**Using this Template**

The following template can be used to help your organization develop a written Hazardous Waste Operations and Emergency Response Program (HAZWOPER). This template **cannot** be used as is – you must customize the template to meet the needs of your organization and your state laws. We have made this template easy for you to customize by adding visual prompts that identify where your input is needed. These are identified by yellow highlighted, red text in the template. You may also change any of the text in the template to meet your organization’s needs – for example, department names, job titles and listed responsibilities and procedures.

*Example:*

<COMPANY NAME>

HAZWOPER Program (Emergency Response)

becomes

XYZ Company

HAZWOPER Program (Emergency Response)

To remove the colored highlighting from your text, left click and drag your mouse over the yellow text and click on the highlighter button from the Font menu. To change the font color to black, select the text and click on the font color button.



To aid you in understanding the need to customize your program, several “Check Your Understanding” text boxes are also included throughout the template. After reading the information in the text box and adding the required information into the template, you may simply right click on the cross arrow box and select “cut.”

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| **Disclaimer.** This sample safety program template cannot be used as is. You must customize the template to meet the needs of your organization. EMC does not guarantee that this template is or can be relied on for compliance with any law or regulation, assurance against preventable losses, or freedom from legal liability. We make no representations or warranties of any kind whatsoever, either express or implied, in connection with the use of this template. EMC will not be liable for your use of the template as customized by you. All safety programs and policies, including this template and the information you supply to complete it, should be reviewed by your legal counsel and/or risk management staff. |

**<COMPANY NAME>**

**HAZWOPER Program (Emergency Response)**

|  |  |  |  |  |  |  |  |  |  |  |
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| ***Check Your Understanding.*** Do you need a Hazardous Waste Operations and Emergency Response (HAZWOPER) program? You need a HAZWOPER program if:

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| * Your organization performs or has the potential to perform cleanup operations for hazardous materials
 |
| * Your organization operates a transfer, storage and disposal facility (TSDF)
 |
| * Your organization engages in or has the potential to engage in emergency response involving the release of a hazardous substance
 |

If your organization is a conditionally exempt, small quantity generator of hazardous waste or otherwise exempt from the Resource Conservation and Recovery Act (RCRA), you are not required to have a HAZWOPER program.***A HAZWOPER program is not needed if the hazardous substance can be absorbed, neutralized or controlled at the time of the release by those in the immediate area or by maintenance personnel, and the substance does not pose a significant safety or health hazard to employees.*** For example, if a pint-sized container of gasoline was released, emergency response may not be needed. However, if chlorine gas was released at an amount above the immediately dangerous to life or health (IDLH) level, the situation would be covered within a HAZWOPER program and emergency response would be needed. The most common category of operations covered by HAZWOPER programs are emergency response operations for the release, or substantial threat of release of hazardous substances. This includes post-emergency response operations, such as performing any necessary cleanup activities. ***This document will focus on preparing a HAZWOPER program for organizations engaged in emergency response operations involving the release(s) of a hazardous substance(s)***. If you have employees engaged in cleanup operations or operate a TSDF, or handle hazardous waste you should contact EMC Loss Control for additional assistance with developing your HAZWOPER program.In order to successfully implement a HAZWOPER program, your organization will need a number of other written programs already in place. Prior to developing this program, make sure you have the following written programs:

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| --- |
| * [A Hazard Communication Program](https://www.emcins.com/ICEFiles/docs/lossControl/haz-com.docx)
 |
| * [A Personal Protective Equipment Program](https://www.emcins.com/ICEFiles/docs/lossControl/PPE.docx)
 |
| * [An Emergency Action Plan](http://www.google.com/url?sa=t&rct=j&q=&esrc=s&frm=1&source=web&cd=1&cad=rja&uact=8&sqi=2&ved=0CCkQFjAA&url=http%3A%2F%2Fwww.cdc.gov%2Fniosh%2Fdocs%2F2004-101%2Femrgact%2Femrgact.doc&ei=swZpU5WxOMfI8gG4zIAo&usg=AFQjCNGSitTRIx-DDCFvepP0O5L8dzjAYQ&sig2=MXTBbE4eVmK2mT6_QCZdJg&bvm=bv.66111022,d.b2U)
 |

Depending on your operations you may also need:

|  |
| --- |
| * A Hearing Conservation Program
 |
| * A Respiratory Protection Program
 |
| * A Bloodborne Pathogens Program
 |
| * [A Lockout/Tagout Program](https://www.emcins.com/ICEFiles/docs/lossControl/Lock-tag-out.docx)
 |

For help developing these programs, email losscontrol@emcins.com. |

***Revision History***

Revision 1 – <Month> <Year>

***Purpose and Scope***

<Company Name> is committed to providing a safe and healthy work environment and to protecting our employees from injury or death caused by uncontrolled hazards in the workplace. The purpose of <Company Name’s> HAZWOPER program is to establish work policies, practices and procedures that employees are to follow during an emergency response to a hazardous substance release/spill and during post-emergency operations. In this program, hazardous substance is defined as a substance in solid, liquid or gaseous form that can harm humans, other living organisms or the environment.

