

## **8. TRAINING AND EXERCISES**

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### **8.1 PURPOSE**

This chapter provides details of the training standards for various response personnel, and a general schedule for exercising the plan as a response organization.

Emergency preparedness is a continuous process with these integral functions:

- Planning
- Training
- Exercising
- Lessons learned

## **8.2 SCOPE**

All personnel involved in oil spill response operations where they may come into direct contact with the spilled product, and/or enter the exclusion zone, must have an appropriate level of OSHA/WISHA required training. Safety regulations are strictly enforced by federal and state authorities. A summary of the various training levels is contained in Section 8.8.

NRC will ensure that their employees and subcontractors meet the applicable OSHA/WISHA training requirements and safety standards. State and Federal OSCs are responsible for ensuring that their respective agency personnel meet the applicable OSHA/WISHA training requirements and safety standards. The Unified Command, as represented by the designated Command Staff Safety Officer, is ultimately responsible to ensure that all personnel on scene comply with applicable OSHA/WISHA regulations.

## **8.3 LAWS AND REGULATIONS**

Numerous federal requirements related to oil spill response are contained in OSHA. See 29 CFR 1910.120 for details. Washington State WISHA regulations regarding Hazardous Waste Operations and Emergency Response have been codified in WAC 296-62-300 and WAC 296-824-100.

## **8.4 RIGHT TO KNOW (Hazard Communication)**

The Right to Know occupational safety and health standard is intended to comprehensively address the issue of evaluating the potential hazards of chemicals, and communicating information concerning hazards including appropriate protective measures to employees. Each organization must develop and maintain a written hazard communication program for the workplace, including lists of hazardous chemicals present, labeling of containers of chemicals in the workplace, as well as containers of chemicals being shipped; the distribution of safety data sheets to employees, and the development and implementation of employee training programs regarding hazards of chemicals and protective measures.

## **8.5 STANDARDS FOR RESPONSE PERSONNEL**

Under the OSHA regulation in 29 CFR 1910.120, Hazardous Waste Operation and Emergency Response, this rule regulates the safety and health of employees involved in clean-up operations at:

1. "Uncontrolled" hazardous waste sites, i.e. sites specified as superfund removal and remediation sites, RCRA corrective action sites and other operations required by federal or state law.
2. Treatment, storage and disposal (TSD) facilities.
3. Emergency responses to releases, or threats of releases.

Program and training requirements vary for each category. For the purpose of oil spill response personnel and operational training the following material will focus on the training requirements for emergency responses to releases or threats of releases, under 29 CFR 1910.120.

Pursuant to 29 CFR 1910.120(e), all employees working on site (such as, but not limited to, equipment operators, general laborers and others) exposed to hazardous substances, health hazards, or safety hazards, and their supervisors and management responsible for the site, shall receive training that meets the requirements of this paragraph before they are permitted to engage in hazardous waste operations that could expose them to hazardous substances, safety, or health hazards. Employees shall not be permitted to participate in or supervise field or command post activities until they have been trained to a level required by their job function and responsibility.

The training shall thoroughly cover the following:

1. Names of personnel and alternates responsible for site safety and health;
2. Safety, health and other hazards present on the site;
3. Use of personal protective equipment;
4. Work practices by which the employee can minimize risks from hazards;
5. Safe use of engineering controls and equipment on the site;
6. Medical surveillance requirements, including recognition of symptoms and signs which might indicate overexposure to hazards; and
7. The contents of the site safety and health plan.

Reference: Additional safety training guidelines are provided in ASTM Standards F1656-01 and F1644-01.

In addition to this important safety and health training, the NRC Spill Management Team will have the appropriate ICS training, training in NWACP policy, use and location of GRPs (if appropriate) and in the NRC Plan. This training is outlined in Table 2-1 in Chapter 2.

New employees will receive the training required by WAC 173-182-280(2) before being assigned job responsibilities which require participation in an emergency situation.

## **8.6 EMERGENCY RESPONSE TO HAZARDOUS SUBSTANCES**

All employers and employees engaged in emergency response to hazardous substance releases are subject to the full requirements of 29 CFR 1910.120(q), except those involved in clean-up operations at uncontrolled hazardous waste sites, sites covered by RCRA, or TSD facilities.

## **8.7 ELEMENTS OF AN EMERGENCY RESPONSE PLAN**

Employers are responsible for developing an emergency response plan for emergencies which should address the following, as a minimum, to the extent that they are not addressed elsewhere:

1. Pre-emergency planning and coordination with outside parties
2. Personnel roles, lines of authority, training, and communication
3. Emergency recognition and prevention
4. Safe distances and places of refuge
5. Site security and control
6. Evacuation routes and procedures
7. Decontamination
8. Emergency medical treatment and first aid

9. Emergency alerting and response procedures
10. Critique of response and follow-up
11. Personal Protective Equipment (PPE) and emergency equipment
12. Emergency response organizations

Training shall be based on the duties and functions to be performed by each responder of an emergency response organization. The skills and knowledge levels required for responders shall be conveyed through training before responders are permitted to take part in actual emergency operations or incident.

