

Hazardous Waste Operations and Emergency Response (HAZWOPER)

1. Purpose

USPL has established a HAZWOPER program to comply with OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) Standard (CFR 1910.120).

USPL's program is designed to:

- Protect personnel from exposure to vapors and other hazards when responding to an emergency involving hazardous materials.
- Ensure that all BP personnel are trained at the appropriate level for their potential role in a HAZWOPER release.

2. Scope

This policy applies to the response to hazardous substance releases that cannot be contained, controlled, cleaned-up and removed by employees in the immediate release area or maintenance personnel, and require assistance from outside personnel (such as contractors, fire departments, BP personnel who don't have responsibilities for the asset, and other local agencies). Due to the potential for employee exposure to a hazardous substance during an emergency response, the applicable section of the HAZWOPER Standard that impacts USPL is 29 CFR 1910.120(q).

The following policies, procedures and programs are applicable to or referenced in this policy.

• Air Monitoring	• Hazard Communication
• Permit to Work	• Hot Work
• Benzene	• Hydrogen Sulfide
• Security Plans	• Personal Protective Equipment
• Emergency Action Plan or Emergency Response Plan	• Respiratory Protection
• Excavation	

3. Minimum Requirements

	Minimum Requirements	Supporting Documentation
1.	All employees shall be trained and certified based on the role they will perform in the emergency response prior to responding to a HAZWOPER release.	Section 6
2.	All contract personnel responding to an emergency release shall be trained based on the role they will perform in the emergency response.	Section 7

3.	<p>Skilled support personnel not serving in a specific HAZWOPER Emergency Responder role shall receive an initial briefing that includes the following:</p> <ul style="list-style-type: none"> • Instruction in donning and working in PPE • Information on the chemical hazards involved • Information on the duties to be performed 	Section 7
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4. Definitions

Decontamination—The removal of hazardous substances from employees their clothing and equipment to the extent necessary to preclude the occurrence of foreseeable adverse health effects.

DOT Emergency Response Guidebook—A guide to aid first responders to quickly identify the specific or generic classification of the materials involved in an incident, and protecting themselves and the general public during the initial response phase of the incident.

HAZWOPER Emergency Responders Roles

First Responder Awareness (Level 1)—Personnel who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They would take no further action beyond notifying the authorities of the release.

First Responder Operations (Level 2)—Personnel who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures.

Hazardous Material Technician (Level 3)—Personnel who respond to releases or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder operations level responder in that they will approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance.

Hazardous Material Specialist (Level 4)—Personnel who respond with and provide support to hazardous materials technicians. Their duties parallel those of the hazardous materials technician, however, the Specialist’s duties require a more directed or specific knowledge of the various substances they may be called upon to contain. The hazardous materials specialist would also act as the site liaison with Federal, state, local and other government authorities in regards to site activities.

On Scene Incident Commander (Level 5)—Employees designated by the company to assume control of the incident scene beyond the First Responder level, who can implement the incident command system and specific emergency response plans.

HAZWOPER Release—Requires a response effort by employees from outside the immediate release area or by other designated responders (i.e., mutual aid groups, local fire departments, Oil Spill Response Organizations (OSROs), etc.) to an occurrence which results, or is likely to result, in an uncontrolled release of a hazardous substance. Contrast this to an Incidental Release.

Hazardous substance—Any substance designated or listed under EPA Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Section 103, US DOT defined Hazardous Material Section 172.101, or hazardous waste to which exposure results or may result in adverse effects on the health or safety of employees

Hot Zone/Exclusion Zone—Area immediately surrounding a spill, leak, or discharge of hazardous material(s) which extends far enough to prevent adverse health and safety effects from the release.

Incidental Release -- A release of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel. These releases are not considered to be emergency responses (HAZWOPER releases) within the scope of this policy. Responses to releases of hazardous substances where there is no potential safety or health hazard (i.e., fire, explosion, or chemical exposure) are not considered to be emergency responses. Incidental releases are limited in volume quantity, pose no safety or health threat to employees working in the immediate vicinity of the spill, and do not have the potential to become an emergency within a short time. Contrast this to a HAZWOPER Release.

Note: Responders to incidental releases must follow local procedures which may include additional PPE and air monitoring.

Incident Command System (ICS)—A combination of facilities, equipment, personnel, procedures, and communication operating within a common organizational structure with responsibility for the management of resources assigned to response operations.

Post-emergency response—That portion of an emergency response performed after the immediate threat of a release has been stabilized or eliminated and the cleanup of the site has begun. *Note:* The response will continue until USPL Operations can transition to manage the response with internal resources, policies and procedures.

Skilled support personnel —Those who are skilled in operation of certain equipment, e.g. mechanized earth moving or digging equipment or cranes and hoisting equipment, who are needed temporarily to perform immediate emergency support work, and are potentially exposed to the hazards of an emergency response scene.

