

OSHA and HAZWOPER

Participant Guide

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Midwest Consortium for Hazardous Waste Worker Training

Acknowledgments

The Midwest Consortium developed this course for company managers, workers and residents who may be affected by the Hazardous Waste Operations and Emergency Response standard enforced by the Occupational Safety and Health Administration (OSHA) under cooperative agreement number U45 ES 06184 from the National Institute of Environmental Health Sciences.

We encourage you to comment on these materials. Please give your suggestions to those leading the program in which you are now enrolled, or forward them to the Midwest Consortium for Hazardous Waste Worker Training by clicking on 'contact us' at https://mwc.umn.edu.

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Disclaimer

The Occupational Safety and Health Administration (OSHA) regulation to help assure worker health and safety during hazardous waste site, work at treatment/storage/disposal facilities and emergency response activities requires specific training and other health and safety measures depending upon the duties to be performed. Knowledge about the requirements for each of these employment sectors enables an assessment of compliance. This awareness program does not replace training required by OSHA standards.

Content was updated on May 17, 2024 and all web links are active as of that date; if you find an error, please inform the facilitator so that it can be updated.

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Introduction: OSHA and HAZWOPER

The Occupational Safety and Health Act (OSHAct) of 1970 is a major law concerned with worker health and safety. It was passed to prevent workers from being killed or seriously harmed at work. The law requires employers to provide their employees with working conditions that are free of known dangers. The Act created the Occupational Safety and Health Administration (OSHA), which sets and enforces protective workplace safety and health standards. An important workplace standard to protect against exposure to hazardous materials is titled Hazardous Waste Operations and Emergency Response (HAZWOPER).

At the end of the session, you will be better able to do the following:

- Describe employer and employee rights and responsibilities under OSHA
- Identify written health and safety plans or programs that are in place
- Describe the different kinds of operations and facilities covered by HAZWOPER
- ➤ Identify parts of the standard that apply to facilities where you work or near where you live
- Describe training and programs/plans that are required at worksites covered by HAZWOPER

Occupational Safety and Health Administration (OSHA)

The Occupational Safety and Health Administration (OSHA) was formed following passage of the Occupational Safety and Health Act (OSHAct), signed into law by President Nixon on December 29, 1970.

When you have completed this section, you will be better able to:

- > Describe employer and employee rights and responsibilities under OSHA
- > Identify written health and safety plans or programs that are in place

OSHA covers private sector employers of all sizes in all 50 states, the District of Columbia, and other U.S. jurisdictions. Small employers (fewer than 10 employees) are exempted from some injury record-keeping requirements (29 CFR 1904). Laws are administered by federal OSHA or through an OSHA-approved state program. State-run health and safety programs must be at least as effective as the Federal OSHA program. To find the contact information for the OSHA Federal or State Program office nearest you, see the Regional and Area Offices map at http://www.osha.gov/html/RAmap.html.

Employees who work for state and local governments are not covered by Federal OSHA but have OSHAct protections if they work in a state that has an OSHA-approved state program. Four additional states and one U.S. territory have OSHA approved plans that cover public sector employees only: Connecticut, Illinois, New Jersey, New York, and the Virgin Islands. Private sector workers in these four states and the Virgin Islands are covered by Federal OSHA.

Federal agencies must have a safety and health program that meets the same standards as private employers. Although OSHA does not fine federal agencies, it does monitor federal agencies and responds to worker complaints. OSHA also provides information, training and other assistance to workers and employers. Regulations set by OSHA are published in Section 29 of the Federal Register, with Part 1915 reserved for maritime industries, Part 1910 for general Industry, and Part 1926 for the construction industry.

Those not covered by the OSHAct include the self-employed, immediate family members of farm employers that do not employ outside employees, and employees at workplaces regulated by another Federal agency (for example, the Mine Safety and Health Administration, the Federal Aviation Administration, the Coast Guard).

In addition to setting standards, OSHA is charged with:

- Inspecting workplaces to ensure standards are being met
- Issuing citations and fines to companies that do not meet the standards
- Overseeing state plans
- Encouraging the development of training programs for workers, management, and health professionals

Exercise - Employer and Worker Rights and Responsibilities

The following set of questions is intended to see how much you already know about worker and employer safety and health rights and responsibilities. For each of the following questions, answer "True" ("T") or "False" ("F"), using your current understanding of the law. The facilitator will review the correct answers to each of these questions with you at the end of this section.

