



COMDTINST 6260.31B
DEC 20 2010

COMMANDANT INSTRUCTION 6260.31B

Subj: SAFETY AND HEALTH TRAINING FOR EMERGENCY RESPONSE OPERATIONS

- Ref: (a) Hazardous Waste Operations and Emergency Response, Title 29 CFR Part 1910.120(q)
 (b) Marine Safety Manual, Volume IX, Marine Environmental Protection, COMDTINST 16000.14 (series)
 (c) Weapons of Mass Destruction and Catastrophic Hazardous Materials Releases, COMDTINST M3400.3 (series)
 (d) Occupational Safety and Health Programs for Federal Employees, E.O. 12196
 (e) Alignment with the National Incident Management System and National Response Plan, COMDTINST 16000.27
 (f) Information and Life Cycle Management Manual, COMDTINST M5212.12 (series)
 (g) Basic Program Elements for Federal Employee Occupational Safety and Health Program and Related Matters, Title 29 CFR Part 1960
 (h) Safety and Environmental Health Manual, COMDTINST M5100.47 (series)
 (i) Training Marine Oil Spill Response Workers Under OSHA's Hazardous Waste Operations and Emergency Response Standard, OSHA Booklet 3172 (2001)

1. PURPOSE. The purpose of this Instruction is to update the safety and health policies and training requirements for emergency responders as required under references (a) and (b) which require Emergency Response training for first responders to oil and hazardous substance incidents, and reference (c), which requires personnel to have additional Emergency Response training specifically focused on potential incidents involving Weapons of Mass Destruction (WMD). This Instruction is not intended for personnel (e.g., National Strike Force) involved in post-emergency response operations.

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	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z
A	1	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1						
B	5	8	10	1	1	1		1			1	1	1	2			1	1								
C	1	1		1	1			1	1		2		1	2		1					1		1		1	1
D	1	1		1															1							
E	1			1						1	1	1		1	1			1	1							
F																										
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H																										

NON-STANDARD DISTRIBUTION: None

2. ACTION. All Coast Guard unit commanders, commanding officers, officers-in-charge deputy/assistant commandants, and chiefs of headquarters staff elements shall comply with provisions of this Instruction. Internet release authorized.
3. DIRECTIVES AFFECTED. Safety and Health Training for Emergency Response Operations, COMDTINST 6260.31A, is cancelled.
4. DISCUSSION.
 - a. Background. Coast Guard personnel often work in environments where they are likely to witness an oil spill or a release of hazardous substances (either intentional, such as a WMD, or unintentional, such as an overturned rail car) into the navigable waters of the United States. Likewise, the majority of Coast Guard personnel (Active Duty, Reserve, Auxiliarists and Civilians) are expected to take some level of action should they witness or come across a potential or actual incident as public and environmental protection are core Coast Guard missions. As directed under reference (d), and as outlined in reference (a), all Coast Guard personnel who are likely to be involved at any level in an emergency response must be trained by their commands to the level of action they are expected to take. This level of action is highly dependent on the member's assigned unit and position (e.g., an MST1 assigned to the Incident Management Division at a Sector would likely be expected to have more responsibilities and training than a YN1 at that same unit). Personnel who are likely to witness an event but are not expected to take any defensive actions, such as booming off an oil spill, are normally trained to the First Responder Awareness Level, the minimum level of training under this instruction. Personnel who are not likely to witness an event and are not expected to take any action should they witness one (e.g., administrative/staff personnel) are not required to have any level of training under this instruction. Conversely, personnel who may be positioned to take defensive actions will be trained to the First Responder Operations Level (which includes the Awareness Level). The safety and health training requirements – the same ones employed for Coast Guard emergency responders – have existed since 1990 and are contained in the Occupational Safety and Health Administration's (OSHA) regulation (29 CFR 1910.120) titled Hazardous Waste Operations and Emergency Response (HazWOpER). Detailed background information regarding OSHA requirements and the Coast Guard's approach to meeting them is included in enclosure (1); a general training matrix is included in enclosure (2).
 - b. Applicability. This Instruction applies to all Coast Guard Active Duty, Reserve, Civilian and Auxiliary personnel engaged in or potentially engaged in emergency response (with the exception of the National Strike Force and expeditionary forces under OPCON of the Combatant Commander). These exempted units shall promulgate and maintain mission-specific safety and health training requirements for their own personnel, or, as in the case of the expeditionary forces, shall adhere to the guidelines promulgated by the Combatant Commander's operational plans. Additionally, this Instruction does not apply to personnel working at Treatment, Storage, or Disposal Facilities who are regulated under 29 CFR 1910.120(p), nor does it apply to workers conducting "post-emergency response," which is performed after the immediate threat of the release or spill has been stabilized and clean up has begun (29 CFR 1910.120(e)). The provisions of this

Instruction do not prohibit “uniquely military operations;” however, they do require safety and health training for hazards likely or expected to be encountered during mission operations.

c. Definitions.