It will cover all areas where employees may be exposed to substances that can result in adverse health and safety effects (e.g., ammonia, Freon, gasoline, diesel fuel, battery acid and water treatment chemicals). This program is integrated into our company’s written safety and health program and is a collaborative effort that includes all employees.

***Program Responsibilities***

**Program Administrator.** The Program Administrator is responsible for directing all hazardous waste site operations, the HAZWOPER program implementation, management and recordkeeping requirements.

**Incident Commander.** The Incident Commander is responsible for managing emergency activities at a hazardous release site and directs the activities through a chain of command to those responsible for carrying out a specific emergency response tasks. The Incident Commander will also:

|  |
| --- |
| * Identify hazardous substances at the site
 |
| * Enforce the incident command system procedures
 |
| * Ensure those responding wear appropriate PPE
 |
| * Keep others away from the site
 |
| * Commence appropriate decontamination procedures after the emergency
 |

<Insert other personnel roles according to your Emergency Response Plan here>

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| ***Check Your Understanding.*** A HAZWOPER program is an expansion of your organization’s existing written Emergency Response Plan, with five additional sections that need to be included. You do not have to prepare or adjust an Emergency Response Plan if your current plan includes the following elements:

|  |
| --- |
| * Pre-emergency planning and coordination with outside parties
 |
| * Personnel roles, lines of authority, training and communication
 |
| * Possible emergencies and how to prevent them
 |
| * Safe distances and places of refuge
 |
| * Site security and control
 |
| * Evacuation routes and procedures
 |
| * Decontamination procedures
 |
| * Emergency medical treatment and first aid
 |
| * Emergency communication procedures
 |
| * Necessary emergency equipment, including personal protective equipment (PPE)
 |
| * Plan-evaluation criteria
 |

If your organization’s Emergency Response Plan is to evacuate all employees in the case of an emergency and you do not permit any employees to assist in the handling of the emergency, you do not need to develop an Emergency Response Plan. However, you must develop an Emergency Response Plan for the safe evacuation of all personnel and train them on what their responsibilities are in the event of an emergency.The additional elements needed to add to your Emergency Response Plan for a HAZWOPER program are:

|  |
| --- |
| * Incident command system
 |
| * Training
 |
| * Medical surveillance
 |
| * Chemical-protective clothing
 |
| * Post-emergency response operations
 |

 |

***Pre-emergency Planning and Incident Command System***

Pre-emergency planning and coordination with outside parties is the heart of <Company Name’s> HAZWOPER Program. All hazardous materials are identified within <Company Name’s> Hazard Communications Program and this information is shared with the <Fire Department and Emergency Management Coordinator> annually. This coordination allows the local emergency responders to have knowledge of what hazardous materials are present in our facilities and how our employees are going to react to a release or spill.

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| ***Check Your Understanding.*** An incident command system is a set of procedures for controlling and managing operations during an emergency. One person, the Incident Commander, has the responsibility of managing emergency activities at the site. The first step in developing an incident command system for your organization is developing a list of hazardous substance or conditions that exist at your site. OSHA provides an eTool to help you develop an incident command system, which can be found here: <https://www.osha.gov/SLTC/etools/ics/prepare_implement.html> |

<Company Name> Incident Command System is a standardized incident management system based on federal and state models. It is designed specifically to allow <Company Name’s> responders to understand the organizational structure local emergency responders will be using on-site.

<Company Name’s Incident Command System divides its emergency response into five manageable functions: command, operations, planning, logistics, and finance and administration. Figure 1 below shows our incident command system structure>.



Figure 1 - Incident Command System Structure

***Employee Training***

Those who will or may respond to an emergency will be appropriately trained before participating in an actual incident. New employees will be trained upon hiring, and re-trained any time the employee’s responsibilities under the plan change or whenever the plan itself changes. <Company Name> will provide copies of all emergency response plans to employees and copies will be posted at <location>.

