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## **APPENDIX C**

# **REVISED FACT SHEET: SAFETY AND HEALTH REQUIREMENTS FOR EPA INSPECTORS**



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May 14, 2001

**MEMORANDUM**

**SUBJECT:** *Revised Fact Sheet*. Safety and Health Requirements for EPA Compliance Inspectors

**FROM:** Michael Alushin, Director /S/  
Compliance Assessment and Media Programs Division

**TO:** Regional Enforcement Division Directors, Regions 1, 2,4, 6, 8  
Regional Media Division Directors, Regions 3, 5, 7, 9, 10  
Regional Science and Technology Division Directors, Regions 1-10

This memorandum transmits a **revised fact sheet** to distribute to the regional inspectors in your respective organizations. We prepared the fact sheet in response to requests for a quick reference summary made at the National Inspector Workshop we held last November. If you wish more information, you should obtain copies of EPA Orders 1440.1, 1440.2, 3500.1, and the OSHA requirements in 29 CFR 1910.120. The fact sheet discusses how to obtain copies of these documents.

This revised fact sheet was developed to address concerns expressed by Regional safety and health officers dealing with refresher health and safety training. The following highlights considerations leading to the revisions we made to the fact sheet:

- Language in the various safety and health orders can be interpreted in several ways
- After reviewing Regional concerns, we have decided to revise the fact sheet to interpret the Orders as requiring **only a minimum of eight hours annual refresher training**
- EPA inspectors that have been trained to the intermediate or advanced level need different refresher training than inspectors trained to the basic level

We encourage the Regions, based on the number of intermediate and advanced level inspectors in their Region, to provide training on the specific risks posed to these inspectors. The Regions should be providing safety and health refresher courses specific to the level the inspector has achieved (basic, intermediate or advanced). The basic level refresher course can generally be met by reviewing the "Safety, Health and Environmental Management Training for Field Activities", in conjunction with the field refresher requirement. We encourage you to review the various EPA Orders dealing with safety and health of EPA employees that are posted on the EPA Inspector Website. The website address is: <http://INTRANET.EPA.GOV/OECA/OC/METD/INSPECTOR>

Thank you for your attention. We sincerely hope the revised fact sheet will improve the understanding of the health and safety requirements in order to provide EPA inspectors with a safe and healthy working environment. If you have any questions about this fact sheet, you can contact either OECA (Ken Gigliello at 202-564-2300) or OARM (Jerry Oakley at 202-564-2082).

cc: OC Division Directors  
ORE Division Directors  
OCEFT Division Directors  
OARM/Safety, Health and Management Division  
Enforcement Coordinators, Regions I-X  
Safety and Health Officers, Regions I-X

**REVISED FACT SHEET**  
**Safety and Health Requirements for EPA Compliance Inspectors**

(May 11, 2001)

**Introduction** This fact sheet is intended to be a quick reference guide for EPA compliance inspectors. It provides a **summary** of the requirements of EPA Orders 1440.1 and 1440.2, and OSHA 29 CFR 1910.120 (e)(3)-(9). EPA compliance inspectors should obtain copies of the specific Orders and the OSHA regulations for more specific information. EPA Orders dealing with safety and health are posted on the EPA Inspector Website. The website address is: **<http://INTRANET.EPA.GOV/OECA/OC/METD/INSPECTOR>**

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**Background** EPA Order 1440.1, dated May, 1998, Safety, Health and Environmental Management Program, establishes new policies, delegates authorities, defines management functions and responsibilities, and creates Agency-wide organizational structure for the administration of Safety, Health and Environmental Management (SHEEP). Copies of the Order can be obtained from the Office of Administration and Resource Management (ARM), Safety, Health and Environmental Management Division (Phone: 202-564-1640), or the Regional Safety and Health Officer.

EPA Order 1440.1 is an omnibus Order designed to replace all specific EPA Orders dealing with safety, health and environmental management. This action was taken to minimize the number of orders and to enable more flexibility in modifying regulations through the use of guidelines.

When EPA Order 1440.1 was finalized, the ARM was beginning a review of the entire issue of training requirements for both field and laboratory employees. Until this review was completed, ARM did not want to make changes to the Orders related to training.