- (1) First Responder Awareness (FRA) Level. First responders at the awareness level are individuals who are likely to witness or discover an oil spill or hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the spill/release. They would take **no further action** beyond notifying the authorities. Cutters (not including those capable of oil skimming operations) and air stations are examples of units that would likely require this level of training for their personnel (see enclosure (2) for additional examples).
- (2) First Responder Operations (FRO) Level. First responders at the operations level are individuals who respond to an oil spill or hazardous substances release or a potential spill/release as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the spill/release. They are trained to respond in a defensive fashion without actually trying to stop the release (e.g., diking, ditching, booming, or other similar activities that can be done without the need of chemical protective clothing). Their function is to contain the spill/release from a safe distance, keep it from spreading, and prevent exposures. Examples of units where this level of training will likely be required include Sectors, cutters capable of skimming operations, and DOG units.
- (3) On-Scene Incident Commander (IC). Incident commanders are those individuals who will be expected to assume control of the incident beyond the first responder awareness level.
- (4) Hazardous Materials Technician. Hazardous material technicians are individuals who respond to spills/releases or potential spills/releases for the purpose of stopping the spill/release. They assume a more aggressive role than first responders at the operations level in that they will approach the point of spill/release in order to plug, patch or otherwise stop the spill/release of oil or a hazardous substance.
- (5) Hazardous Materials Specialist. Hazardous material specialists are individuals who respond with and provide support to hazardous materials technicians. Their duties parallel those of the hazardous materials technician; however, their duties require a more directed or specific knowledge of the various substances they may be called upon to contain.
- (6) Skilled Support Personnel. Skilled support personnel are individuals, not necessarily an employer’s own employees, who are skilled in the operation of certain equipment, such as crane and hoisting equipment, and are needed temporarily for the response to perform immediate emergency support work that cannot reasonably be performed in a

timely fashion by an employer's own employees. Skilled support personnel may or may not be exposed to the hazards at an emergency response scene.

- (7) Post-Emergency Response Workers. These individuals perform cleanup operations after the hazardous substance(s) has been controlled. *If post-emergency response is performed by employees who were part of the initial emergency response, it is considered to be part of the initial response and not post-emergency response.* However, if workers separate from the group providing initial response perform the cleanup operation or join the initial responders in the post-emergency response phase, then they would be considered to be performing post-emergency response and subject to the training requirements contained in 29 CFR 1910.120(e) .
- d. Requirements for each Training Level. Reference (a) specifies various training levels for the emergency response phase that differ primarily by two factors: required training time and competencies. The time requirements are minimums; many Coast Guard unit personnel will require additional time to meet the competencies and address fully the risks associated with their Area of Responsibility (AOR) or mission set. The applicable training levels for Coast Guard units are outlined below; post-emergency training requirements are also included for informational purposes. Enclosures (3) and (4) provide specific time and competency requirements for each training level.
- (1) First Responder Awareness (FRA). Training for first responders at the awareness level must be sufficient to fulfill the OSHA required competencies (see competencies numbered 31-36 in enclosure (4)) for the expected hazards. The determination of "sufficient" is to be made by the trainer in consult with his/her Safety and Environmental Health Officer (SEHO) who can assist in determining what incidents (and, therefore, hazards) would likely occur in their AOR. All operational Coast Guard personnel will need to be trained, at a minimum, to this level (see enclosure (2)). The FRA training is a prerequisite to all other emergency response operations training. It has already been incorporated into the FRO curriculum.
- (2) First Responder Operations (FRO). First responders at the operations level shall have received at least eight (8) hours of training to fulfill the required OSHA competencies (see competencies numbered 25-30 in enclosure (4)) in addition to the FRA competencies which are a prerequisite to this level. The Coast Guard's FRO curriculum is based on the principles of Operational Risk Management (ORM). All Coast Guard personnel in positions that may require them to take defensive actions during an incident will need to be trained to this level (see enclosure (2)). The FRA curriculum and competencies may be incorporated into the eight hour FRO training program so that a separate FRA training session is not necessary.
- (3) On-Scene Incident Commander (IC). This level requires that IC's have a minimum of 24 hours of training equal to the first responder operations level, and that they fulfill the additional competencies covering emergency response plans and the Incident Command System (ICS) as per reference (e) (see competencies numbered 1-6 in enclosure (4)). Completion of both the Coast Guard FRO and ICS training programs (up to and including the Advanced Incident Commander Level training) will fulfill both the time and competency requirements for the IC training level.

Operational unit commanders and personnel within their command staff who may be designated as the IC or Deputy IC shall be trained to this level (see enclosure (2)).

