

HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE

1.0 Objective

The objective of this surveillance is to ensure that workers who are performing activities associated with characterizing, handling, processing, storing or transporting hazardous wastes are adequately protected. The surveillance also evaluates the effectiveness of programs implemented to protect the health and safety of emergency response personnel who may be called upon to mitigate upset conditions at the laboratory where hazardous waste operations are conducted. Finally, the surveillance includes evaluations of the laboratory's compliance with specific requirements regarding hazardous waste operations and emergency response.

2.0 References

- 2.1 DOE O 440.1A, *Worker Protection Management for DOE Federal and Contractor Employees*
- 2.2 DOE 5480.4, *Environmental Protection, Safety and Health Protection Standards*
- 2.3 29 CFR 1910.120, *Hazardous Waste Operations and Emergency Response*

3.0 Surveillance Activities

The Facility Representative or Environmental, Safety, and Health Support Specialist completes three activities in this surveillance to evaluate the protection of worker health and safety during both hazardous waste operations and possible emergency response activities. In order for the Facility Representative or Environmental, Safety, and Health Support Specialist to complete this surveillance, the Facility Representative's or Environmental, Safety, and Health Support Specialist's HAZWOPER training must be current.

- Activity 1 - Observe routine activities at a hazardous waste operations site.
- Activity 2 - Examine the readiness of Emergency Response personnel to cope with an accident or operational event.
- Activity 3 - Interview hazardous waste activities workers.

Surveillance Guideline

HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE

Surveillance No.: _____

Facility: _____

Date Completed: _____

YES NO N/A

Activity 1 - Observe Hazardous Waste Activities

- | | | | | |
|----|--|-------|-------|-------|
| 1. | Has a site health and safety plan (HASP) been developed and is a copy of the plan available at the work site? | _____ | _____ | _____ |
| 2. | Does the safety and health plan include the following elements: | | | |
| | • Description of hazards present including the characteristics of the toxic materials or hazardous wastes known or suspected at the site? | _____ | _____ | _____ |
| | • Requirements for entry to the site including personal protective equipment? | _____ | _____ | _____ |
| | • Medical surveillance requirements to track exposure to toxic materials? | _____ | _____ | _____ |
| | • Personnel to contact in the event of an emergency? | _____ | _____ | _____ |
| | • Methods to contact emergency response personnel in case of a spill, accident or operational event? | _____ | _____ | _____ |
| | • Worksite procedures to minimize the potential for exposure of personnel to hazardous materials? | _____ | _____ | _____ |
| | • Requirements for monitoring and air sampling to detect the presence of hazardous materials? | _____ | _____ | _____ |
| 3. | Is the entry to the hazardous waste operations area controlled to prevent entry of personnel without adequate training or without appropriate personal protective equipment? | _____ | _____ | _____ |

4. Are boundaries and barriers around the hazardous waste

operations area posted to notify personnel of the potential hazards? _____

Surveillance Guideline
HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE (cont.)

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
5. Are personnel entering the hazardous waste operations area wearing the required personal protective equipment?	_____	_____	_____
6. Are personnel wearing the personal protective equipment correctly?	_____	_____	_____
7. Have personnel who are using respiratory protection been properly fit tested?	_____	_____	_____
8. Are the worksite conditions as described in the safety and health plan?	_____	_____	_____
9. Is monitoring for potential hazardous substances performed as mandated by the safety and health plan?	_____	_____	_____
10. Are instruments used for monitoring appropriate, based on sensitivity, response time, and design?	_____	_____	_____
11. Are instruments used to perform monitoring within their current calibration?	_____	_____	_____
12. For selected personnel performing hazardous waste operations:			
• Do training records substantiate that they have received 40 hours of classroom training or offsite instruction and three days of actual field experience under direction of a trained, experienced supervisor?	_____	_____	_____
• Do medical records substantiate that the employee received a complete physical examination before beginning the work?	_____	_____	_____
• Are records maintained of the individual's exposure to hazardous materials?	_____	_____	_____

13. Do training records substantiate that the onsite manager or supervisor has received 40 hours of HAZWOPER instruction, three days field experience, and at least eight additional hours of specialized training in supervising hazardous waste activities? _____

Surveillance Guideline
HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE (cont.)