T or F	1.	The employer must pay for all health and safety equipment required by OSHA standards.
T or F	2.	OSHA can fine workers for violating OSHA standards.
T or F	3.	The employer doesn't have to correct problems cited by OSHA until all legal Appeals are exhausted.
T or F	4.	OSHA violations can be issued when workplace hazards are causing serious physical harm.
T or F	5.	If OSHA conducts an inspection of the work site, the union or employee representatives must be paid for time he or she spends on the walk-around, according to OSHA regulations.
T or F	6.	OSHA has the right to enter the workplace and conduct an inspection at any time, whether the employer wants it or not.
T or F	7.	The "general duty clause" can be used by OSHA if a serious hazard exists but no specific safety and health standard covers the problem.
T or F	8.	According to the OSHAct, the employer and the employees have an equal duty to provide a safe and healthful workplace.
T or F	9.	If employers receive an OSHA citation, they must appeal it within a certain number of days or the citation becomes final.
T or F	10.	The OSHA 300A form must be posted during the months of February, March, and April and presents the annual summary of recordable employee injuries.

Rights and Responsibilities under OSHA

Employers and workers have rights and responsibilities in workplaces covered by OSHA. These are reviewed below:

Employer Rights

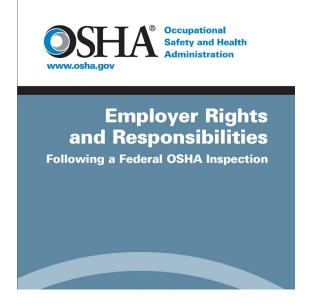


Image credit: https://www.osha.gov/Publications/osha3000.pdf.

Employer Rights following an OSHA inspection

If a worksite inspection is conducted, the employer has rights to an informal conference to discuss the apparent violations, to contest the citation and to petition for a modification of abatement dates. See https://www.osha.gov/Publications/fedrites.html.

Employer Responsibilities

Employer Responsibility to Furnish a Safe and Healthy Job and Work Environment

The employer must furnish each employee a job and a place of employment free from recognized hazards that are likely to cause death or serious physical harm. This responsibility is commonly referred to as the "general duty clause" of the Act. It describes the overall or general responsibility of the employer not to expose employees to harmful situations or chemicals.

Employer Responsibility to Pay for Personal Safety Equipment

The employer must pay the full cost for almost all required personal protective equipment (PPE) used to comply with OSHA standards with the exception of safety shoes and prescription safety eyewear that may be used off the jobsite.

Employer Responsibility to Comply with OSHA Standards

Employers must comply with applicable parts of the OSHA General Industry Standards and the Construction Industry Standards.

This includes:

- informing workers of chemical hazards during training and using methods that may include labels, alarms, color-coded systems, and information resources
- conducting training in a language and vocabulary understandable to the workers
- performing assessments including air sampling required in standards
- providing medical tests required in standards

Employer Responsibility to Report Fatalities and Injuries

Employers must inform OSHA of any fatality within 8 hours of the event. The employer must inform OSHA of any injury requiring inpatient hospitalization, an amputation, or any loss of an eye within 24 hours.

Employer Responsibility to Maintain Records of Injuries

Under OSHA, all employers with more than 10 employees must maintain a log of injuries and make it available to OSHA compliance officers upon request. Each year the employer must post an annual summary of the injury log for the information of the employees. This form is called the OSHA 300A and must be displayed each year for the months of February, March, and April. A portion of the form is shown on the following two pages.

Employers are required to record information about specific occupational injuries and illnesses. Every occupational death and non-fatal illness must be recorded on the OSHA log. Other non-fatal injuries which must be recorded include loss of consciousness, restriction of work motion, transfer to another job, or medical treatment other than First Aid.

Contact the local OSHA office with questions about recordable illnesses and injuries.

Employer Responsibility to Post Information

The official OSHA *Job Safety and Health – It's the Law* poster that describes rights and responsibilities must be posted prominently in the workplace at all times. Download it here: https://www.osha.gov/Publications/poster.html.

Any citation for apparent violations received from OSHA must be posted until the items are resolved where workers can see each page.

The annual summary of injury and illness data must be posted where workers can see the form during the months of February, March, and April of each year.

Employer Responsibility to Not Retaliate

If a worker exercises rights under the law, including the right to report a work-related injury or illness, the employer must not retaliate.

See also https://www.osha.gov/as/opa/worker/employer-responsibility.html.

