

Hazardous Materials and Terrorist Incident Response Curriculum Guidelines

Response Training Considerations

Response
Training
Considerations

Awareness

Operations

Core

Mission-
Specific

Hazardous
Materials
Technician

Specialist
Employee

Hazardous
Materials
Specialist

Incident
Commander

Hazardous
Materials
Officer

Safety
Officer

BLS
Responder

ALS
Responder

Hospital
First
Receiver

Appendix A:
Related
Standards

Appendix B:
NIMS/ICS

Appendix C:
Special
Topics

The Need to Train

Public sector employees who respond to hazardous materials and related terrorist emergencies must be properly trained to perform their jobs safely and efficiently. Their employers are responsible for ensuring the health and safety of the responding personnel as well as the protection of the public and the communities served.

Public sector training managers face a significant challenge in ensuring that all responding personnel are fully trained and prepared, while working within existing limited resources and conflicting priorities. Their challenge is compounded by many other factors that affect the competency of public sector personnel to respond. These factors include individual retention differences and various needs for refresher training; the changing and complex nature of the hazardous materials and terrorist incident threat; evolving incident strategies and operational techniques; and unpredictable team, expertise, and resource combinations during incident response.

Employer's Legal Responsibilities

OSHA 29 CFR 1910.120(q) and EPA 40 CFR 311 (EPA 311) require that emergency response employees be completely trained before they perform in emergencies. At a minimum, such training should include the elements of the emergency response plan, standard operating procedure (SOP's) established by the employer, and procedures for notification and handling of emergency incidents.

The employer must certify annually that each employee has successfully completed the required training. The method used to demonstrate competency for certification of training must be recorded and maintained by the employer. Important concepts to remember are:

- The chief or director is responsible for determining the appropriate level of training required based on actions required of members as stated in the SOP's.
- The chief or director is responsible for implementing the required training or certifying that members of the organization have the competencies required. Documentation of training is critical.
- OSHA 1910.120(q) rules apply to all individuals and agencies that are expected to respond to an emergency involving hazardous materials, that is, career or volunteer, fire, emergency medical services (EMS), or law enforcement personnel.

OSHA 1910.120(q) and EPA 311 apply to employers whose employees are engaged in emergency response to hazardous materials incidents. Employer responsibilities under these regulations fall into four primary areas:

- Development of an emergency response plan
- Development of specific procedures for handling hazardous materials incidents
- Training requirements
- Health and safety requirements (medical monitoring for the use of chemical protective clothing and exposure records)

Employers' Training Requirements

Employers must ensure that employees receive training in emergency response to hazardous materials incidents, based on their expected duties and functions. Such training must be performed before employees are permitted to perform in emergencies.

- An employer is responsible for determining the appropriate level of training required, based on actions expected of employees as stated in the agency's SOP's.
- An employer is responsible for implementing the required training. Emphasis should be on achieving the required competencies for the appropriate level of response rather than on minimal requirements for length of training.
- An employer is responsible for selecting qualified, competent instructors.
- An employer must provide annual refresher training sufficient to maintain competencies, or employees must demonstrate required competencies annually.
- An employer must maintain a record of demonstrated competencies including an explanation of how each competency was demonstrated. Training records must contain dates of training, student rosters, curriculum outlines, demonstration checklists or performance records and evaluation tools, and scores, if appropriate.

The Challenge of Competency

As part of a comprehensive program to protect the public and the environment from chemical incidents resulting from such occurrences as transportation accidents, spills, discharges from industrial operations, and terrorist or other criminal activity, training must be conducted for personnel who address planning, safety, response, and technical programs. Many personnel needing training related to hazardous materials and terrorist incident response are volunteers or part-time employees. Maintaining minimum competency levels for full-time paid staff may be difficult, but training part-time or volunteer responders is an even bigger challenge. Two of the most significant challenges are determining what constitutes a minimal level and ensuring minimal requirements are met. Another challenge is presented by part-time and volunteer responders' time constraints and limited flexibility to attend training.

No single generic course can fit the needs of all elements of the diverse national response audience. Although there are basic competencies, trainers must adjust material to suit police, fire, emergency medical service (EMS), public works, transportation, sanitation employees, and so forth. Training options must be offered accordingly, given these variations of need.

OSHA has defined the minimum number of hours for training at operations, technician, specialist, and incident commander levels. However, each employer is responsible for employees being trained to competency, and agencies often exceed the minimum hours of training to teach and test for competencies at the levels outlined by OSHA. The training needed to reach competency depends on the preexisting skills and experience of the trainees. Agencies frequently discover that training needs exceed the minimum required hours. On the other hand, employees of a response agency who have sufficient skills and experience may require minimal time to attain the competency level desired. An effective response is based on the competency of the responders, not the number of their training hours. At a minimum, employers should evaluate the amount of learning that resulted from the instruction.

Awareness

Operations
Core
Mission-Specific

Hazardous
Materials
Technician

Specialist
Employee

Hazardous
Materials
Specialist

Incident
Commander

Hazardous
Materials
Officer

Safety
Officer

BLS
Responder

ALS
Responder

Hospital
First
Receiver

Appendix A:
Related
Standards

Appendix B:
NIMS/ICS

Appendix C:
Special
Topics

OSHA is concerned that the knowledge and skills gained during initial hazardous materials training will be lost if refresher training is not provided. OSHA realizes that it will not take as many hours to cover the information in a review as during the initial presentation; therefore, there is no hour requirement for refresher training. It is up to the employer to determine that employees maintain their original competencies through refresher training. If it is determined that employees maintain their competency without refresher training, OSHA allows them to demonstrate this annually. If the employer decides to use demonstrated competencies instead of providing training, the employer must document how each employee demonstrated competency.