- (4) Hazardous Materials Technician. This level requires at least 24 hours of training and advanced competencies in controlling, containing and/or confining hazardous substance releases (see competencies numbered 7-15 in enclosure (4)). Because this level of training is primarily intended for individuals who work at industrial facilities (such as petro-chemical facilities) and because the training is specific to the type of facility and the hazardous substance itself, Coast Guard personnel (excluding those at exempted units) do not train to this level. (Note: Coast Guard personnel who work at industrial facilities with oil/ chemical storage that have a Spill Prevention, Control and Countermeasure Plan and/or a Facility Response Plan (e.g., shipyard, BSU) need to have Hazard Communication and Personal Protective Equipment training to be able to respond to incidental releases of substances at their facilities. The SPCC/Response Plan must specify what actions personnel may take in their response.)
- (5) Hazardous Materials Specialist. This level requires at least 24 hours of training equal to the technician level and advanced competencies in site safety planning and working with the chemicals or hazardous substances for which they are the specialist (see competencies numbered 16-24 in enclosure (4)). Because this level of training is intended for individuals who work in and around petro-chemical facilities and who have been trained extensively on the materials at their facility, Coast Guard personnel (excluding those at exempted units) do not train to this level. (Note: Similar to the HazMat Technician, Coast Guard personnel who work at industrial facilities with oil/chemical storage that have a Spill Prevention, Control and Countermeasure Plan (e.g., shipyard, BSU) need to have Hazard Communication and Personal Protective Equipment training to be able to respond to incidental releases at their facilities. The SPCC/Response Plan must specify what actions personnel may take in their response.)
- (6) Skilled Support Personnel. These workers are not required to meet the training required for the FRO level, but they shall be given an initial briefing at the site prior to their participation in any emergency response (see competencies numbered 55-59 in enclosure (4)).
- (7) Post-Emergency Response Workers. These workers are required to receive 40 hours of initial instruction and three days of supervised field experience (see competencies numbered 37-50 in enclosure (4)). Coast Guard personnel (excluding those at exempted units) do not train at this level as they begin work during or at the onset of the emergency response phase in accordance with the National Contingency Plan.

e. Training Program.

- (1) Initial Training. Both of the First Responder Awareness (FRA) and Operations Levels (FRO) have training curriculum that outline the minimum terminal performance objectives that must be covered. These objectives are broad in nature and must be adapted by the unit level trainers to the unit's expected hazards such as clandestine labs, oil spills, and/or chemical releases. Training modules addressing expected hazards, while meeting the terminal performance objectives, have been developed and can be found on the Coast Guard Learning Portal under the Collaboration Tab, titled: "Safety Management." In order to meet initial training requirements members must complete either the standard curriculum (i.e., training modules) or one of the following courses that have been determined to meet the associated training level(s). Members seeking to use an alternate course not listed below must submit a request to Commandant (CG-1132) via their Chain of Command.
 - (a) The training requirements for general and oil/chemical hazards at the First Responder Awareness and First Responder Operations levels can be met by attending any one of the following courses:
 1. Pollution Incident Response (PMIS: 502010)
 2. Waterfront Facilities Inspection (PMIS: 502009)
 3. MST "A" School (PMIS: 210110)
 - (b) The training requirements for general hazards at the First Responder Awareness and Operations levels can be met by attending any one of the following courses:
 1. Unit Safety Coordinator (PMIS: 500813)
 2. Marine Inspector (PMIS: 501869)
- (2) Required Training Levels. An example training matrix, based upon unit type and mission, can be found in enclosure (2). Please note that due to the inherent differences between Coast Guard units, deviations from this training matrix are expected. If those deviations reduce the level or amount of training being performed, they must first be reviewed by the cognizant Safety and Environmental Health Officer (SEHO) in coordination with the unit command, and then approved by the District Coordinator.
- (3) Required Training Modules. Due to differences in units' missions, capabilities and operations, and because of the continually emerging hazards (such as clandestine drug labs being built on vessels and in shipping containers), the Emergency Response Training Curriculum was developed as a modular system based-off of a core curriculum. Modules covering general, oil/chemical, WMD, and clandestine labs are available for use by all units and can be found on the USCG Portal under the Collaboration Tab titled: "Safety Management." These modules must be combined by instructors to meet both the time and competency requirements for the specific training levels. Each module is designed to be taught either in conjunction with other modules or as a stand-alone training course. Additional modules, as operations dictate, may be added or updated by Commandant (CG-1132). Certified Emergency Response trainers are authorized and encouraged to modify the graphics and layout of the standard presentations for their unit's needs, provided the core content of the modules is not altered.

(4) Refresher. Every training level requires an annual refresher, except for skilled support that may have on-the-job field training specific to the incident and their roles and responsibilities. There are no regulatory time requirements, and each training level's refresher is only applicable for that training level. FRA, FRO, and IC refresher training may be accomplished in any one of the following ways:

(a) By repeating an initial training program (as outlined in section 4.e.(1) above).