Worker Rights

Workers have a number of rights and responsibilities under the Act. Detail is shown at the OSHA website, www.osha.gov - click on "You have the Right to a Safe Workplace".

See also Workers' Rights booklet at https://www.osha.gov/Publications/osha3021.pdf:





A brief summary follows.

Worker Right to Have an Inspection of a Workplace

A worker can notify OSHA of a potential hazard by completing the OSHA Notice of Alleged Safety or Health Hazards form, below. This is often called a 'complaint form'. Once a complaint is received at the OSHA Office, it will be assigned to one of their compliance officers.

The inspection priority defined by OSHA is:

- Imminent danger
- Catastrophic (a fatality or three or more workers are hospitalized overnight as a result of an on-the-job exposure)
- Complaint inspection (filed by a worker or worker representative)
- Scheduled inspection (general OSHA inspection not because of a complaint or catastrophe, but because injury statistics show that the employer has more injuries and illness than similar employers)
- General inspection or "pick of the hat." (Previously inspected sites are pooled, and, through random selection, two sites are drawn and visited in a given year)

Note that complaints are high on the priority list. The form is shown below. It can be anonymous and can be completed online.

Worker Right to Participate in the OSHA Walk-Around Inspection

Through an employee organization such as a union, an employee representative is designated to accompany the OSHA compliance officer in the walk-around inspection. It should be noted that OSHA regulations currently do not require the employer to pay the employee for time spent on the OSHA walk-around; however, some states with an OSHA plan require employees to be paid for the time spent during a walk-around. Walk-around activities include all opening and closing conferences related to the conduct of the inspection but do not include any post-citation appeal procedures.

Worker Right to Be a Witness or to Give Information

Every employee has the right to appear as a witness at an OSHA hearing. During the walk around inspection, or before or after the inspection for that matter, any employee has the right to provide OSHA with any information regarding possible safety and health hazards. This right is protected by law.

Worker Right to Be Informed of Imminent Dangers

All employees have the right to be informed by the OSHA compliance officer if it is determined that they are exposed to an imminent danger (one which could cause death or serious injury now or in the near future). The compliance officer will also ask the employer to stop the work process voluntarily and remove the employees. If the employer refuses to stop the work process upon the request of the compliance officer, a judge can force the employer to do so if necessary.

Worker Right to Be Told About Citations

Notices of OSHA citations must be posted in the workplace near the site where the violation occurred and must remain posted for three days or until the hazard is corrected, whichever is longer. Citations and penalty notification forms are, in general, available upon request from the OSHA Area Office. When an OSHA industrial hygiene inspection has taken place, the hygienist's report, which includes substances collected, procedure used, and measurement results, may also be obtained by the employees, their representatives, or their union upon request.

Worker Right to Appeal OSHA Performance

If OSHA fails to perform in a responsible and timely manner, the employees, employer, or union has the right to meet with the OSHA Area Director and the OSHA Regional Administrator. Any of the groups may ultimately appeal to the Secretary of Labor.

Worker Right to Appeal Abatement Dates (When a Violation Must Be Fixed)

The findings of the OSHA officer may be appealed within 15 working days of the issuance of the citation to the employer. The right to contest the citation is limited only to the question of the reasonableness of the abatement period of the citation. Employees or their organization cannot contest the penalty amount or the citation itself.

Worker Right to Have a Closing Conference After an Inspection

Employees have the right to meet privately with the OSHA officer and discuss the results of the inspection. OSHA procedures state that the OSHA inspector shall inform the employers and employees that a generally responsive discussion covering general issues will be held.

Worker Right to Know of Hazards

Workers have the right to information and training about hazards, methods to prevent harm and that OSHA standards that apply in the workplace. The training must be in a language and vocabulary understandable by the workers.

Employees have the right to be notified if exposed to occupational health hazards and to be notified of the results of occupational health studies conducted by the employer or OSHA officers. The employees or the employee organization can and should ask for all instrument readings or levels of contaminants investigated. A copy of the lab report should also be requested from OSHA. These documents are normally available upon request and may also be obtained by any member of the public pursuant to the Freedom of Information Act.

Worker Right to Have Access to OSHA Records

Generally, most OSHA records are available upon request. The employees, or their organization, should contact the OSHA Area Office where the plant is located.

Worker Right to Participate in Development of New Standards

Every employee has the right to participate in the development of new safety and health standards or modification of old codes through his or her employee organization. Individuals may also comment on proposed standards during open periods of comment.

