

12.0 WORKER TRAINING AND QUALIFICATION

12.1 Site Orientation

All PMC employees and each PMC Subcontractor employee shall attend site orientation training prior to beginning field work assignments at RMA.

12.2 General Health and Safety Training

The PMC and each PMC Subcontractor shall provide their employees with the health and safety training required to comply with subcontract requirements, achieve compliance with regulatory standards, and other training and qualification necessary for an employee to complete the assigned job duties safely. This training may include competent person training and/or training required by 29 CFR 1926.21, General Safety Training and Education. Employee participation in development and/or presentation of training curricula should be encouraged by site management and safety personnel.

Documentation of all required training (e.g., training certificates or attendance rosters) shall be maintained at RMA by the employer and made available for inspection by the PMC or RVO. Training documentation shall be maintained in an organized manner that is readily retrievable and shows that individual workers have the required training. Figure 12-1 is an example of a form that may be used to simplify personnel training tracking.

12.3 Hazardous Waste Operations and Emergency Response Training

All PMC and RVO Subcontractor employees engaging in hazardous waste operations or emergency response shall receive appropriate training as required by 29 CFR 1910.120 and 29 CFR 1926.65 (or if required by Subcontract). At a minimum, the training shall have consisted of instruction in the topics outlined in 29 CFR 1910.120 and 29 CFR 1926.65. Personnel who have not met these training requirements shall not be allowed to engage in hazardous waste operations or emergency response activities.

12.3.1 Initial Training

General site workers engaged in hazardous waste operations shall, at the time of job assignments, have received a minimum of 40 hours of initial health and safety training for hazardous waste site operations, unless otherwise noted in the above-referenced standards.

Employees who may be exposed to health hazards or hazardous substances at treatment, storage, and disposal (TSD) operations shall receive a minimum of 24 hours of initial training to enable them to perform their assigned duties and functions in a safe and healthful manner.

Employees engaged in emergency response operations shall be trained to the level of required competence in accordance with 29 CFR 1910.120, paragraphs (p) and/or (q).

12.3.2 Three-Day Supervised Field Experience

General site workers for hazardous waste operations shall have received three days of supervised field experience (on-the-job training) under the direct supervision of a trained [meets Management and Supervisory Training requirements of 29 CFR 1926.65(e)(4)], qualified (be assigned by the employer or organization to supervise workers) supervisor, and the employer shall provide documentation that this training has been completed. If the field experience has not already been received and documented at a similar site, this supervised experience shall be accomplished and documented at the beginning of the assignment at RMA. An example record of Three-day Supervised Field Experience is provided as Figure 12-2.

12.3.3 Refresher Training

General site workers and TSD workers shall receive 8 hours of refresher training annually (within the previous 12-month period) to maintain qualifications for field work. Employees engaged in emergency response operations shall receive annual refresher training of sufficient content and duration to maintain their competencies or shall demonstrate competency in those areas at least annually.

12.3.4 Eight-Hour Supervisory Training

The PMC or PMC Subcontractor on-site management, or supervisors who will be directly responsible for or supervise employees engaged in hazardous waste site operations, will have received the training specified in Section 12.3.1 and 12.3.2, and at least 8 hours of additional specialized training on managing such operations prior to beginning field work at RMA. Training shall meet requirements of 29 CFR 1926.65(e)(4).

12.3.5 Site-Specific Training

Prior to commencement of field activities, all field personnel assigned to the project will have completed site-specific training that will address the contents of applicable HASPs, including the activities, procedures, monitoring, and equipment used in the site operations. Site-specific training will also include site and facility layout, potential hazards, risks associated with identified hazardous substances at the site, hazard communication as necessary, PPE, incident reporting, emergency response actions, and available emergency services. This training allows field workers to clarify anything they do not understand and to reinforce their responsibilities regarding safety and work operations for their particular activity.

12.4 First Aid and Cardiopulmonary Resuscitation

Fire and Emergency Services is the designated first aid and emergency medical services provider at RMA. First aid and cardiopulmonary resuscitation (CPR)-trained PMC and subcontractor employees may voluntarily provide first aid or CPR as a "Good Samaritan act" until FES arrives at the scene. When employees voluntarily provide first aid or CPR involving blood or other potentially infectious materials, the Hepatitis B vaccination series shall be made available to them as soon as possible but no later than 24 hours following the potential exposure. Other applicable elements of 29 CFR 1910.1030, Bloodborne Pathogens, shall also be implemented by the employer.

First Aid and CPR training consistent with the requirements of a nationally recognized organization such as the American Red Cross Association or National Safety Council shall be administered by a certified trainer to an adequate number of people to provide volunteer support capability during an emergency situation. It is expected that a minimum of two personnel per active field operation will have first aid and CPR training. The PMC and each PMC Subcontractor are responsible for identifying on-site personnel selected for first aid and CPR training to support their work, and providing such training. Employee information and training for bloodborne pathogens shall be provided as required in 29 CFR 1910.1030 for personnel trained to administer first aid and/or CPR.