## **8.8 SPECIFIC TRAINING LEVELS**

### **8.8.1 First Responder Awareness Level**

First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They would take no further action beyond notifying the authorities of the release. First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas:

- An understanding of what hazardous materials are, and the risks associated with them in an incident
- An understanding of the potential outcomes associated with an emergency created when hazardous materials are present
- The ability to recognize the presence of hazardous materials in an emergency
- The ability to identify the hazardous materials, if possible
- An understanding of the role of the first responder awareness individual in the employer's emergency response plan including site security and control and the U.S. Department of Transportation's Emergency Response Guidebook
- The ability to realize the need for additional resources, and to make appropriate notifications to the communication center

**Training Time: not specified**

### **8.8.2 First Responder Operations**

First responders at the operations level are individuals who respond to releases or potential releases of hazardous substances as part of the initial responses to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are 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 exposure. First responders at the operations level shall receive training or demonstrate competency in the areas listed for the awareness level in addition to:

- Knowledge of the basic hazard and risk assessment techniques
- Know how to select and use proper personal protective equipment provided to the first responder operational level
- An understanding of basic hazardous materials terms

- Know how to perform basic control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available with their unit
- Know how to implement basic decontamination procedures
- An understanding of the relevant standard operating procedures and termination procedures

**Training Time: 8 hours**

### **8.8.3 Hazardous Materials Technicians, 29 CFR 1910.120(q)(6)(iii)**

Hazardous materials technicians are individuals who respond to releases or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance. Hazardous materials technicians shall have received at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas and the employer shall so certify:

- Know how to implement the employer's emergency response plan
- Know the classification, identification and verification of known and unknown materials by using field survey instruments and equipment
- Be able to function within an assigned role in the Incident Command System
- Know how to select and use proper specialized chemical personal protective equipment provided to the hazardous materials technician
- Understand hazard and risk assessment techniques
- 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
- Understand and implement decontamination procedures
- Understand termination procedures
- Understand basic chemical and toxicological terminology and behavior

**Training Time: 24 hours**

### **8.8.4 On-Scene Incident Commander, 29 CFR 1910.120(q)(6)(v)**

Incident Commanders, who will assume control of the incident scene beyond the first responder awareness level, shall receive at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas and the employer shall so certify:

- Know and be able to implement the employer's incident command system
- Know how to implement the employer's emergency response plan
- Know and understand the hazards and risks associated with employees working in chemical protective clothing
- Know how to implement the local emergency response plan
- Know of the state emergency response plan and of the Federal Regional Response Team
- Know and understand the importance of decontamination procedures

**Training Time: 24 hours**

### **8.8.5 Refresher Training, 29 CFR 1910.120(q)(8)(i)**

Individuals who are trained in accordance with 29 CFR 1910.120(q)(6) shall receive annual refresher training of sufficient content and duration to maintain their competencies in these areas at least yearly.

### **8.8.6 Spill Management Team Training WAC 173-182-280 (2)**

Spill Management Team members will receive at minimum, yearly refresher training on ICS, NWACP Polices, the use and location of GRPs, contents of the NRC Plan, and the health and safety of workers. The training will be part of the annual exercise program. All new SMT members will complete the training program prior to having responsibilities assigned in an emergency response situation.

## **8.9 TRAINING EXERCISES UNDER 29 CFR 1910.120(q)**

OSHA has included several exceptions to the emergency response standard whereby workers can be qualified to work in emergency response incidents.

### **8.9.1 Skilled Support Personnel, 29 CFR 1910.120(q)(4)**

Personnel, not necessarily an employer's own employees, who are skilled in the operation of certain equipment, such as mechanized earth moving or digging equipment or crane moving or digging equipment or crane and hoisting equipment, and who are needed temporarily to perform immediate emergency support work that cannot reasonably be performed in a timely fashion by an employer's own employees, and who will be or may be exposed to the hazards at an emergency response scene, are not required to meet the training in this paragraph for the employer's regular employees. However, these personnel shall be given an initial briefing at the site prior to their participation in any emergency response. The initial briefing shall include instruction in the wearing of appropriate personal protective equipment, what chemical hazards are involved, and what duties are to be performed. All other appropriate safety and health precautions provided to the employer's own employees shall be used to assure the safety and health of these personnel.

### **8.9.2 Specialist Employee, 29 CFR 1910.120(q)(5)**

Employees who, in the course of their regular job duties, work with and are trained in the hazards of specific hazardous substances, and who will be called upon to provide technical advice or assistance at a hazardous substance release incident to the individual in charge, shall receive training or demonstrate competency in the area of their specialization annually.