Worker Right to Review a Citation Procedure When a Citation Is Not Issued

Every employee has the right to request an informal review when a citation is not issued or for any other issue related to an inspection, citation, notice of proposed penalty, or notice of intention to contest a citation. A written statement as to why a citation was not issued in particular instances may be requested.

Worker Right to File a Discrimination Complaint

If an employee has been discriminated against after exercising rights under OSHA, that employee has the right to file a complaint with the OSHA Area Office within 30 days. This time limit is strictly enforced. Similar rights to file a complaint may exist with state and local anti-discrimination agencies, as well as the employee organization.

Worker Responsibilities

Worker Responsibility to Abide by Established Safety Rules

Workers cannot be cited or fined by OSHA, but employers can take disciplinary action for violation of established safety rules.

Worker Responsibility to Wear and/or Use Required Safety Equipment

Workers are responsible for wearing and/or using required safety equipment.

Worker Responsibility to Seek Prompt Medical Treatment When Required

Workers should seek medical treatment promptly when required. Depending on applicable state law, workers have a right to be treated by a physician of their own choice for work-related injuries. The key here is not to delay medical treatment when necessary.

Worker Responsibility to Bring Safety and Health Concerns to the Attention of Management

Workers should bring safety and health hazards or concerns to the attention of their supervisors or forepersons as soon as possible. If the workers are organized, then they may want to ask the representative to bring the issue to the attention of management.

Worker Responsibility to Pay for Gear That Can Be Worn Off the Job

Workers will have to pay for ordinary safety-toed footwear, ordinary prescription safety eyewear, logging boots, and ordinary clothing and weather-related gear that can be worn off the job.

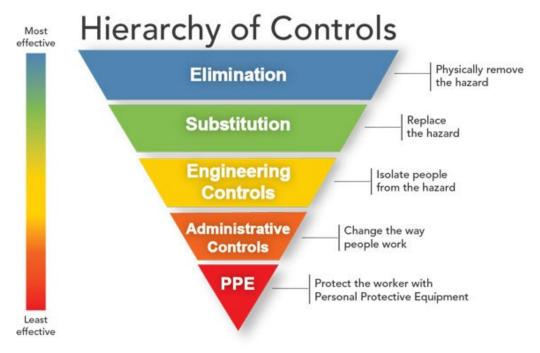
Exercise – Revisit: Employer and Worker Rights and Responsibilities

Review the answers you provided in the exercise at the beginning of this section and identify any changes you can make based on the discussion of rights and responsibilities. Update your responses, as needed based on the new information. Add questions to a discussion.

In addition to creating OSHA, the Act also created the National Institute for Occupational Safety and Health (NIOSH). NIOSH is a research arm of the Centers for Disease Control and Prevention, with the mission:

To develop new knowledge in the field of occupational safety and health and to transfer that knowledge into practice.

One tool to increase the use of the knowledge in the practice of health and safety is the hierarchy of controls, shown here.



Source: https://www.cdc.gov/niosh/hierarchy-of-controls/about/?CDC AAref Val=https://www.cdc.gov/niosh/topics/hierarchy/default.html

This scheme illustrates that the best and surest approaches to control hazards is to eliminate the exposure or substitute a less toxic material or hazardous process.

The prevention strategies rely on modifying the process (use a robot to explore a possible hazard), contain (build a box), removing through ventilation, a change in work practice that must be done diligently (day after day by everyone) or use of personal protective equipment (may not be 100% effective even when used diligently; requires proper selection, training, cleaning and maintenance).

Work practice controls are often described in written procedures (called administrative controls and include Standard Operating Procedures) that detail how work is to be done or the duration that someone can work in a particular area. For example, an administrative control for emergency response is an Emergency Response Plan that details the various procedures needed from initial assessment to response to termination; confined space entry permitting is a specific administrative control that is needed whenever permit-required spaces may be entered. PPE is the least desired control method.

Written programs and procedures are developed for many reasons, including regulatory requirements and good industry practice. The implementation of the written controls is essential - these should not just be done to 'check a box' and then get dusty in a folder - in a drawer or on a hard drive.

Exercise – What Programs, Plans and Procedures are in Place?

Use the questions below to identify health and safety plans/programs/procedures, hazard assessment and personal protective equipment (PPE) practices that are in place at the worksite. By doing the exercise, you will identify topics that have been addressed and those that may need to be addressed (or you do not have the information to know). Most of items listed are either required by OSHA or are 'good practice' as part of providing a safe and healthful work environment.

