

**1. What training is required for U.S. Fish and Wildlife Service workers that are capturing and cleaning wildlife?**

U.S. Fish and Wildlife Service workers working at the Gulf oil spill should follow the guidance provided by their agency. The USFWS training information can be found at <http://nctc.fws.gov/csp/oilspill/main.html>.

**2. What is required for 40-hour HAZWOPER training?**

Paragraphs 29 CFR 1910.120(q)(11) and (e) contain requirements for the 40-hour HAZWOPER training for post-emergency response cleanup workers and supervisors. A more rigorous 40-hour HAZWOPER course is required for those who will supervise cleanup, or be engaged in efforts involving a greater exposure to oil. In order to meet the certifications of this training, a combination of classroom and hands-on activities, and/or applicable experience is required. Training elements include instruction on the makeup and risks associated with the hazardous material(s) involved, and experience with the equipment needed for the work, safety gear, and the local environment.

OSHA has received reports that some training providers are offering this training in significantly less than 40 hours, showing video presentations and offering only limited instruction. Other reports complain of excessive class size of 100 or more students. This training cannot be shortened to anything less than 40 hours. Moreover, computer-based training, which could be offered over the Internet, can be only used as part of an overall 40-hour HAZWOPER training course. But, such training alone does not meet the full training requirements.

Class size should be limited to allow each student to ask questions of the instructor, and to allow proper instructor observation of each student's hands-on training activities. Student-instructor ratios should not exceed 30 students per instructor. (Reference 1910.120 Appendix E, Training Curriculum Guidelines, Non-mandatory)

**3. What kind of medical exam do I need to work on the oil spill?**

OSHA requires a medical evaluation if your job duties require you to wear a respirator. The medical evaluation must follow the requirement in OSHA's Respiratory Protection Standard, 29 CFR 1910.134. There is no other medical evaluation or exam required at this time.

(See also, Q and A #15)

**4. I took a "free" 40-hour training class but the trainer (or company) will not give me a certificate. How do I get my certificate?**

The trainer (or company) is required to provide you with a certificate (or card) of training only when there is an employer-employee relationship. If you are not already working for a company that is offering the training, the trainer or company does not have to provide you with a training certificate (or card).

**5. I paid a trainer (or company) to take a 40-hour HAZWOPER training course but they did not give me my training certificate (or card). How do I get my training certificate?**

If you feel you received fraudulent training, then you may contact the closest area office to file a complaint or you may call 1-800-321-OSHA (6742).

**6. I took a 40-hour HAZWOPER training course but was told I would have to wait 60 days to receive my training certificate (or card).**

If you feel you received fraudulent training, then you may contact the closest area office to file a complaint or you may call 1-800-321-OSHA (6742).

#### **7. What type of PPE do workers need to wear when working on the oil spill cleanup?**

OSHA is aggressively ensuring that BP complies with HAZWOPER requirements, including the provision of required protective equipment to all workers involved in the clean up. OSHA has required BP to provide protective gloves, boots and, where appropriate, coveralls to all workers involved in clean up operations. Skin irritation is a primary concern for those handling weathered oil.

Right now, the following workers must be provided respirators: those working at the source, where the oil is leaking, those decontaminating booms and other equipment with power washers and those workers burning oil. OSHA and other Federal agencies have reviewed all of BP's monitoring data, as well as conducted their own independent monitoring. OSHA has already taken over 1,000 samples, and other agencies have also taken relevant measures. Except for workers working at the source and the other areas just mentioned, we have not seen any levels that are of concern—using the lowest recommended limits we can find.

Should OSHA find that the hazard characteristics of the oil change or should OSHA identify any other toxic chemical threats to worker health, we will immediately assess and readjust our training and worker protection requirements. Accordingly, all workers shall also be given training on using the PPE and when the PPE must be replaced. The need for additional PPE is dependent on the type of work the worker will be involved in. Caller should direct his/her inquiry for additional PPE to his/her employer.

If a caller feels that he/she is working in a hazardous condition without appropriate PPE, refer caller to the area office near their worksite.

If the caller wants more information—here is more information on the use of respirators:

The guidance lists the types of chemicals and other hazards workers face while doing different jobs. It recommends that workers on vessels involved in source-control and burning oil, as well as workers who are pressure washing oily PPE and other equipment, use respirators for certain situations:

**Vessel Activities near the Leak:** Respirators are recommended for some jobs to protect against breathing in the chemicals in crude oil. Chemical levels in the air can vary and spikes in chemical levels can happen because sea, weather, and source conditions change. If spikes are expected or indicated by an exposure assessment for a specific task, or if workers report symptoms or health effects, then respirators should be used. Workers should be given a half-face elastomeric respirator with organic vapor/P100 cartridges. When eye protection is also needed, workers should be given a full-face elastomeric respirator with organic vapor/P100 cartridges.

**Vessels Involved in Burning Oil:** Respirators are not needed in most cases because vessels move far upwind of the burn site. But, because winds shift, respirators should be available to crews on these vessels. If the wind shifts and the burn plume moves towards the vessel, then workers should be given a full-face elastomeric respirator with organic vapor/P100 cartridges. A half-face elastomeric respirator

with organic vapor/P100 cartridges could also be used as long as it is used with non-vented safety goggles.

**Pressure Washing Oily PPE and Equipment:** Pressure washing oily PPE and equipment can create oil mist. If workers are close enough that they could breathe in the oil mist while using the pressure washer or helping with the operation, then they should be given a P100 disposable filtering facepiece along with the other eye and face protection they are required to use.

For more information please go to the Interim Guidance for Protecting Deepwater Horizon Response Workers and Volunteers at <http://www.cdc.gov/niosh/topics/oilspillresponse/protecting/general.html>.

Other Information--Workers who report symptoms of illness should be directed to the local area office.

**8 I lost my training card. How can I get a new card?**

A worker that needs to replace his training certificate or card must request a replacement certificate/card from the trainer (or training company). OSHA does not keep any worker training records.

**9. I have a great idea on controlling and cleaning up this oil spill. How do I get OSHA endorsement?**

OSHA does not endorse or approve of products or services. The Unified Command for the BP Oil Spill has established several venues for submitting suggestions relating to oil clean up. To offer your idea or service you may submit them to BP at [www.horizonedocs.com](http://www.horizonedocs.com).

**10. Why is OSHA not making inspections and issuing citations?**

Currently, OSHA is not using enforcement as a tool to achieve compliance. So far, BP has been fixing problems when OSHA points them out, even when OSHA recommendations go above and beyond existing OSHA standards. OSHA has conducted over 1500 inspections since the clean-up effort began. When OSHA finds safety problems on site visits or learns about them from workers, it brings them to the attention of BP and makes sure they are corrected. OSHA also raises its concerns through the Unified Command so they are addressed across the entire response area. OSHA is ensuring that workers are provided, free of charge, appropriate personal protective equipment such as boots, gloves and other protective equipment as needed.

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