As a result, EPA Order 1440.2, Health and Safety Requirements for Employees Engaged in Field Activities, was not incorporated into EPA Order 1440.1. However, ARM expects to do so in the Spring of 2001. ARM is examining several alternatives and when the review is completed, they will produce a set of guidelines to be included under EPA Order 1440.1. This will eliminate EPA Order 1440.2. **Until that time, EPA Order 1440.2 remains in effect.**

The guidelines that have been, and will be developed to replace existing Orders will be issued to EPA personnel to explain statutory and regulatory

mandates, to interpret their application to EPA activities, and to identify the knowledge, skills, and abilities of personnel who must implement them. *The guidelines are recommendations, and do not have to be followed exactly.*

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**Guidelines** Approximately 55 safety, health and environmental management guidelines have been developed to date to help EPA manage its safety, health and environmental management responsibilities. The guidelines developed to date covering a wide range of topics including management systems, environmental statutes, transferring real property, office building compliance, fire protection and life safety, chemical handling and safety, laboratory procedures, forklift operations, electrical safety, radiation, lockout/tagout, occupational noise, workplace hazards, hazard communication, handling of PCBs and asbestos, and personal protective equipment.

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**EPA Order  
1440.2**

EPA Order 1440.2, dated July 12, 1981, and titled Health and Safety Requirements for Employees Engaged in Field Activities, establishes policy, responsibilities, and **mandatory requirements** for occupational health and safety training and certification, and occupational medical monitoring of Agency employees engaged in field activities. The Order is seven (7) pages in length. The Order establishes three (3) levels of initial health and safety training: basic (24 hours), intermediate (8 hours), and advanced (8 hours). The specific requirements for each level are listed below. This Order is incorporated by reference into EPA Order 3500.1, Training and Development for Lead Compliance Inspectors/Field Investigators, dated June 29, 1988. This Order is currently being revised but the EPA Order 1440.1 reference will be included in the revised Order.

The Order only reflects EPA's internal training requirements and does NOT eliminate the requirements for field personnel working with hazardous materials covered by 29CFR 1910.120 (e)(3)-(9). These OSHA regulations require training for employees working at clean-up operations conducted under the Superfund or RCRA correction action programs, voluntary cleanup operations, operations involving hazardous waste at RCRA Treatment, Storage and Disposal Facilities (TSDF's), and emergency response operations for releases of hazardous substances. The requirements can be retrieved from the OSHA web site at [http://www.osha-slc.gov/OshStd\\_data/1910\\_0120.html](http://www.osha-slc.gov/OshStd_data/1910_0120.html). While many of these requirements are similar and some training will count toward meeting both sets of requirements, it should be remembered that they are separate requirements.

**Basic** The basic level training shall include, but not be limited to, classroom instruction in all of the following areas:

- Employee rights and responsibilities
- Nature of anticipated hazards
- Emergency self-help and rescue
- Vehicles – mandatory rules and regulations
- Safe use of field equipment
- Use, handling, storage, and transportation of hazardous material
- Personal protective equipment and clothing, use, and care, and
- Safe sampling techniques

In addition to classroom instruction, the employee shall accompany an employee experienced in field activities and perform actual field activities for a minimum of three (3) days within a period of three months after classroom instruction.

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**Intermediate** The intermediate level training is required for employees who engage in activities at uncontrolled hazardous waste and hazardous spill site investigations or employees engaged in other activities which are determined at a later date to present unique hazards requiring additional training. The intermediate training shall include, but not be limited to, to the following subject areas:

- Site surveillance, observation, and safety plan development
- Use and decontamination of totally enclosed protective clothing/equipment
- Use of field test equipment for radioactivity, exclusivity, and other measurements
- Topics specific to other identified activities

In addition to classroom instruction, the employee shall accompany an employee experienced in hazardous waste and spill site investigations and/or cleanup operations and perform actual field activities for a minimum of three (3) days within a period of three months after classroom instruction.