Circle 1 if you know the topic is addressed, 2 if you know it is not addressed and 3 if you are not sure.

When you have entered responses, make note of any item(s) marked 'no' or 'not sure' and that you know are not needed (example, no excessive noise exposure, so there is no hearing protection).

Programs, Plans, Procedures	Yes	No	Not Sure
Written plans, programs, procedures			
1. Is there a written Health and Safety program?	1	2	3
2. Are there written work practice descriptions?	1	2	3
3. Is there a list of training needed by workers in each job?	1	2	3
4. Is there a medical surveillance program?	1	2	3
5. Is there a written procedure to select, use and maintain Personal Protective Equipment?	1	2	3
6. Is there an Emergency Response Plan?	1	2	3
7. Is there a program to implement and maintain Exposure Controls?	1	2	3
8. Is there a Hazard Communication program	1	2	3
9. Is there a Decontamination plan?	1	2	3
10. Are evacuation routes posted and known to all?	1	2	3
11. Does the plan address after action feedback to improve procedures?	1	2	3
12. Is there a procedure for emergency alerting?	1	2	3

Hannal Annanaut			
Hazard Assessment			
1. Has a Hazard Analysis been conducted for each job?	1	2	3
2. Have "worse case" scenarios of releases been identified?	1	2	3
3. Is air monitoring conducted for routine and emergencies involving hazardous materials using written procedures?	1	2	3
4. Are drills conducted to practice for emergencies?	1	2	3
Personal Protective Equipment (PPE)			
Is everyone who uses respiratory protection fit tested at least annually?	1	2	3
2. When hearing protection is required, is there an assortment from which to choose?	1	2	3
3. Are gloves of various sizes available, to fit each user?	1	2	3
4. Are any needed protective suits available in all needed sizes?	1	2	3
5. Is there a person trained to provide replacement PPE if failures or damage occur?	1	2	3

Summary

The Occupational Safety and Health Administration (OSHA) was created with passage of the OSHAct in 1970. Employers are charged with providing employment that is free from recognized hazards; this is commonly referred to as the 'general duty clause'. Both employers and workers have rights and responsibilities. Employers and workers have rights and responsibilities in workplace health and safety.

OSHA staff develops standards to limit hazardous exposures in the workplace, and OSHA enforces standards. When a State oversees the program, it is overseen by Federal OSHA and must be at least as effects as the national effort. For specific procedures and OSHA contacts in your area, see http://www.osha.gov/html/RAmap.html.

The OSHAct also created the National Institute for Occupational Safety and Health (NIOSH) with the separate responsibility to conduct research on injuries, diseases, and controls to reduce injury and disease. The hierarchy of controls illustrates the relative effectiveness of various approaches. Only elimination/substitution removes the hazard from the workplace. All other controls require diligence.

HAZWOPER

HAZWOPER is the short title for the Hazardous Waste Operations and Emergency Response standard enforced by OSHA.

HAZ HAZardous

W Waste

OP OPerations and

E Emergency

R Response

When you have completed this section, you will be better able to:

- > Describe the different kinds of operations and facilities covered by HAZWOPER
- > Identify parts of the standard that apply to facilities where you work or near where you live
- Describe training and programs/plans that are required at worksites covered by HAZWOPER

This standard describes training and other workplace actions required at specific employment sites covered by the HAZWOPER standard. These include:

Hazardous waste sites - worksites meeting the rules set by the US Environmental Protection Agency (EPA) for a hazardous waste site, or where state or local government or a contractor requires the training. National hazardous waste sites are also referred to as Superfund sites or National Priorities List (NPL) sites; sites identified by a state are State Priority List (SPL) sites. A map of NPL sites for each state is shown here: https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=33cebcdfdd1b4c3a8b5 https://www.epa.gov/superfund/national-priorities-list-npl-sites-state. Workers at sites under redevelopment or cleanup for reuse where there are known, or potential hazardous substances contaminants also receive training under this standard; these properties may be referred to as a Brownfield. A map of Brownfield and revitalization activities is shown here: https://www.epa.gov/brownfields/brownfields-near-you

TSDF (treatment, storage and disposal facility) sites - Operations involving hazardous waste that include treatment, storage, disposal conducted at facilities that operate under a permit from by EPA under the Resources Conservation Recover Act (RCRA) or other agencies charged by EPA to implement RCRA regulation. The location of each permitted site in each state is can be found at https://rcrapublic.epa.gov/rcrainfoweb/action/modules/pm/pmindex.

