "certification" as used in this Order means that the employee has successfully completed the minimum classroom and field training requirements for the specified level of training and the Agency has issued a certificate attesting that the employee met these requirements.

3. REFERENCES.

a. 29 CFR 1910, Parts 16, 94, 96, 106, 109, 111, 134, 151, 1000, Occupational Health and Safety Standards.

b. Executive Order 12196, Section 1-201, Sec. (k), Occupational Health and Safety Programs for Federal Employees.

c. 29 CFR 1960.59(a), Occupational Safety and Health for the Federal Employee.

d. EPA Occupational Health and Safety Manual, Chapter 7(1).

e. EPA Training and Development Manual, Chapter 3, Par 7(b).

- f. Occupational Health and Safety Act of 1971, P.L. 91-596, Sec.6.
 - g. EPA Order on Respiratory Protection (Proposed).
 - h. 49 CFR, Parts 100-177, Transportation of Hazardous Materials.
 - i. EPA Order 1000.18, Transportation of Hazardous Materials.
 - j. EPA Order 3100.1, Change 1, Uniforms, Protective Clothing, and Protective Equipment.
4. BACKGROUND. Field activities are a critical part of most EPA programs. These activities range from routine environmental reconnaissance sampling, inspections, and monitoring, to entering and working in environments with known and unknown hazards. Since protection can not be engineered into the field working situation, the protection of personnel engaged in field activities involves training employees in safe operational procedures and the proper use of appropriate personal protective clothing and equipment.
5. APPLICABILITY. This Order applies to all EPA organizational units which have employees engaged in field activities.
6. POLICY. It is the policy of the Environmental Protection Agency to carry out its field activities in a manner that assures the protection of its employees.
7. RESPONSIBILITIES.
- a. Assistant Administrators, Regional Administrators, Deputy Assistant Administrators, Laboratory Directors, and Division Directors. These officials are responsible within their jurisdictions for implementing the provisions of this Order and for budgeting the necessary funds for employee training and certification, personal protective clothing and equipment, and occupational medical monitoring programs.
 - b. Supervisors. Supervisors are responsible for complying with the requirements of this Order for employee training and certification, and occupational medical monitoring programs. They will identify those employees who require training and certification, and occupational medical monitoring, and assure they receive it to comply with the provisions of this Order and will insure these requirements are properly contained in position descriptions and job postings.
 - c. Employees. Employees are responsible for making known upon request from their supervisors the extent of their individual occupational health and safety training and the history of their occupational medical monitoring participation. Employees should notify their supervisor of any hazardous work situation and make suggestions for corrective measures. Employees are responsible for applying the knowledge, skills, and techniques acquired through training in a manner that will help assure their health and safety and that of fellow workers.
 - d. Occupational Health and Safety Designees. The Occupational Health and Safety Designees are responsible for identifying program areas that require training and certification, and occupational medical monitoring; recommending or providing training and certification resources to meet the requirements of this Order; and maintaining records of persons receiving training and certification.

e. Office of Occupational Health and Safety. The Director, Office of Occupational Health and Safety is responsible for establishing policy and requirements for adequate training and certification programs for field activities, developing and maintaining an occupational medical monitoring program, approving health and safety training and certification programs for employees involved in field activities, and for evaluating the results of these training and certification programs.

8. OBJECTIVES.

a. Training and Certification. The objective of the health and safety training and certification programs for employees involved in field activities are:

- (1) To assure that EPA employees are aware of the potential hazards they may encounter during the performance of field activities;
- (2) To provide the knowledge and skills necessary to perform the work with the least possible risk to personal health and safety;
- (3) To assure that Agency program goals are accomplished in as safe and healthful manner as feasible; and
- (4) To assure that EPA employees can safely disengage themselves from an actual hazardous situation which may occur during a field activity.

b. Occupational Medical Monitoring. The objectives of the occupational Medical Monitoring program are:

- (1) To detect any adverse effects of occupational exposure on the employees health and to initiate prompt corrective actions when indicated; and
- (2) To assure that employees assigned arduous or physically taxing jobs or jobs requiring unique skills are able to perform those jobs without impairing their health and safety or the health and safety of others.