If the PMC or PMC Subcontractor requires or designates personnel to provide first aid or CPR on the job, all requirements of 29 CFR 1910.1030, Bloodborne Pathogens, including, but not limited to, employee information and training, prophylactic Hepatitis B series vaccination (or Hepatitis B Vaccine Declination) shall be implemented.

12.5 Substance Abuse

All PMC and PMC Subcontractor employers shall maintain and implement a Drug Free Workplace program for site work activities performed at RMA as required by Subcontract. Use of working under the influence of alcohol or controlled substances (other than prescribed or over-the-counter medication) is strictly prohibited.

Prework substance abuse testing performed by the current employer is required for PMC and PMC Subcontractor employees. Either preemployment substance abuse testing or substance abuse testing conducted specifically for work at RMA will meet the requirement for prework substance abuse testing.

Site workers are subject to substance abuse testing at any time "for cause" or following a safety or property damage incident. The PMC Subcontractors are responsible for ensuring that prework, for cause and postincident drug and alcohol testing are performed. Positive substance abuse results from "for cause" or postincident substance abuse testing shall be reported to the PMC Health and Safety Manager immediately.

12.6 Other Required Training and Qualifications

Other training and qualification may be required depending on the task work scope and assigned duties of an individual employee. This may include training for waste handling, hazardous materials transportation, respiratory protection, hazard communication, noise exposure or hearing conservation, and various qualified person requirements (e.g., operation of heavy equipment, forklifts, confined space entry, excavations). Specific additional training and/or qualified person requirements will be identified through the activity hazard AHA or task-specific health and safety planning process. The employer is responsible for ensuring that identified training and/or qualified person requirements are met for site workers.

Figure 12-1 Example Personnel Training Tracking Form

	Program Management Contractor Rocky Mountain Arsenal	PERSONNEL TRAINING TRACKING FORM
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Project: _____ Company: _____

Name: _____ Title/Job Function: _____

Training/Certification	Date Completed	Due Date*
OSHA 40-hr (or 24-hr, if applicable)		
3-Day Supervised Field Experience		
8-hr OSHA Refresher		
8-hr OSHA Supervisor		
Annual Physical/Medical Approval for Hazardous Waste Work		
Medical Approval for Respirator Use		
Medical Data Sheet		
Respirator Fit Test		
Cholinesterase Test		
First Aid/CPR Certified		
PMC HASP Review		
Training on Site/Task-Specific HASP		
RVO Project Rules Handbook Signature Page		
Hearing Conservation training		
Audiogram		
Hazard Communication training		
Bloodborne Pathogens training		
Confined Space Entry training		
Fall Protection training		
Excavation / Competent Person training		
Commercial Driver's License		
Heavy Equipment / Lift Operator		
Asbestos Awareness		
Asbestos Worker		
Asbestos Supervisor		
Asbestos Inspector		
Pre-employment Drug Screen		
RMA Site Orientation (for Subcontractor or PMC)		
CRA Access training		

* Indicate "NA" if not applicable or if training is one-time only training.
NOTE: This form is NOT a substitute of proper training documentation. Personnel training and medical documentation must be maintained on-site in addition to this form.

Figure 12-2 Record of Three-day Supervised Field Experience

	Program Management Contractor Rocky Mountain Arsenal	<h2 style="margin:0;">RECORD OF 3-DAY SUPERVISED FIELD EXPERIENCE</h2>										
Last name _____ First _____		Employee No. _____										
Company _____												
Address _____												
Immediate Supervisor _____		Position _____										
Day 1 (Date) _____												
Supervised by _____ Title _____												
Company _____												
Supervised duties _____												

<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:70%;">Protection levels</th> <th style="width:5%;">D</th> <th style="width:5%;">C</th> <th style="width:5%;">B</th> <th style="width:15%;">Total hours</th> </tr> </thead> <tbody> <tr> <td>Supervised hours in each</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>			Protection levels	D	C	B	Total hours	Supervised hours in each				
Protection levels	D	C	B	Total hours								
Supervised hours in each												
Comments _____												

Supervisor _____		Trainee _____										
Signature _____		Signature _____										
Day 2 (Date) _____												
Supervised by _____ Title _____												
Company _____												
Supervised duties _____												

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Protection levels	D	C	B	Total hours								
Supervised hours in each												
Comments _____												

Supervisor _____		Trainee _____										
Signature _____		Signature _____										
Day 3 (Date) _____												
Supervised by _____ Title _____												
Company _____												
Supervised duties _____												

<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:70%;">Protection levels</th> <th style="width:5%;">D</th> <th style="width:5%;">C</th> <th style="width:5%;">B</th> <th style="width:15%;">Total hours</th> </tr> </thead> <tbody> <tr> <td>Supervised hours in each</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>			Protection levels	D	C	B	Total hours	Supervised hours in each				
Protection levels	D	C	B	Total hours								
Supervised hours in each												
Comments _____												

Supervisor _____		Trainee _____										
Signature _____		Signature _____										

Date **supervisor** completed HAZWOPER 8-Hr Supervisor training (29 CFR 1926.65 (e) (4)) _____