(b) By completing any one of the following schools which include a sufficient amount of Safety and Emergency Response training to qualify as being a refresher course for the First Responder Awareness and Operations level:

1. MST "A" School (PMIS: 210110)
2. Pollution Incident Response (PMIS: 502010)
3. Waterfront Facilities Inspection (PMIS: 502009)
4. Unit Safety Coordinator (PMIS: 500813)
5. Safety Manager (PMIS: 501746)
6. Port State Control Officer (PMIS: 501864)
7. Marine Inspector (PMIS: 501869)
8. Emergency Response Train the Trainer (PMIS: 501156)
9. Emergency Response Train the Trainer Refresher (PMIS: 501535)

(c) By completing a combination of the below training topics within one year of completing the initial or refresher First Responder training. Refresher FRA training may be accomplished by completing items 1 and 2 below, which are required annual unit level training, along with two additional topics (making it a total of four training topics). Refresher FRO and IC training may be accomplished by completing items 1 and 2 below, which are required annual unit level training, along with an additional six topics (making it a total of eight training topics). Each of these training sessions must be appropriately documented, preferably using an electronic database, such as TMT or Direct Access. However, paper records may be kept in the individual member's training record (see enclosure (5) for an example Training Documentation Form).

1. Hazard communication;
2. Personal protective equipment;
3. Weapons of Mass Destruction (WMD – Chemical, Biological, Radiological, and High Explosive Weapons) Awareness Level;
4. Respiratory Protection;
5. Operational Risk Management (ORM), Team Coordination Training (TCT), or Risk-based Decision Making (RBDM) guidelines;

6. Hearing conservation;
 7. Blood-borne pathogens & infectious disease control;
 8. Physical hazards such as slips, trips and falls and/or heat/cold stress;
 9. Non-ionizing radiation;
 10. Toxicology;
 11. Incident Command System (ICS) and FEMA IS courses 200 or higher;
 12. VOSS/SORS or other boom deployment exercise;
 13. “Hot wash” of an actual response event;
 14. Any other safety & health training or exercise that is documented as being inherently related to response operations; and
 15. Any one of the Emergency Response Training Curriculum modules.
- f. Documentation and Tracking. Training rosters (paper or electronic) must be appropriately maintained at the unit where training occurred for as long as required by reference (f); likewise, a copy shall be forwarded to the District Coordinator. The unit shall ensure all training is properly entered and documented in Direct Access and TMT using the course titles and codes (PMIS numbers) listed below.
- | | | |
|-----|---|--------|
| (1) | Emergency Response-First Responder Awareness | 501538 |
| (2) | Emergency Response-First Responder Operations | 501540 |
| (3) | Emergency Response-Incident Commander | 501542 |
| (4) | Emergency Response-Train the Trainer (TTT) | 501156 |
| (5) | Emergency Response-TTT Refresher | 501535 |
| (6) | Emergency Response-FRA Refresher | 501539 |
| (7) | Emergency Response-FRO Refresher | 501541 |

5. RESPONSIBILITIES.

a. District Commands and Certification of Unit-Level Trainers.

- (1) District Commands. Each District (normally the District Response Advisory Team) shall identify an Emergency Response / HazWOpER Coordinator. This Coordinator shall ensure that there is a sufficient number of qualified Emergency Response trainers available to units in their District, certify the trainers, and maintain records of their certifications in accordance with reference (f). Likewise, Coordinators shall serve as the District point of contact for this Instruction and the Emergency Response training program. District Coordinators are encouraged to explore the use of Auxiliaries, Reservists and Civilians as well as Active Duty personnel to meet the needs of this Instruction.

(2) Certification of Unit-Level Trainers. OSHA regulations (29 CFR 1910.120(q)(7)) stipulate that trainers must meet a performance standard: (1) have training or academic credentials and instructional experience necessary to demonstrate good instructional skills, and (2) have a good command of the subject matter of the course(s) they are teaching. OSHA recommends that trainers satisfactorily complete a training course for trainers. Therefore, before being certified by the District Coordinator as fulfilling the competency requirements, a trainer must:

- Attend the Emergency Response Train the Trainer course **or** an equivalent training course (e.g. Instructor Development Course) **or** show proof of their instructional experience, **and**
- Demonstrate knowledge of the material he/she will be teaching (e.g. from previous work experience or training).

In order to maintain certification, trainers must instruct, supervise, or jointly deliver the curriculum at least two times in a calendar year and, on a quadrennial basis, attend the Emergency Response Train the Trainer or its recertification course, an equivalent training program (e.g., train the trainer courses offered by other agencies), or show proof of their continued competency. An example certification letter is included as enclosure (6). Questions regarding whether a course would be considered “equivalent” should be sent to Commandant (CG-1132).

b. Sector/Unit Commands. Each Sector/Unit required to have Emergency Response training as directed by this Instruction and reference (a) shall ensure that adequate time is allotted for this training. Furthermore, units must ensure that all members of the command meet the training requirements prior to conducting missions or operations where the member may potentially be involved in an emergency response to an oil spill, hazardous substances release or WMD incident.