**First Responder Awareness Level Training.**

All <Company Name> employees are required to receive on-site First Responder Awareness Level training. Employees will receive training prior to initial assignment and refresher training annually. All training records will be maintained on the training record located in ***Appendix A.***

Employees will be trained on:

|  |
| --- |
| * <Company Name’s> Incident Command System
 |
| * <Company Name’s> Emergency Response Plan
 |
| * <Company Name’s> Hazard Communication Program
 |
| * Areas where hazardous substances may be present
 |
| * Methods and observations that can be used to detect the presence or release of a hazardous substances in the work area
 |
| * Protective measures, including training in proper selection and use of PPE
 |
| * An explanation of the chemical labeling system
 |
| * Notification of appropriate personnel
 |
| * The elements of the Confined Space Program (if applicable)
 |
| * <Company Name’s> medical surveillance program
 |

**First Responder Operations Level Training**. All supervisors andanyone at <Company Name> who responds to the release of a hazardous substance, or contains the release but is not involved in stopping the release is required to receive on-site First Responder Operations Level training. The training includes all the topics covered in the First Responder Awareness Level training and the proper procedures for these selected employees to take if they witness, discover or otherwise become aware of a release of hazardous substances. Initial training and competencies will take approximately eight hours and employees will receive refresher training annually.

**Incident Commander.** Any emergency responder expected to perform as an Incident Commander should be trained to fulfill the obligations of the position. Incident Commander training will include all the topics covered in First Responder Awareness, First Responder Operations level training and training on:

|  |
| --- |
| * Analyzing a hazardous substance to determine the magnitude of the release
 |
| * Planning and implementing an appropriate response
 |
| * Evaluating the progress of the emergency response
 |

Initial training and competencies will take approximately 24 hours. Incident Commanders will receive refresher training annually.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| ***Check Your Understanding.*** There are many additional levels of emergency responders that some industries should or must have as listed in the table below. If you need assistance in developing more detailed response training plans or procedures contact a qualified professional or email EMC at losscontrol@emcins.com

|  |  |  |
| --- | --- | --- |
| **Responder Category** | **Tasks** | **Training** |
| Skilled Support Personnel | Equipment operators needed to perform emergency support work | Trained on hazards, PPE and duties at the scene |
| Specialist Employees | Provides technical assistance or advice on hazardous substances | Must be able to demonstrate competency in hazardous substances, annual refresher training |
| HAZMAT Technician | Responds to releases of hazardous substances and attempts to stop release  | 24 hours of operation level training. Additional training [See 1910.120(q)(6)(iii)], annual refresher training  |
| HAZMAT Specialist | Supports the HAZMAT technician and acts as a government liaison during an emergency situation  | 24 hours of HAZMAT Technician training. Additional training [See 1910.120(q)(6)(iv)], annual refresher training |

 |

***Lines of Communication***

<Adjust these procedures to meet the needs of your organization>

In the event an employee (First Responder Awareness Level) witnesses or discovers a release of a hazardous substance, he/she will:

|  |
| --- |
| 1. Notify <Company Name’s> Incident Commander of the release and/or call 911 if necessary.
 |
| 1. Follow instructions from the Incident Commander and/or supervisors.
 |

In the event a supervisor (First Responder Operations Level) discovers or otherwise becomes aware of a release of a hazardous substance, he/she will:

|  |
| --- |
| 1. Notify <Company Name’s> Incident Commander of the release and/or call 911 if necessary.
 |
| 1. Communicate spill to employees and facilitate evacuation/relocation procedures.
 |
| 1. Assist the Incident Commander as necessary.
 |
| 1. Wait for emergency response.
 |

In the event of an emergency situation, the Incident Commander will:

|  |
| --- |
| 1. If necessary, call 911 and notify the proper authorities of the release of the material.
 |
| 1. Notify all supervisors of release and instruct them to evacuate/relocate.
 |
| 1. Evacuate the immediate area and keep others from entering the area.
 |
| 1. Identify materials from shipping or container labels (if possible without entering the area).
 |
| 1. Identify proper PPE from the safety data sheets or labels.
 |
| 1. Determine if spill response measures can be done safely with available PPE.
 |
| 1. If the release can be safely contained, obtain proper material such as absorbent materials from the spill response kits found at <locations>.
 |
| 1. Obtain and put on needed PPE.
 |
| 1. Apply absorbent material or other containment measures on and around the spill or release.
 |
| 1. Keep other employees out of the release area.
 |
| 1. Wait for emergency response.
 |

***Emergency Recognition and Prevention***

Below is a list of chemicals used in <Company Name’s> location(s). The location where the chemical is used, protections (such as engineering controls) in place to prevent a release or spill, the permissible exposure limit and the incidental spill amount are listed. ***If an amount above the incidental spill amount is spilled or released, employees will follow the HAZWOPER Program procedures.***

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Chemical Name** | **Location(s) Used** | **Protections in Place** | **Permissible Exposure Limit** | **Incidental Spill Amount** |
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***Evacuation Procedures, Safe Distances and Places of Refuge***

During an emergency evacuation, employees will evacuate using these specified routes <list routes for each floor or area> to <Location(s)>. Once at <Location(s)>, supervisors will take role and note any missing employees and report this information to the Incident Commander or emergency responders.