5. Roles and Responsibilities

5.1. All Employees

- A. Complete assigned training as listed in the Learning Management System.

5.2. HSSE Manager

- A. Complete the annual certification identifying how employees maintained competency for their assigned HAZWOPER role.

6. General Requirements

The HAZWOPER program is designed to protect response personnel from overexposure to harmful substances, and minimize impact to the environment and the communities where we operate.

- A. Personnel shall only respond to a HAZWOPER release in a manner consistent with their certified training level.
- B. Initial hot zones shall be confirmed using air monitoring techniques when appropriately trained personnel become available to the response. The DOT Emergency Response Guidebook may be used to initially delineate the Hot Zone, or Exclusion Zone. Hot zones cannot be reduced until confirmed by air monitoring.
- C. Designated responders (e.g., Level 3 HAZWOPER trained employees, local fire department, oil-spill mutual aid groups, and oil-spill response contractors) may respond inside the immediate release area if trained to do so and if they take appropriate safety precautions, such as wearing proper personal protective equipment (PPE) and conducting exposure monitoring readings.

- D. OSHA's HAZWOPER standard (29 CFR 1910.120(q)(6)(v)(B)) requires responders to know how to implement the Company's emergency response plans (ERP). USPL incorporates the HAZWOPER elements into existing plans such as the Facility Response Plan, Operations, Maintenance and Emergency Response (OMER) Plans, Pipeline Area Contingency Plans, and Dock Operations manuals. These plans collectively outline the following ERP elements:
- a) Pre-emergency planning and coordination with outside parties
 - b) Personnel roles, lines of authority, training, and communication
 - c) Emergency recognition and prevention
 - d) Safe distances and places of refuge
 - e) Site security and control
 - f) Evacuation routes and procedures
 - g) Decontamination
 - h) Emergency medical treatment and first aid
 - i) Emergency alerting and response procedures
 - j) Critique of response and follow-up
 - k) PPE and emergency equipment

7. Employee HAZWOPER Training

7.1. OSHA Requirement

- A. Employees shall be trained to meet the level of response they will be expected to perform as outlined in section 6.2 below. Prior HAZWOPER training is transferable if it is relevant and if the employee has documentation of the training.

7.2. Emergency Response Categories and Competencies – Initial Training and Certification

- A. Training shall be based on the duties and function to be performed by each responder. The skill and knowledge levels required for all new responders shall be conveyed to them through training before they are permitted to take part in actual emergency operations on an incident. Training will be assigned through My Talent & Learning (MTL) after the supervisor has identified the employee's level of emergency response duties. The training objectives are summarized below for each level.
1. **First Responder Awareness (Level 1)** — First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas:
 - a) An understanding of what hazardous substances are, and the risks associated with them in an incident.
 - b) An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
 - c) The ability to recognize the presence of hazardous substances in an emergency.
 - d) The ability to identify the hazardous substances, if possible.
 - e) An understanding of the role of the first responder awareness individual in USPL's emergency response plans including site security and control and the DOT Emergency Response Guidebook.

- f) The ability to realize the need for additional resources, and to make appropriate notifications to the communication center.
2. **First Responder Operations (Level 2)** — First responders at the operational level shall have received at least 8 hours of training or have had sufficient experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level:
- a) Knowledge of the basic hazard and risk assessment techniques.
 - b) Know how to select and use proper personal protective equipment provided to the first responder operational level.
 - c) An understanding of basic hazardous materials terms.
 - d) Know how to perform basic control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available with their unit.
 - e) Know how to Implement basic decontamination procedures.
 - f) An understanding of the relevant standard operating procedures and termination procedures.
3. **Hazardous Material Technicians (Level 3)** — Hazardous materials technicians shall have received at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas:
- a) Know how to implement USPL's emergency response plans.
 - b) Know the classification, identification, and verification of known and unknown materials by using field survey instruments and equipment.
 - c) Be able to function within an assigned role in the Incident Command System.
 - d) Know how to select and use proper specialized chemical personal protective equipment provided to the hazardous materials technician.
 - e) Understand hazard and risk assessment techniques.
 - f) Be able to perform advanced control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available with the unit.
 - g) Understand and implement decontamination procedures.
 - h) Understand termination procedures.
 - i) Understand basic chemical and toxicological terminology and behavior.
4. **Hazardous Material Specialists (Level 4)** — Hazardous materials specialists shall have received at least 24 hours of training equal to the technician level and in addition have competency in the following areas:
- a) Know and implement the local emergency response plan.
 - b) Understand classification, identification, and verification of known and unknown materials by using advanced survey instruments and equipment.
 - c) Know the state emergency response plan.
 - d) Be able to select and use proper specialized chemical personal protective equipment provided to the hazardous materials specialist.
 - e) Understand in-depth hazard and risk techniques.
 - f) Be able to perform specialized control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available.

