

HAZWOPER Emergency Response	Page 1
Absolute Pipeline Maintenance & Consulting Master Safety & Health Program	Rev. Rdate 6/2/2009

Applicable OSHA Standards: 29 CFR 1910.120

1. Scope & Purpose

- 1.1. Absolute Pipeline Maintenance & Consulting has developed this program to safely engage in Emergency Response Operations in the event of a release of hazardous waste. The company's objective is to train affected and authorized employees to the levels necessary for the specific hazardous waste operations (HAZWOPER) response assignment. This objective recognizes that such incidents, when not properly handled, can pose significant safety and health risks to employees, contractor personnel, host employers, the community and environment.

2. Introduction

- 2.1. Because of the potential seriousness of safety and health hazards in a HAZWOPER emergency, 29 CFR 1910.120 establishes minimum safety and health requirements to protect workers involved in the response.
- 2.2. The standard covers workers employed in cleanup operations at uncontrolled hazardous waste sites and EPA-licensed waste treatment; storage and disposal facilities; as well as workers responding to emergencies involving hazardous materials (e.g., spills).
- 2.3. With this program, the company has established requirements for: specialized levels of employee training based on the type and extent of HAZWOPER response; pre-planning and development of site-specific HAZWOPER response programs; utilization of safe work procedures in coordination with related company safety programs (i.e. Hazard Communications, Personal Protective Equipment, Respiratory Protection); and utilization of the Incident Command System (ICS) for managing an emergency response.
- 2.4. State, county, and municipal employees such as police, emergency medical personnel and firefighters with local departments will be covered by regulations issued by the 25 States operating their own OSHA-approved safety and health programs. EPA regulations will cover these employees in States without State plans. These regulations will meet or exceed OSHA requirements.
- 2.5. This program establishes company requirements for HAZWOPER emergency response and summarizes the steps necessary to protect the health and safety of employees and other personnel in these situations and environments.

3. Overview of Basic Program Components

- 3.1. Safe and effective HAZWOPER response requires development and implementation of a site-specific written safety and health program that identifies, evaluates, and controls safety and health hazards, and provides emergency response procedures for each hazardous waste site or treatment, storage, and disposal facility.

HAZWOPER Emergency Response	Page 2
Absolute Pipeline Maintenance & Consulting Master Safety & Health Program	Rev. Rdate 6/2/2009

- 3.2. This written program will include specific and detailed information on the following topics:
 - 3.2.1. An organizational work plan,
 - 3.2.2. Site evaluation and control,
 - 3.2.3. A site-specific program,
 - 3.2.4. Information and training program,
 - 3.2.5. Personal protective equipment program,
 - 3.2.6. Monitoring,
 - 3.2.7. Medical surveillance program,
 - 3.2.8. Decontamination procedures, and
 - 3.2.9. Emergency response
- 3.3. The written safety and health program is periodically updated and made available to all affected employees, contractors, subcontractors and authorized OSHA representatives.
- 3.4. The general contractor or host employer will inform contractors and subcontractors, or their representatives, of any identifiable safety and health hazards or potential fire or explosion hazards before they enter the work site.

4. Emergency Response Planning

- 4.1. Before any HAZWOPER emergency operations begin, a written emergency response plan will be developed and implemented to handle anticipated emergencies. The plan will be available for inspection and duplication by employees, their representatives and authorized OSHA representatives.
- 4.2. In situations when company employees are evacuated from the HAZWOPER danger area in an emergency situation and will not assist with or respond to the emergency, the emergency action plan developed to comply with 29 CFR 1910.38 will be sufficient.
- 4.3. In anticipation of potential chemical exposures to workers in such situations, the company has developed a *Medical Surveillance Program* in accordance with in-house safety and health procedures as well as OSHA requirements.
- 4.4. Response procedures include involving local authorities and emergency responders when required and as appropriate to the situation. As required, site operations

HAZWOPER Emergency Response	Page 3
Absolute Pipeline Maintenance & Consulting Master Safety & Health Program	Rev. Rdate 6/2/2009

management will notify the local fire department about what chemicals are routinely maintained at the work location and in what quantities.