6. REIMBURSEMENT OF TRAINING COSTS. Trainers may be reimbursed for local travel expenses provided the proper administrative procedures are followed. Use the proper Chain of Command to determine if funding is available. If needed, contact Commandant (CG-1132) for support at least four weeks prior to planned travel.

7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS. Environmental considerations were examined in the development of this Instruction and have been determined to be not applicable.

8. FORMS/REPORTS. None.

MARK TEDESCO //s//
Director of Health, Safety and Work-Life

- Encl: (1) Background of Emergency Response Operations
(2) Unit Training Matrix
(3) OSHA Training Requirements for Workers (ref: 29 CFR 1910.120)
(4) Competency Requirements (ref: 29 CFR 1910.120(q))
(5) Example Training Documentation Form
(6) Example Certification Letter for Trainers

Background of Emergency Response Operations

1. Emergency Response Involving Hazardous Substances. For Coast Guard personnel, training for emergency response operations involving actual or potential hazardous substances releases has normally been associated with the “traditional” marine safety activity of oil spill response. However, other emergency response missions such as search and rescue, law enforcement, and port security could involve oil and/or hazardous substances. Intuitively, it is easy to recognize that hazardous substances are or may be present in spills of oil or releases of chemical products, but other incidents where they may also be found include: vessel fires that generate toxic gases, smoke and fumes; terrorist incidents involving chemical, biological, radiological, and/or high yield explosive weapons; discovery of a clandestine drug lab that has pressurized toxic gases in unstable conditions; port state control and security boardings of unsanitary ships; and, natural disasters with contaminated flood waters. Coast Guard personnel have a responsibility to protect the public and themselves, within their training and resource limits, from such hazardous substances and other hazards present during emergency response activities. Training, as a component of a comprehensive safety and health program, provides the skills, knowledge, attitudes, and abilities that will help ensure Coast Guard personnel can anticipate, recognize, evaluate, control, and manage such hazards, safeguarding both public and responder health.
2. OSHA’s Hazardous Waste Operations and Emergency Response (HazWOpER) Standard. In 1990, the Occupational Safety and Health Administration (OSHA) began enforcing reference (a), the Hazardous Waste Operations and Emergency Response regulations. These regulations were promulgated to protect hazardous waste workers and emergency responders from actual and *potential* releases of hazardous substances. Included in the regulations are specific training requirements that are based on the roles and responsibilities of workers during operations and responses that involve hazardous substances. The focus of the standard - as with all OSHA standards - is to ensure that employers provide a “safe and healthful workplace” to employees at hazardous waste sites and hazardous waste Treatment, Storage, or Disposal Facilities, and for emergency response operations involving hazardous substances. A primary component of the standard is the teaching of employees to recognize the human hazards present during emergencies and how to protect themselves and others against such hazards. Executive Order 12196, Occupational Safety and Health Programs for Federal Employees and Title 29 CFR Part 1960, Basic Program Elements for Federal Employees (references (d) and (g)), require federal agencies to follow OSHA regulations and standards and to incorporate them in agency guidance; exceptions exist only for “military-specific operations.” The Safety and Environmental Health Manual, COMDTINST M5100.47 (series) (reference (h)), provides general Coast Guard health and safety requirements and provides for the application of OSHA standards in the absence of specific Coast Guard guidance, regardless of whether a particular operation may involve non-military personnel or be considered “military-specific.” This Commandant’s Instruction further reinforces the application of reference (a) to Coast Guard personnel as outlined in Executive Order 12196 and 29 CFR 1960, and expands upon

the training guidance in OSHA Booklet 3172 to provide specific training requirements for various types of Coast Guard emergency response operations. “Training Marine Oil Spill Response Workers Under OSHA’s Hazardous Waste Operations and Emergency Response Standard,” OSHA Booklet 3172 (reference (i)), is OSHA’s guidance for training needed by typical oil spill response workers in accordance with reference (a).

3. HazWOpER Training Levels. The training levels, as outlined in Title 29 CFR Part 1910.120 - the Emergency Response / HazWOpER regulations, are divided into two major categories: emergency response and post-emergency response.
 - a. Emergency response, as defined in reference (a), is:

“a response effort by employees from outside the immediate release area or by other designated responders ... to an occurrence which results, or is likely to result, in an uncontrolled release of a hazardous substance. Responses to incidental releases of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel are not considered emergency responses within the scope of this standard. Responses to releases of hazardous substances where there is no potential safety or health hazard ... are not considered to be emergency responses.”
 - b. Uncontrolled hazardous substance incidents are situations where the substance is moving or there is a likelihood of movement. For example, if a vessel is aground and there is a threat of a discharge, an uncontrolled situation exists and the incident is classified as an emergency response. Other uncontrolled situations include: floating drug labs; vessel or aircraft fires; weapons of mass destruction and/or opportunity incidents; evidence recovery¹ following aircraft crashes; floating drums; skimming, pumping, salvage or lightering operations; and waterborne oil cleanup operations. Storage tanks and hazardous substances stored at Coast Guard units have (or should have) sufficient containment for incidental spills; therefore, spills from Coast Guard units will rarely become “uncontrolled.” Coast Guard personnel at facilities required to maintain Spill Protection, Control and Countermeasure (SPCC) Plans or Facility Response Plans do not typically need Emergency Response training. These personnel should have Hazard Communication training and Personal Protective Equipment training in order to respond to an incidental release of material. The plans should clearly specify what actions personnel may take in their response.
 - c. Post-emergency response is that portion of an emergency response performed “after the immediate threat of a release has been stabilized or eliminated and cleanup of the site has begun.” For spill response missions, this phase would occur when the products are in a secure container with no compromised structural