Emergency response operations where releases of hazardous substances may be released or where there is a substantial threat of a release requiring planning for a response include the range of industrial facilities covered by OSHA. Those who respond from 'off site' including firefighters, governmental employees and emergency medical personnel may also be included.

The HAZWOPER standard, or 29 CFR 1910.120, includes specific requirements to protect the health and safety at workers for each of these types of workplaces.

Residents and community members who live near such facilities benefit from knowing about HAZWOPER, as emissions or emergency events may impact those outside the workplace or near a hazardous materials release.

Paragraphs in the standard are identified with numbers and letters to make it easier to locate information, similar to the numbering system used by libraries to index books.

For example, the specific requirements for training of general hazardous waste site workers are found in section 29CFR 1910.120(e)(3)(i). In the illustration below, see how to interpret the numbering of the paragraph.

Training Requirements for Hazardous Waste Site Workers

29CFR1910.120

29 = OSHA regulations are in Title 29.

CFR = Code of Federal Regulations is the title of the government publication.

1910 = Part number 1910 covers General Industry.

.120 = Section number 120 covers hazardous waste operations and emergency response.

- (e) = The paragraph which describes required
- (3) = subparagraph describes Initial training, prior to work
- (i) = subparagraph that describes initial site worker training

Requirements for companies covered by the standard are in the following paragraphs

- (a) through (o) are for site workers
- (p) is for TSDF
- (q) is for emergency responders

The full standard for general industry is shown on the OSHA website at https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.120.

29 CFR 1910.120 includes reference to other OSHA standards, including:

29 CFR 1910.38 Emergency Action Plans

29 CFR 1910.134 Respiratory Protection

29 CFR 1910.156 Fire Brigades

29 CFR 1910.165 Employee Alarm System

29 CFR Part 1910, Subpart Z (this includes permissible exposure limits (PELs))

29 CFR 1910.1020 Access to Employee Exposure and Medical Records

29 CFR 1910.1200 Hazard Communication

OSHA requirements for construction HAZWOPER operations are found in 29 CFR 1926.65, https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.65. The construction HAZWOPER also includes reference to appropriate standards in Part 1926.

Discussion: Identify what part of HAZWOPER applies to your workplace or community?

With the results of the discussion, the specifics of HAZWOPER most relevant to each participant can be explored further.

Exercise: Explore HAZWOPER

Directions: Briefly review the paragraph(s) of the standard most applicable to you. Working in small groups or individually, use the worksheet to do the following:

Select the HAZWOPER group of interest

Select an area of interest

Training that must be provided for these HAZWOPER workers

OR

Plans, programs, or procedures that must be in place for these HAZWOPER workers

List the training content or the programs/plans/procedures required in HAZWOPER.

For example, if your group selects:

TSDF and Training for new employee, then you will list requirements for that training (hint: found in 29 CFR 1910.120(p)(7)).

Compare the requirements with the responses you provided in the previous exercise if the item was covered (yes/no) or add need for assessment (more info) to complete the worksheet.

Explore HAZWOPER Worksheet

HAZWOPER group: site worker or TSDF or emergency responder (select one of the three)

Area of interest: training or plans/programs/procedures (select one of the two)

	Available	
Requirement	(Yes/No)	More Info

Summary

HAZWOPER (29 CFR 1910.120) covers workers at hazardous waste sites, at treatment/storage/disposal facilities, and those engaged in a wide range of jobs that include emergency response activities. Included in HAZWOPER are other OSHA standards that are relevant to the work conducted in these workplaces or worksites. Plans and procedures are required for work covered by HAZWOPER; specific training must be provided to the workers.

Closing and Program Evaluation

Thank you for participating in this awareness program designed to increase the knowledge about OSHA and HAZWOPER and apply the standard to work situations of interest.

Do you feel more prepared to:

- Describe employer and employee rights and responsibilities
- Identify written health and safety plans or programs that are in place
- Describe the different kinds of operations and facilities covered by HAZWOPER
- ➤ Identify parts of the standard that apply to facilities where you work or near where you live
- Describe training and programs/plans that are required at worksites covered by HAZWOPER

Are there additional questions about these goals or how the knowledge and skills learned can be used?

Please take the next 10 minutes to complete the program evaluation forms. These are important for improving the program. The Midwest Consortium does take your comments seriously and makes changes in content and the skill exercises based on feedback. Your comments are anonymous.

We hope to see you at another Midwest Consortium program in the future.