- 4.5. The site Safety Representative is in charge of maintaining and implementing company HAZWOPER emergency response procedures for local operations. The corporate Safety Manager is in charge of overall management and implementation of HAZWOPER program components. This includes maintaining at the company main office records and documentations as required.
- 4.6. The written HAZWOPER Emergency Response Plan will include the following components:
 - 4.6.1. Pre-emergency planning and coordination with outside parties;
 - 4.6.2. Personnel roles, lines of authority, training and communication;
 - 4.6.3. How to recognize and prevent emergencies;
 - 4.6.4. Establishing safe distances and safe places for refuge;
 - 4.6.5. Site security and control procedures;
 - 4.6.6. Evacuation routes and personnel accountability procedures;
 - 4.6.7. Decontamination procedures;
 - 4.6.8. Emergency medical treatment and first aid provisions and procedures;
 - 4.6.9. Methods of communicating an emergency alert or alarm, as well as procedures for responding to an alert or alarm;
 - 4.6.10. Procedures for post-response critique and follow-up on recommendations; and
 - 4.6.11. Provisions and a procedure for proper selection and use of PPE and emergency equipment.
- 4.7. The senior emergency response official responding to an emergency will take charge of a site-specific Incident Command System (ICS). All emergency responders and their communications will be coordinated and controlled through the individual in charge of the ICS assisted by the senior official present for the company and host employer (as applicable).
- 4.8. For purposes of this program the "senior official" at a HAZWOPER emergency response means the most senior official at the scene who has responsibility for controlling site operations. Initially, it is the senior officer on the first responding emergency unit due to arrive on the incident scene. As more senior officers arrive

HAZWOPER Emergency Response	Page 4
Absolute Pipeline Maintenance & Consulting Master Safety & Health Program	Rev. Rdate 6/2/2009

(i.e. , battalion chief, fire chief, state law enforcement official, site coordinator, etc.) the position is passed up the line of authority as previously established.

5. Employee HAZWOPER Training

- 5.1. Emergency response employees will properly trained before they are assigned to work in an actual emergency. This training will include:
 - 5.1.1. Components of the emergency response plan;
 - 5.1.2. Standard operating procedures established for the emergency response assignment;
 - 5.1.3. Proper selection and use of personal protective equipment (PPE) required for the assignment; and
 - 5.1.4. Specific procedures applicable to handling HAZWOPER emergencies.
- 5.2. Employees will be trained to the level necessary for the specific responsibilities assigned to them in a HAZWOPER emergency. This acknowledges that some personnel may be trained and assigned to be first responders only, where other personnel may be trained to a higher level for assignments involving control and clean-up operations.
- 5.3. No employee will attempt to perform a HAZWOPER emergency response duty unless they have been trained to the level required by OSHA for such an assignment.
- 5.4. First responders will receive sufficient awareness training to recognize that a HAZWOPER emergency situation exists and notify fully-trained response personnel about the emergency. First responders will not attempt control or clean-up activities for which they are not trained.
- 5.5. Arrangements may be made in advance for an outside fully-trained HAZWOPER emergency response service to respond within a reasonable time to perform control and clean-up activities. In this case, first responders will call the designated outside HAZWOPER emergency response service for assistance.
- 5.6. The company will certify in writing that each employee assigned to HAZWOPER duties has attended and successfully completed the required training. Training records and certifications will be maintained by the company Safety Manager at the company's main office.
- 5.7. Training will be based on the duties and functions of each responder in a HAZWOPER emergency situation. Training at the skill and knowledge level required for the employee's HAZWOPER assignment will be successfully completed prior to the employee's assignment to an actual response.

HAZWOPER Emergency Response	Page 5
Absolute Pipeline Maintenance & Consulting Master Safety & Health Program	Rev. Rdate 6/2/2009

5.8. Levels of HAZWOPER responder training are:

5.8.1. *First responder awareness level.* Awareness Level First Responder training is for employees who are likely to witness or discover a hazardous substance release. They will be trained to initiate an emergency response sequence by notifying proper authorities and then take no further action. First responders will demonstrate competency in:

5.8.1.1. Understanding of what hazardous substances are, and risks associated with this type of incident;

5.8.1.2. Understanding of possible outcomes of a HAZWOPER emergency;

5.8.1.3. Ability to recognize the presence of hazardous substances in an emergency;

5.8.1.4. Ability to identify hazardous substances when possible;

5.8.1.5. Understanding of the first responder's awareness level role in accordance with the company and site-specific plan, as well as the U.S. Department of Transportation's Emergency Response Guidebook; and

5.8.1.6. Ability to realize when additional resources are needed and to make calls in accordance with procedures in place for emergency notifications.