<Include a map of building(s) containing the location of all buildings, structures, equipment, location of first aid, routes of entry and exit, emergency exit routes, staging areas and safe places of refuge>

***Emergency Alerting and Response Procedures***

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| ***Check Your Understanding.*** This section should address how employees will be informed that an emergency exists, and how they should respond. There are two important questions that need to be addressed:1. Who needs to be made aware of the emergency?2. What do they need to be told to do? The following information is critical to inform employees of what their immediate response should be.

|  |  |
| --- | --- |
| **Notification** | Making the existence of the emergency situation known |
| **Level and Type of Response** | The required response based on the emergency |
| **Nature of Emergency** | The type of emergency condition (Fire, explosion, chemical spill, vapor release) |
| **Location** | Critically important in larger facilities |
| **Ambient Conditions** | Environmental factors that influence evacuation or the response procedure |

 |

<Company Name> has an alarm system in place to inform all affected employees of a release or potential release of a hazardous substance. The alarm system can be tripped by <manner of tripping alarm> and will consist of <A siren sound, a verbal notification, etc.> If the alarm is sound, affected employees should respond accordingly.

<Alarm Type: Response>

<Alarm Type: Response>

<Alarm Type: Response>

***Site Safety and Control***

If the spill/release requires a full evacuation of the building, First Responders Operations Level employees will ensure no unauthorized person enters the building and wait for emergency response to arrive and secure the site.

If the spill/release does not require a full evacuation, the Incident Commander will block off the spill or release area and make sure all other employees are a safe distance away.

***Emergency Medical Treatment and First Aid***

In the event the spill/release causes injury to an employee requiring emergency medical treatment or first aid, the injured employee(s) will be sent to:

<Hospital Name>

<Address>

<Phone Number>

<Hospital Name> has been made aware of our HAZWOPER Program and will handle decontamination efforts if necessary.

***Medical Surveillance***

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| ***Check Your Understanding.*** A medical surveillance program helps assess and monitor the health and fitness of employees working with or responding to releases of hazardous substances. The purpose of the examinations is to detect medical conditions that could harm employees because of their potential exposure to hazardous substances.  |

<Company Name> has a medical surveillance program for all employees whose role may expose them to hazardous substances at or above the permissible exposure limits (PEL) or, if there is no PEL, above the published exposure levels for more than 30 days per year.

All employees whose job includes First Responder Operations Level duties or Incident Commander duties will be medically examined before assignment, immediately after reporting symptoms of possible overexposure and at termination or reassignment from the First Responder Operations Level or Incident Commander duties. Additionally, all employees who are or may be exposed to a hazardous substance or who are required to wear a respirator for 30 days or more a year are covered under <Company Name’s> medical surveillance program. All employees required to be in the medical surveillance program are listed in ***Appendix B***.

All medical surveillance examinations are performed by licensed physicians, without cost to the employee and at a reasonable time and place. Examinations will include a medical and work history. Special emphasis will be placed on symptoms of exposure to hazardous substances and health hazards on the job and to fitness for duty, including the ability to wear PPE during their First Responder Operations Level or Incident Commander role.

<Company Name> has provided the examining physician a copy of the HAZWOPER Program and its appendices, a description of the employee’s duties, anticipated exposure levels, a description of any PPE to be used, and any information from previous medical examinations.

<Company Name> will obtain a written opinion from the physician that contains the results of the medical examination, any detected medical conditions that could place the employee at an increased risk of exposure, and any recommended limitations. The employee will receive a copy of the physician’s written findings. The written opinion obtained by the employer shall not reveal specific findings or diagnoses unrelated to the possible occupational exposure. These medical opinions and other related information will be kept in the employee’s <HR personnel> file.