¹ Although the Coast Guard does not normally perform body recovery operations, information on protection from biohazards associated with body recovery is addressed in separate Cost Guard guidance, such as Blood-borne Pathogens training.

- integrity (e.g., floating bladders, barges, drums, and roll-off containers on shore) or when “stranded” on shore with no reasonable expectation to be re-released into the environment by wave or storm effects, essentially above the high tide mark or storm surge boundary. Floating oil is not considered stabilized, even if contained within a boom; therefore, booming and skimming operations are not considered post-emergency. Examples of operations in the post-emergency phase would be post-SAR salvage and repair operations conducted at the pier or battery recovery operations conducted by Aids to Navigation Teams.
- d. For incidents that transition from an emergency response to a post-emergency response, the personnel who start out in the emergency response phase and continue working into the post-emergency response phase need only to have the training required for the emergency response phase. For example, a ship goes aground and spills 500 gallons of heavy oil into the water. A crew with emergency response training (e.g., FRA and FRO) deploys a boom around the vessel to corral the oil and then employs a skimmer to remove it. Despite these efforts, approximately 150 gallons end up on the beach. The crew then picks up shovels and manually removes about 100 gallons of oil. All of these actions, so far, have been in the emergency response phase. That evening, there is a high high tide and strong winds which blow the remaining 50 gallons well above the surf-line. At this point the response goes from the emergency phase to the post-emergency phase as there is no reasonable expectation that the oil will be re-released back into the water. As long as the same crew is used, they do not require post-emergency phase training prior to completing their task of removing the remaining 50 gallons of oil. Since very few Coast Guard personnel, with the exception of specially trained and equipped personnel, e.g. Strike Teams, initially go into an event during the post-emergency phase, meeting the training requirements for the emergency phase renders personnel “trained” for any subsequent post-emergency operations as well.

Unit Training Matrix

Unit type	Personnel or activities requiring training	First Responder – Awareness ¹	First Responder – Operations ¹	Incident Commander
All	All personnel (Active Duty, Reserve, Auxiliary)			
	All operational forces (Active Duty, Reserve, Auxiliary)	X		
	Command center staffs	X		
Sectors	Command cadre	X	X	
	Public Affairs	X		
	Prevention Dept - All	X		
	Aids to Navigation Teams	X		
	ANT Boat Crews	X	X	
	Response Dept	X	X	
	Incident Mgmt Div.	X	X	
	Groups/Stations	X		
	Small boat crew	X	X	
	Cutters/Tenders/Patrol Boats	X		
	Law Enforcement / Security Boarding Teams	X		
	Logistics Dept	X		
	Planning Div.	X		
Air stations	All personnel	X		
Cutters	All personnel	X		
	VOSS/SORS personnel	X	X	
DOG units & LE Ops	Law Enforcement / Security Boarding Teams	X		
MISC – ICS Emergency Response Org.	Incident Commander & Deputy	X	X	X
	Safety Officer	X	X	
	Operations: Field Personnel	X	X	
	Operations Section Chief	X	X	

General note: Boxes that are “X’d” indicate that the training is **generally** required for personnel at those types of units or in that particular billet. Boxes that are blank indicate that the training should be conducted “as needed.” Personnel should always have the highest level of training based on the tasks or positions they may hold at their unit. **This matrix is not comprehensive and is meant to be a basic guideline** for who would need FRA, FRO, and/or IC training. If there is a question about what level is needed, please contact the unit’s cognizant Safety and Environmental Health Officer for guidance.

¹ The FRA and FRO training modules are broken down in to different areas of emphasis, such as: general hazards; oil/chemical; WMD; and clandestine labs. See paragraph 4.e.(3) of the Instruction for details on how to use the modular system of training.