5.8.2. *First responder operations level.* Operations Level First Responder training is for employees who will respond to HAZWOPER emergencies to protect nearby persons, property or the environment from the release. They will be trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures. First responders at the operations level will have at least eight hours training or sufficient experience to demonstrate competency in awareness-level requirements and the following:

5.8.2.1. Have knowledge of basic hazard and risk assessment techniques;

5.8.2.2. Know how to select and use proper PPE as required for operations level duties;

5.8.2.3. Understand basic hazardous materials terms;

HAZWOPER Emergency Response	Page 6
Absolute Pipeline Maintenance & Consulting Master Safety & Health Program	Rev. Rdate 6/2/2009

- 5.8.2.4. Know how to perform basic control, containment and/or confinement operations within capabilities of resources and PPE available;
 - 5.8.2.5. Know how to implement basic decontamination procedures; and
 - 5.8.2.6. Understand HAZWOPER standard operating and termination procedures.
- 5.8.3. *Hazardous materials technician.* Hazardous materials technicians respond to releases or potential releases to stop the release. This is a more aggressive role than the Operations Level First Responder because the technician must be able to approach the point of release and plug, patch or otherwise stop it. Hazardous materials technicians will have at least 24 hours of training equal to the first responder operations level and, additionally, be competent in the following:
- 5.8.3.1. Know how to implement the company's emergency response plan;
 - 5.8.3.2. Know how to classify, identify and verify known and unknown materials by using field survey instruments and equipment;
 - 5.8.3.3. Be able to function under the Incident Command System in an assigned role;
 - 5.8.3.4. Know how to select and use specialized personal protective equipment for chemical exposures as provided to the hazardous materials technician;
 - 5.8.3.5. Understand hazard and risk assessment techniques;
 - 5.8.3.6. Be able to perform advance control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available with the unit;
 - 5.8.3.7. Understand and implement decontamination procedures;
 - 5.8.3.8. Understand termination procedures;
 - 5.8.3.9. Understand basic chemical and toxicological terminology and behavior.
- 5.8.4. *Hazardous materials specialist.* Hazardous materials specialists respond with and provide support to hazardous materials technicians. Their duties are the same as the hazardous materials technician but require a more directed or specific knowledge of the materials they are called upon to contain. The hazardous materials specialist also serves as site liaison with

HAZWOPER Emergency Response	Page 7
Absolute Pipeline Maintenance & Consulting Master Safety & Health Program	Rev. Rdate 6/2/2009

federal, state, local and other government authorities regarding the HAZWOPER event. Hazardous materials specialists will have successfully completed at least 24 hours of training equal to the technician level, and also be competent in the following areas:

- 5.8.4.1. Know how to implement the local or site-specific emergency response plan;
 - 5.8.4.2. Know the state emergency response plan;
 - 5.8.4.3. Understand classification, identification and verification of known and unknown chemicals from the release by using advanced survey instruments and equipment;
 - 5.8.4.4. Be able to select and use proper specialized chemical personal protective equipment as required for hazardous materials specialist duties;
 - 5.8.4.5. Understand in-depth hazard and risk techniques;
 - 5.8.4.6. Be able to perform specialized control, containment, and/or confinement operations within capabilities and PPE that is available;
 - 5.8.4.7. Be able to determine and implement decontamination procedures;
 - 5.8.4.8. Be able to develop a site-specific safety and control plan;
 - 5.8.4.9. Understand chemical, radiological and toxicological terminology and behavior.
- 5.8.5. *On scene incident commander.* Incident commanders, who will assume control of the incident scene beyond the first responder awareness level, will successfully complete at least 24 hours of training equal to the first responder operations level, and in addition be competent in the following:
- 5.8.5.1. Know and be able to implement the company's incident command system;
 - 5.8.5.2. Know how to implement the company's emergency response plan;
 - 5.8.5.3. Know and understand the hazards and risks associated with employees working in chemical protective clothing;
 - 5.8.5.4. Know how to implement the local emergency response plan;

HAZWOPER Emergency Response	Page 8
Absolute Pipeline Maintenance & Consulting Master Safety & Health Program	Rev. Rdate 6/2/2009