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**Advanced** The advanced level training is required for employees who manage uncontrolled hazardous waste and spill site monitoring, sampling, investigations and cleanup operations. The advanced training shall include, but not be limited to, to the following subject areas:

- Management of restricted and safe zones
- Rules of handling the press and VIP's
- Safe use of specialized sampling equipment

In addition to classroom instruction, the employee shall accompany an employee experienced in managing hazardous waste and spill site investigations or cleanup operations and perform actual field activities for a minimum of three (3) days within a period of three months after classroom instruction.

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Refresher

***Refresher training requirements are a minimum of eight (8) hours for all EPA inspectors. The type of training required depends upon which level of training the EPA inspector has completed. Basic level refresher training is probably appropriate for most EPA inspectors.***

***For EPA inspectors that have taken intermediate and advanced level safety and health training, refresher training should be tailored to the specific needs of the particular EPA inspectors, where possible. The Regions and/or ARM are responsible for developing and delivering this level-specific refresher training.***

***In addition to the classroom instruction, employees shall have demonstrated sufficient practical experience to perform their duties in a safe and healthful manner by having performed actual field tasks related to their level of training.***



### Safety and Health Training Availability

Training	How to Get? Where Delivered?	Comments
<b>EPA Safety and Health Environmental Management Training for Field Activities -- computer based CD-rom course</b>	Jerry Oakey (ARM) 202-564-2082	<p>Includes modules on employee rights and responsibilities, nature of anticipated hazards (in-depth), personal protective equipment, some safe use of field and sampling equipment, and transportation of hazardous materials. CD does <b>not</b> cover emergency self-help and rescue, mandatory rules and regulations for vehicles, and specific field and sampling equipment procedures.</p> <p>This CD was not available when EPA Order 1440.2 was written in 1981. ARM has approved CD-rom training as an acceptable alternative to traditional classroom training with a couple of caveats: 1) Some activities (e.g., respirator fit testing) require hands-on training, and are not covered by CD-rom training, 2) The one requirement that all technology-based training to be acceptable to EPA and OSHA is for the user have access, either on-site or by other means of communication, to a source of information to answer any specific questions that may occur during the technology-based training. Generally this is the supervisor, the local health and safety program manager, or an experienced employee.</p> <p>Under the existing CD-rom course (SHE'D Disk #2), ARM allows one hour of training credit per training module. The CD-rom includes 34 modules. Students are required to take a total of 24 modules to meet the health and safety requirements. Eighteen (18) specific modules are required to be taken. The student must then choose six (6) additional modules from the remaining 16 modules that address the type of work they routinely conduct.</p> <p>The SHE'D disk #2 only covers the basic EPA 24-hour course. Some of the modules can be used as part of the annual 8-hour refresher program.</p>

<b>Health and Safety Training Live Course</b>	Limited availability in Edison, NJ, Cincinnati, OH and selected Regions.	This course is a full 40-hour course that covers employee rights and responsibilities, nature of anticipated hazards (in-depth), personal protective equipment, some safe use of field and sampling equipment, and transportation of hazardous materials. This course also covers emergency self-help and rescue, mandatory rules and regulations for vehicles, and specific field and sampling equipment procedures.
<b>First aid and CPR courses</b>	American Red Cross and other commercial vendors	These two courses can be combined in a one day event or taken separately. First aid courses offered by the Red Cross only need to be taken every 3 years. CPR courses are required every year.
<b>Vehicle rules and regulations</b>	Regional Health and Safety Training Officer. GSA or commercial vendors offer a defensive driving course.	<p>Since EPA inspectors spend a considerable amount of time driving to conduct inspections, it is required that they know what to do in case of an accident or other mishap.</p> <p>In addition, since driving is a hazard of the job, inspectors should, on some routine basis, take a defensive driving course to hone and sharpen their skills.</p>
<b>Shipment of Hazardous Materials</b>	ARM distributed a DOT course on CD-rom to the Regions. Courses are commercially available.	<p>All inspectors who ship hazardous materials should take the DOT or commercially available course.</p> <p>Contact the Regional Safety and Health Program manager for details.</p> <p>OC recently transmitted a fact sheet for inspectors on DOT training requirements for shipping hazardous materials.</p>
<b>Other courses</b>	ARM	ARM can be contacted for additional CD-rom and web-based courses to supplement field personnel training on topics such as radiation protection, due diligence-real property transfers, and OECA compliance training manuals.