OSHA Training Requirements for Workers (ref: 29 CFR 1910.120)

HAZWOPER 29 CFR 1910.120	Worker Category	Worker Description	Training Requirements	Training Providers
Emergency Response (q)(4)	Skilled Support Personnel	Persons skilled in the operation of specialized equipment or support processes	Site Safety Briefing on Topics (55-59) AND Sufficient training as determined by the ICS Safety Officer	ICS Safety Officer or an Assistant Safety Officer
(q)(6)(i)	First Responder Awareness	Persons who witness a release or potential release and report it.	Sufficient training and/or experience AND competencies (31 - 36)	TRACEN, DRAT or Unit Level Trainers
(q)(6) (ii)	First Responder Operations	Persons who respond to releases or potential releases, but respond defensively	8 hours AND competencies (25 - 36)	TRACEN, DRAT or Unit Level Trainers
(q)(6) (iii)&(iv)	Hazardous Materials Technician/Specialist	Persons directly acting to contain, control & stop a release of hazardous materials	24 hours AND competencies (7-15/ 16 – 24)	Contact CG-1132 ¹
(q)(6) (v)	On Scene Incident Commander	Persons who assume control beyond first responder awareness level	FRO (8 hrs) and 16 hrs of add'l ICS training AND competencies (1 – 6)	ICS – Incident Commander Course
(q)(8)	Annual Refresher Training	All emergency response personnel	Sufficient training as defined by COMDTINST 6260.31(series)	DRAT or Unit Level Trainers
Post-Emergency (q)(11) and (e)(3)(i)	General Site Workers, laborers, supervisory personnel	Persons engaged in activities that expose or potentially expose them to hazardous substances and health hazards	40 hours AND 3 days field experience AND competencies (37-43)	Contact CG-1132 ¹
(ii)&(iii)	Workers on site occasionally for a specific task or regularly on site with low exposure potential	Persons who are unlikely to be exposed above exposure limits or persons working in areas fully monitored, fully characterized indicating exposures below exposure limits and no possibility of an emergency developing	24 hours AND 1 day field experience AND competencies (44-50)	Contact CG-1132 ¹
(e)(4)	On-site managers and supervisors	Persons who supervise employees engaged in hazardous waste operations	Requirements of (e)(3)(i) or (e)(3)(ii)&(iii) AND competencies (51-54)	Contact CG-1132 ¹
(e)(8)	Annual Refresher Training	All post-emergency response personnel	8 hours	Contact CG-1132 ¹

Note 1: This level of training is beyond the normal level of CG emergency response operations. However, if a unit desires to have such training, a request should be made to Commandant (CG-1132), through the chain of command, endorsed by the unit's cognizant Safety and Environmental Health Officer.

Competency Requirements (ref: 29 CFR 1910.120)

ON-SCENE SUPERVISOR/INCIDENT COMMANDER (IC)

- 1) Know and be able to implement the employer¹'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) Be knowledgeable of the state emergency response plan and of the Federal Regional Response Team.
- 6) Know and understand the importance of decontamination procedures.

ACTIVE RESPONSE (HAZMAT TECHNICIAN)

- 7) Know how to implement the employer's emergency response plan.
- 8) Know the classification, identification, and verification of known and unknown materials by using field survey instruments and equipment.
- 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.
- 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) Understanding terminology and behavior of chemicals and their toxic effects.

ACTIVE RESPONSE (HAZMAT SPECIALIST)

- 16) Understand classification, identification, and verification of known and unknown materials by using advanced survey instruments and equipment.
- 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) Be knowledgeable of the state emergency response plan.
- 21) Have the ability 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.

DEFENSIVE RESPONSE (FRO)

- 25) Knowledge of basic hazard and risk assessment techniques.
- 26) Know how to select and use proper personal protective equipment necessary for the first responder operation level.
- 27) Understand basic hazardous materials terms.
- 28) Know how to perform basic control, containment, and/or confinement operations within the capabilities of the resources and available personal protective equipment.
- 29) Know how to implement basic decontamination procedures.
- 30) Understand the relevant standard operating and termination procedures.

¹ "Employer" is the person engaged in a business that has employees (as defined by 29 CFR 1910.2(c)). For example, Coast Guard personnel only "employ" other Coast Guard personnel, they do not employ non-Coast Guard such as contractors, state and local employees, or other federal agency employees.

INITIATE RESPONSE ONLY (FRA)

- 31) Understand the hazards of oil and other hazardous substances and the risks in a spill.
- 32) Understand what happens during emergency involving spilled oil or other hazardous substances
- 33) Recognize the presence of oil and other hazardous substances in an emergency.
- 34) Identify hazardous substances, if possible (e.g., appearance, smell, monitoring equipment).
- 35) Understand individual role in employer's emergency response plan.
- 36) Recognize when help is needed and request assistance from a response team.

POST-EMERGENCY—ABOVE EXPOSURE LIMITS

- 37) Know the name(s) of the site safety and health personnel for spill cleanup.
- 38) Knowledge of the safety, health, and other hazards present during oil spill or other hazardous materials cleanup.
- 39) Knowledge of the safe cleanup work practices to minimize risks from existing hazards.
- 40) Know how to use available controls and equipment, including personal protective equipment, to minimize risks from hazards present.
- 41) Know the contents of the safety and health plan prepared for the specific cleanup.
- 42) Know and be able to recognize signs and symptoms of overexposure to hazards present.
- 43) Be knowledgeable of the medical surveillance requirements.