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| ***Check Your Understanding.*** Be aware that there are medical surveillance requirements in other OSHA substance-specific standards that may be applicable for sites where hazardous substances are present (e.g., lead, asbestos and benzene). These substance specific standards are included under 28 CFR Part 1910 Subpart Z – Toxic and Hazardous Substances. |

All exposure records, medical examination records, and written opinions will be maintained for the duration of employment plus 30 years. Each First Responder Operations Level employee and Incident Commander will be notified in writing that their medical surveillance records are maintained in the <Human Recourses department in their personnel file> and <are available during regular business hours.>

***Chemical-Protective Equipment***

The following PPE will be available in the spill response kits located at <location> and will also be provided to each First Responder Operations Level employee and Incident Commander. Employees will be trained on how to safely inspect, use and wear the PPE listed below. Employees should only perform their spill response duties if the provided PPE will allow safe interaction with the released chemicals as per the safety data sheets. The PPE distributed will be determined in the Personal Protective Equipment Program assessment and based on the exposures determined during that assessment. PPE will be updated based on this assessment at least annually.

|  |  |  |  |
| --- | --- | --- | --- |
| **Type/Name of PPE** | **Location** | **When/How PPE Should Be Used** | **Limitations of PPE** |
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| ***Check Your Understanding.*** This part of the HAZWOPER program is designed to protect employees from chemical, physical or biological hazards during their emergency response duties. For additional assistance in preparing a PPE program see EMC’s safety program template: [Personal Protective Equipment Program](http://www.emcins.com/guest/default.asp?Category=RWEBU&Service=SPT-SafetyTemplates&topic=8): When discussing PPE at hazardous materials storage sites it is often identified by the level of protection and frequently referred to as level A, B, C or D.Level A provides the greatest level of skin, respiratory and eye protection. (e.g., totally-encapsulating, chemical protective suit with self-contained breathing apparatus (SCBA))Level B provides the greatest level of respiratory protection, but a lesser level of skin protection than Level A (e.g., chemical resistant clothing with SCBA)Level C provides skin protection, but a lesser level of respiratory protection than Level B (e.g., chemical resistant clothing with air-purifying respirator)Level D provides only minimal protection for nuisance contamination only (e.g., general coveralls, hard hat, safety glasses and boots) |

***Post-Emergency Response Operations (Decontamination)***

<Company Name> maintenance employees will perform spill clean-up operations if the amount of material released is at an incidental level. If the release is of an amount beyond incidental, <Company Name> will contact XYZ Company for clean-up services.

 XYZ Company

 1234 Highway 69

 Any Town, USA 12345

 (555) 555-5555

 xyzcleanup@gmail.com

<XYZ Company> is responsible for both clean-up and decontamination of all areas affected and all PPE used during the incident.

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| ***Check Your Understanding.*** After the emergency response to a release of a hazardous substance organizations often transition from emergency response to hazardous substance cleanup operations. These post-emergency cleanup operations can be performed by two groups of people: employees on-site where the emergency release occurred or contractors.On-site employees are generally more familiar with the types of hazardous substances present, site conditions and methods appropriate to protect themselves from the related hazards. As a result these employees do not have to be trained in accordance with 1910.120(e) because it is expected that they have already received appropriate training. Training on your Emergency Response Plan, Respiratory Protection Program, Hazard Communication Program and other appropriate safety and health training that may be necessary to perform clean-up tasks. Often emergency responders who are properly trained continue to work through the clean-up operations. If your employees are properly trained on these programs, they do not require additional or repeat training to perform the cleanup operations.If off-site employees are involved in cleanup operations they must be trained in accordance with HAZWOPER requirements for cleanup operations (1910.120(b)-(o)) which is beyond the scope of this document. |

***Periodic Program Review***

The HAZWOPER Program and procedures will be reviewed annually. The review will be documented on the form located in ***Appendix C.***

***Appendix A—HAZWOPER Training Record***

The following individuals received training on <Company Names’> HAZWOPER Program

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| --- | --- |
| **Print Name** | **Sign Name** |
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The undersigned conducted training in accordance with <Company Name’s > HAZWOPER Program.

|  |  |
| --- | --- |
| Print Instructor’s Name |  |
| Instructor’s Signature |  |
| Instructor’s Title |  |
| Date of Training |  |

***Appendix B – Medical Surveillance***

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| **HAZWOPER Medical Surveillance Program** |
| **Name** | **Social Security Number** | **Medical Complaints Due to Possible Exposure** | **Medical Records Location** |
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***Appendix C – Annual Evaluation Report***

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| --- | --- |
| Date of Evaluation: | Evaluated By (list all present): |
| Written Program Reviewed: Yes No |
| Comments on Written Program: |
| The following specific procedures have been reviewed: |
| The following specific procedures were modified: |
| The following specific procedures were added: |
| A review of the accident reports and injury and illness reports were made: Yes No |
| The following additional expense(s) resulted from failure to use correct HAZWOPER procedures: |
| Comments: |