9. TRAINING AND CERTIFICATION REQUIREMENTS. Employees shall not be permitted to engage in routine field activities until they have been trained and certified to a level commensurate with the degree of anticipated hazards.

a. Basic Level. All employees shall be provided a minimum of 24 hours of health and safety training prior to their becoming involved in normal, routine field activities. The training shall include but not be limited to classroom instruction in all the following subject areas:

- (1) Employee Rights and Responsibilities;
- (2) Nature of Anticipated Hazards;
- (3) Emergency Help and Self-Rescue;
- (4) Vehicles - Mandatory Rules and Regulations;
- (5) Safe Use of Field Equipment;
- (6) Use, Handling, Storage, and Transportation of Hazardous Materials;
- (7) Personal Protective Equipment and Clothing, Use and Care; and
- (8) Safe Sampling Techniques.

In addition to classroom instruction, the employee shall accompany an employee experienced in field activities and perform actual field tasks for a minimum of three days within a period of three months after classroom instruction. Employees satisfactorily completing these requirements will receive certification at the Basic Level of training from the Occupational Health and Safety Designee at the Reporting Unit.

b. Intermediate Level. All inexperienced employees who are to work with experienced employees in uncontrolled hazardous waste and hazardous spills sites investigators or employees engaged in other activities which at a later date are determined by the Director, Office of Occupational Health and Safety, to present unique hazards requiring additional training, shall be provided a minimum of 8 hours of additional health and safety training. This training shall include (in addition to the Basic Level requirements) but not be limited to the following subject matter:

- (1) Site surveillance, observation, and safety plan development;
- (2) Use and decontamination of totally enclosed protective clothing and equipment;
- (3) Use of field test equipment for radioactivity, explosivity, and other measurements; and
- (4) Topics specific to other identified activities.

In addition to classroom instruction, the employee shall accompany another employee experienced in hazardous waste and spill site investigations and/or cleanup operations and perform actual field tasks for a minimum of three days within a three month period, following classroom instruction. The employee should also be able to provide on-the-job training and instructions to inexperienced employees during normal routine field activities (as required above). Employees satisfactorily completing these requirements will be certified at the Intermediate Level by the Occupational Health and Safety Designee at the Reporting Unit.

c. Advanced Level. All employees who manage uncontrolled hazardous waste site and spill site monitoring, sampling, investigations, and cleanup operations shall be provided a minimum of 8 hours additional health and safety training. The classroom training shall include but not be limited to (in addition to the Basic and Intermediate Level requirements), instruction in the following subject areas:

- (1) Management of restricted and safe zones;
- (2) Rules of Handling the Press and VIP's; and
- (3) Safe Use of Specialized Sampling Equipment.

In addition to classroom instruction, the employee shall accompany another employee with experience in managing hazardous waste and spill site investigations or cleanup operations and perform actual field tasks for a minimum of three days within a period of three months after classroom instruction. After satisfactorily completing these requirements, employees will receive Advanced Level certification from the Occupational Health and Safety Designee at the Reporting Unit.

d. General.

(1) An employee may receive certification at the next higher level by completing only the additional training requirements if certified at the next lower level within the previous one-year period.

(2) The Director, Office of Occupational Health and Safety, may certify employees based on an evaluation of previous training, education, and experience. Recommendations for this type certification should be made to the Director by the Occupational Health and Safety Designee at the Reporting Unit.

10. FREQUENCY OF TRAINING. Employees at the Basic, Intermediate, and Advanced Levels shall complete a minimum of 8 hours of refresher classroom instruction annually consisting of a review of all subject areas to maintain their certification. In addition to the classroom instruction, employees shall have demonstrated by having performed actual field tasks that they have sufficient practical experience to perform their assigned duties in a safe and healthful manner.

11. RECORD OF TRAINING.

- a. A record of the level of training and certification shall be maintained in the employee's official personnel file.
- b. The Occupational Health and Safety Designee shall maintain a roster of employee training and certification so that a schedule of annual training can be established.
- c. The Occupational Health and Safety Designee shall issue a certificate to the employee showing the level of training and certification.

12. OCCUPATIONAL MEDICAL MONITORING REQUIREMENTS. All employees routinely engaged in field activities which present the probability of exposure to hazardous or toxic substances, which are arduous or physically taxing, or which require the use of respiratory protective equipment shall be included in the Agency's Occupational Medical Monitoring Program. Employees should not be permitted to engage in field activities unless they have undergone a baseline medical examination (as defined in the Agency's Occupational Medical Monitoring Guidelines), which will show physical fitness and provide a base to measure any adverse effects their activities may have on these individuals.

13. SAVING PROVISIONS. Changes in the Act, Executive Order, or EPA and OSHA standards and guidelines which occur after the effective date of this Order will automatically come under the purview of this Order on the effective date of the change.

Full implementation of this Order shall be within one year of its effective date

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