POST-EMERGENCY CLEANUP—BELOW EXPOSURE LIMITS OR NON-RECURRING MINIMAL EXPOSURE

- 44) Know the name(s) of site safety and health personnel for spill cleanup.
- 45) Knowledge of the safety, health, and other hazards present during oil or other hazardous materials spill cleanup.
- 46) Knowledge of the safe cleanup work practice to minimize risks from existing hazards.
- 47) Know how to use available controls and equipment, including personal protective equipment, to minimize risks from hazards present.
- 48) Know the contents of the safety and health plan prepared for the specific cleanup.
- 49) Know and be able to recognize signs and symptoms of overexposure to hazards present.
- 50) Be knowledgeable of the medical surveillance requirements.

SUPERVISOR/MANAGER FOR CLEANUP OPERATIONS

- 51) Be able to implement the employer's safety and health program.
- 52) Be able to implement the employer's personal protective equipment plan.
- 53) Be able to implement the employer's spill containment program.
- 54) Be able to implement health hazard monitoring procedure and techniques.

BRIEFING TOPICS (ALL LEVELS)

- 55) Purpose of visit or duties to be performed.
- 56) Site personnel, chain-of-command, and communications procedures.
- 57) Chemical/physical hazards involved, signs and symptoms of exposure.
- 58) Emergency alarm system, escape routes, and places of refuge.
- 59) Appropriate personal protective equipment and other control measures provided.

Emergency Response – equivalent training documentation for
First Responder Awareness Level and First Responder Operations Level

Name _____ EMPLID _____

Use this form to certify equivalent unit level safety training that can be directly related to emergency response operations. Training must directly focus on the specific duties and functions of the responder or site worker during a hazardous substance or oil spill response. Within one year of completion of the initial Emergency Response training or previously documented annual Emergency Response refresher training, a member must complete and document four of the following training topics or events to meet Awareness Level training equivalency. Likewise, Operations Level training requires completion and documentation of eight of the topics/events. Topics 1 and 2 are mandatory and required annually, counting as two of these required four/eight topics. Each of the other topics or events can count for one of the required sessions. Only one credit per topic can be counted.

I. Equivalent Training

	Equivalent Training:	Hours	Date	Initials of Certified Trainer
1	Hazard Communication			
2	Personal Protective Equipment			
3	Weapons of Mass Destruction (WMD)			
4	Operational Risk Management (ORM) or, Team Coordination Training (TCT) or, Risk-Based Decision Making (RBDM)			
5	Blood-borne pathogens & infectious disease control			
6	Hearing Conservation			
7	Respiratory Protection			
8	Non-ionizing radiation			
9	Toxicology			
10	ICS 200 or higher / FEMA IS-Course			
11	VOSS/SORS or other boom deployment exercise			
12	“Hot wash” of actual response event			
13	Heat Stress/ Cold Stress			
14	Clandestine Labs			

II. Other: Any other safety and health training which is documented as being inherently related to response operations:

III. Any one of the Emergency Response Training Curriculum modules:

Certified Emergency Response Trainer

Certification Date

U.S. Department of
Homeland Security

United States
Coast Guard



Your Unit Name
United States Coast Guard

Your Street
City, State Zip Code
Staff Symbol:
Phone:
Fax:

Example Certification Letter for Trainers

MEMORANDUM

From:

Reply to

Attn of:

To:

Thru:

Subj: CERTIFICATION AS AN EMERGENCY RESPONSE AWARENESS AND OPERATIONS
LEVEL TRAINER

Ref: (a) Safety and Health Training Requirements for Emergency Response Operations,
COMDTINST 6260.31 (series)
(b) Information and Life Cycle Management Manual, COMDTINST M5212.12 (series)

1. Congratulations! In accordance with reference (a) you have completed all of the competency requirements in order to be certified as an emergency response trainer for the following courses:

- a) First Responder Awareness Level
- b) First Responder Operations Level

2. As a Certified Emergency Response Trainer you have the duties of providing Awareness and Operations Level training, as required by reference (a), to personnel at your command. Training materials that you may use to give training can be found on the Coast Guard Learning Portal. In order to make the material more applicable to the unit you are training, you are encouraged to adapt the power point slides as long as you keep the core content. Rosters of your training classes shall be maintained by the command in accordance with reference (b) and a copy shall be forwarded to your District Coordinator.

3. In order to maintain your certification, you must instruct, supervise, or jointly deliver the Emergency Response Training Curriculum at least two times per calendar year. Furthermore, on a quadrennial basis, you must attend the Emergency Response Train-the-Trainer / Refresher course or an equivalent training program, or show proof of your continued competency to the District Coordinator, Mr./Ms. XXXXX.

4. Our office appreciates your assistance in this program and looks forward to working with you. If you have any questions or concerns the POC for our office is Mr./Ms. XXXXXX. He/She can be reached at xxx-xxx-xxxx.

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