- 5.8.5.5. Know about the state emergency response plan and the Federal Regional Response Team; and
- 5.8.5.6. Know and understand the importance of decontamination procedures.
- 5.9. Trainers who provide any of the levels of HAZWOPER training as explained above will successfully complete a training course in preparation for teaching each of the subjects they are expected to teach. These kinds of courses are available from the U.S. National Fire Academy and other accredited or qualified providers.
- 5.10. Employees who successfully complete HAZWOPER training will also complete annual refresher training to remain adequately trained for performance of their assigned duties. Refresher training will have sufficient content and duration to maintain the competencies of participants. As an alternative, HAZWOPER-trained employees may demonstrate their competencies in a manner accepted by the company at least annually.
- 5.11. The company Safety Manager will keep a written record of individual training and certifications, and maintain these documentations at the main office.

6. Medical Surveillance

- 6.1. HAZWOPER emergency response employees will be covered by and involved in a medical surveillance in accordance with company and OSHA requirements.
- 6.2. Medical surveillance will be established for the following:
 - 6.2.1. Employees who are or may be exposed to hazardous substances or health hazards, at or above the OSHA permissible exposure limit (PEL), above the published exposure levels for these substances, without regard to the use of respirators, for 30 days or more a year;
 - 6.2.2. Employees who wear a respirator for 30 days or more a year, or as a requirement of the company's written *Respiratory Protection* program;
 - 6.2.3. Employees who are injured, become ill or develop signs or symptoms due to possible overexposure involving hazardous substances, or health hazards resulting from an emergency response or hazardous waste operation; and
 - 6.2.4. Employees who are members of a HAZMAT team.
- 6.3. HAZMAT team members and hazardous materials specialist will receive a baseline physical examination and be provided with medical surveillance as required.
- 6.4. If an emergency response employee shows signs or symptoms that may be associated with exposure to hazardous substances during an emergency incident,

HAZWOPER Emergency Response	Page 9
Absolute Pipeline Maintenance & Consulting Master Safety & Health Program	Rev. Rdate 6/2/2009

either immediately or subsequently, he or she will be provided with medical consultation as required.

HAZWOPER Emergency Response	Page 10
Absolute Pipeline Maintenance & Consulting Master Safety & Health Program	Rev. Rdate 6/2/2009

7. Chemical protective clothing

- 7.1. Chemical protective clothing and equipment to be used by HAZMAT team members and hazardous materials specialists.
- 7.2. Such PPE will comply with the following:
 - 7.2.1. Use of PPE will be in compliance with the company's written *Personal Protective Equipment* safety program.
 - 7.2.2. A site-specific personal protective equipment program will also be established as required. It will be made part of the site-specific safety and health plan.
 - 7.2.3. The site-specific PPE program will address the following components. (In the event that instructions are provided by an equipment manufacturer, these written instructions do not need to be rewritten into the site-specific plan.):
 - 7.2.3.1. PPE will be selected based upon evaluation of site hazards;
 - 7.2.3.2. Use and limitations of PPE;
 - 7.2.3.3. Schedule and duration of the HAZWOPER work;
 - 7.2.3.4. Proper storage and maintenance of PPE;
 - 7.2.3.5. Decontamination and disposal of PPE;
 - 7.2.3.6. Training, proper selection, use and fitting of PPE;
 - 7.2.3.7. PPE donning and doffing procedures;
 - 7.2.3.8. Procedures for inspecting PPE before and after use;
 - 7.2.3.9. Evaluation of PPE program effectiveness; and
 - 7.2.3.10. Limitations during temperature extremes, heat stress and other appropriate medical considerations.
 - 7.2.4. Totally-encapsulating suits will protect employees from specific hazards that are identified during site characterization and analysis.
 - 7.2.5. Totally-encapsulating suits will be capable of maintaining positive air pressure and preventing inward test gas leakage of more than 0.5 percent.

HAZWOPER Emergency Response	Page 11
Absolute Pipeline Maintenance & Consulting Master Safety & Health Program	Rev. Rdate 6/2/2009

8. Post-emergency response operations

- 8.1. When HAZWOPER operations are completed and it is necessary to remove from the site any hazardous substances, health hazards and contaminated materials, this will be done in accordance with this program and OSHA requirements.
- 8.2. If clean-up is done at the work location by employees, they will be trained in accordance with: 29 CFR 1910.38, 1910.134, 1910.1200, and other appropriate safety and health training as required for the tasks.