### **8.9.3 Post Emergency Response Cleanup**

For oil spill cleanup where cleanup is that portion of the emergency response after the immediate threat of a release has been stabilized or eliminated and cleanup of the site has begun, a minimum of 4-hours training is considered adequate. Post-emergency low hazard training requires that:

- Cleanup is performed in a fully characterized area of low hazard
- Health risks from skin absorption are minimal
- Employees have completed Hazard Communication training in 29 CFR 1910.38(a) and 1910.1200
- Employees have received site specific training in operating procedures, decon procedures, water safety, hypothermia, heat stress, and safety hazard controls
- Supervisors meet the requirements of 29 CFR 1910.120(e)(4)

#### **8.9.4 Post Emergency Response Operations, 29 CFR 1910.120(q)(1)**

Upon completion of the emergency response, if it is determined that it is necessary to remove hazardous substances, health hazards, and materials contaminated with them (such as contaminated soil or other elements of the natural environment) from the site of the incident, the employer conducting the clean-up shall comply with one of the following:

1. Meet all of the requirements of paragraphs (b) through (o) of 29 CFR 1910.120, or
2. Where the cleanup is done on plant property using plant or workplace employees, such employees shall have completed the training requirements of the following: 29 CFR 1910.38(a); 1910.134; 1910.1200, and other appropriate safety and health training made necessary by the tasks that they are expected to perform such as personal protective equipment and decontamination procedures.

All equipment to be used in the performance of the cleanup work shall be in serviceable condition and must be inspected prior to use.

#### **8.9.5 General Site Workers, 29 CFR 1910.120(e)(3)**

General site workers (such as equipment operators, general laborers and supervisory personnel) engaged in hazardous substance removal or other activities which expose or potentially expose workers to hazardous substances and health hazards shall receive a minimum of 40 hours of instruction off the site, and a minimum of three days actual field experience under the direct supervision of a trained, experienced supervisor. This category of training also applies to any non-general site workers required to wear a respirator, pursuant to 29 CFR 1910.120(e)(3)(iv). Training Time: 40 hours plus 3 days field experience

#### **8.9.6 Management and Supervisors, 29 CFR 1910.120(e)(4)**

On-site management and supervisors directly responsible for, or who supervise employees engaged in, hazardous waste operations shall receive 40 hours initial training, and three days of supervised field experience (the training may be reduced to 24 hours and one day if the only area of their responsibility is employees covered by 29 CFR 1910.120(e)(3)(ii) and (iii) and at least eight additional hours of specialized training at the time of job assignment on such topics as, but not limited to, the employer's safety and health program and the associated employee training program, personal protective equipment program, spill containment program, and health hazard monitoring procedure and techniques.

### **8.9.7 Annual Refresher, 29 CFR 1910.120(e)(11.9.7.8)**

For all employees (such as but not limited to equipment operators and general laborers) exposed to hazardous substances, health hazards, or safety hazards, and on-site managers and supervisors directly responsible for or who supervise employees engaged in hazardous waste operations.

### **8.9.8 Equivalent Training, 29 CFR 1910.120(e)(9): WAC 296-62- 3040(9).**

OSHA and WISHA regulations permit employers who can show by an employee's work experience and / or training that the employee has had initial training equivalent to that required, shall be considered as meeting those initial training requirements.

## **8.10 EXERCISING THE NRC PLAN PRC**

### **8.10.1 Testing Internal Notification Procedures**

NRC shall test and document internal notification procedures at least once every 90 days. This involves those organizational elements listed in Chapter 3 (Spill Response Organization). Such tests are only required to involve notification, not actual deployment. Typically one annual notification will be done outside of normal business hours. Notifications completed for actual spill response may be used in compliance with notification test procedures, provided they are properly documented using the notification log.

### **8.10.2 Annual Exercises**

NRC commits to Washington State's drill program for the NRC Plan. NRC also commits to working closely with Ecology to design drill scenarios and ensure drill requirements are met. NRC will conduct and document one table-top or incident command post exercise and two deployment exercises per year. NRC also commits to a triennial deployment of wildlife equipment and an ERTV call, per WAC 173-182-710. These drills will be conducted on a triennial cycle following the Washington drill program guidelines. One WCS scenario shall be exercised during the triennial cycle. NRC will conduct post-spill reviews following drills to capture lessons learned, identify training needs and any revisions needed to improve the NRC Plan. NRC will utilize a systematic approach over time to involve all SMTs listed in NRC Plan Covered Vessel Data Forms in tabletops and deployments.

Response to actual spills may be used in part as credit for spill exercises. In such cases, NRC will provide a letter requesting drill credit and any needed supporting documentation to Ecology.