YES NO N/A

- | | | | | |
|-----|--|-------|-------|-------|
| 14. | Are workers at the hazardous waste operations site complying with procedures specified in the safety and health plan? | _____ | _____ | _____ |
| 15. | Was a pre-job briefing conducted before beginning new activities? | _____ | _____ | _____ |
| 16. | Are procedures established and used for decontamination of equipment and personal protective equipment before they are removed from the hazardous waste operations area? | _____ | _____ | _____ |
| 17. | Is equipment available and operable so that workers can contact emergency response personnel, if necessary? | _____ | _____ | _____ |

Activity 2 - Emergency Response Capability

- | | | | | |
|-----|--|-------|-------|-------|
| 18. | Do emergency response personnel have ready access to information identifying the possible hazards at the hazardous waste operations site? | _____ | _____ | _____ |
| 19. | Do training records substantiate that personnel who may respond to hazardous waste emergencies have received required supplementary training? | _____ | _____ | _____ |
| 20. | Is adequate personal protective equipment, including respiratory equipment, available to personnel who may have to respond to hazardous waste emergencies? | _____ | _____ | _____ |
| 21. | Have personnel who may be called upon to respond to | _____ | _____ | _____ |

ardous waste emergencies received required

medical/physical examinations?

22. Do emergency response personnel have adequate equipment to cope with fires at hazardous waste operations sites?

Surveillance Guideline

HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE (cont.)

23. Do emergency response personnel have adequate equipment to cope with spills of hazardous materials?

Activity 3 - Interview Hazardous Waste Activities Workers

CAUTION

Facility Representatives or Environmental, Safety, and Health Support Specialists should avoid interrupting hazardous waste activities workers in their work. The Facility Representative or Environmental, Safety, and Health Support Specialist should wait for opportune times to transact business.

YES

NO

N/A

24. Can personnel describe the hazards present at the work site?

25. Do personnel know who to contact in the event of an emergency?

26. Do personnel know how to respond to a spill of hazardous materials?

27. Can personnel describe procedures to be followed if they believe an unexpected increase in the concentration of hazardous materials has occurred?

28. Do personnel know:

- Who their supervisor is? _____
- Who the site safety and health officer is? _____
- Who the contractor project manager responsible for their work is? _____

Surveillance Guideline
HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE (cont.)

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
29. Do personnel know under what conditions they would need to report to medical for additional screening?	_____	_____	_____

(Workers should be able to respond that they should report to medical following any unanticipated exposure to potentially unknown hazardous materials)

OTHER:

_____	_____	_____	_____

_____	_____	_____	_____

_____	_____	_____	_____

NOTES/COMMENTS:

Surveillance Guideline
HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE (cont.)

PERSONNEL CONTACTED: _____

**IF MORE SPACE IS NEEDED FOR FINDINGS, OBSERVATIONS, AND FOLLOWUP
ITEMS - USE ADDITIONAL SHEETS**

FINDINGS:

Finding No.: _____

Description: _____

Finding No.: _____

Description: _____

Surveillance Guideline
HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE (cont.)

Finding No.: _____

Description: _____

OBSERVATIONS:

Observation No.: _____

Description: _____

Observation No.: _____

Description: _____

Surveillance Guideline
HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE (cont.)

Observation No.: _____

Description: _____

FOLLOWUP ITEMS:

Followup Item No.: _____

Description: _____

Followup Item No.: _____

Description: _____

Surveillance Guideline
HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE (cont.)

Followup Item No.: _____

Description: _____

LABORATORY MANAGEMENT DEBRIEFED AND RESULTS: _____

Signature: _____ Date: _____

Facility Representative or
Environmental, Safety, and Health Support Specialist