- g) Be able to determine and implement decontamination procedures.
 - h) Have the ability to develop a site safety and control plan.
 - i) Understand chemical, radiological, and toxicological terminology and behavior.
5. **On Scene Incident Commander (Level 5)** — On scene incident commanders shall receive at least 24 hours of initial training equal to the first responder operations level and in addition have competency in the following areas:
- a) Know and be able to implement the USPL incident command system.
 - b) Know how to implement the USPL emergency response plans.
 - c) Know and understand the hazards and risks associated with employees working in chemical protective clothing.
 - d) Know how to implement the local emergency response plan.
 - e) Know of the state emergency response plan and of the Federal Regional Response Team.
 - f) Know and understand the importance of decontamination procedures.

7.3. Annual Refresher Training and Re-Certification

- A. According to OSHA, those employees who are HAZWOPER trained shall receive annual refresher training of sufficient content and duration to maintain their competencies, or shall demonstrate competency in those areas at least yearly.

Note: Understand that the HAZWOPER Certification for Employees is BP's certification that a performance oriented training requirement has been met by a variety of methods, e.g. MTL training, instructor led training, self-study, knowledge of one's job responsibilities, participation in drills and exercises, participation in actual emergency responses, etc. Most of these activities are documented in MTL, and can include the Pipeline or Terminal Skills curriculum and Operator Qualification records.

- B. A statement shall be made of the training or competency of each employee assigned a HAZWOPER role and the methodology used to determine competency. USPL shall keep a record of the methodology used to demonstrate competency.
- 1. Competency shall be demonstrated in one of the following ways:
 - a) Participating in an actual HAZWOPER response.
 - b) Participating in a drill.
 - c) Meeting assigned and relevant safety and environmental training requirements that prepare the employee for their level of emergency response, i.e. Category 1 training assigned in the Learning Management System.
 - d) Demonstrating by experience their ability to respond to an emergency within their level of training.
- C. The HSSE Manager shall complete the HAZWOPER certification annually for all employees assigned a HAZWOPER role.
- 1. Annually, e.g., February, the HSSE Manager will request Priority 1 MTL records for employees assigned HAZWOPER Level 1, 2, 3, 4 and 5 emergency response roles.
 - 2. Employees who have completed Priority 1 training will be certified as maintaining their competency for their identified HAZWOPER level.

3. Employees who have not completed all Priority 1 training may be certified using one of the following methods as determined by the HSSE Manager from the MTL records or in consultation with the employee's supervisor:
 - a) Participated in an actual HAZWOPER response. Include date of response.
 - b) Participated in a drill. Include date of drill.
 - c) Demonstrated by experience their ability to respond to an emergency within their level of training. Provide statement of what their experience was that maintains their competency.
4. Employees who cannot be certified as maintaining their competency will not be allowed to respond to an emergency response where they have potential exposure to harmful substances.
5. The certification will be filed in the HAZWOPER folder in DRM until the next annual certification.
6. CTM will be the management system to prompt this annual re-certification.

8. Contractor HAZWOPER Training

- A. Personnel who are skilled in the operation of certain equipment (Skilled Support Personnel), such as mechanized earth moving or digging equipment or crane and hoisting equipment, and who are needed temporarily to perform immediate emergency support work, are not required to be HAZWOPER trained. However, these personnel shall be given an initial briefing at the site prior to their participation in any emergency response. All other appropriate safety and health precautions provided to other responders shall be used to assure the safety and health of these personnel. The initial briefing shall include the following as set forth in 29 CFR 1910.120(q)(4):
 1. Instruction in the wearing of appropriate personal protective equipment,
 2. What chemical hazards are involved,
 3. What duties to be performed.
- B. All other contract personnel responding to an emergency shall be HAZWOPER trained for the role they will perform in the emergency response.
- C. Contractors being utilized for the post-emergency response phase (cleanup operations) shall meet the 40-hour training requirements set forth in 29 CFR 1910.120(q)(11).

9. Medical Surveillance and Consultation

- A. Any emergency response employee who exhibit signs or symptoms which may have resulted from exposure to hazardous substances during the course of a HAZWOPER release either immediately or subsequently, shall be provided with immediate medical consultation.

10. Post-Emergency Response Operations

- A. HAZWOPER also regulates post-emergency response operations (cleanup operations). OSHA makes a clear distinction between emergency response and cleanup (post-emergency operations). As long as an emergency response team controls the site, the emergency situation continues to be in effect. Once the On Scene Incident Commander has declared the emergency response activity finished, any additional activities shall be considered a post-emergency operation (cleanup).

- B. The response team will remain active until all response issues can be managed with internal resources, policies, and procedures. A general plan consistent with Incident Command System procedures shall be developed to transition the response to USPL Operations.
- C. If USPL uses non-BP personnel in a cleanup operation where it is necessary to remove hazardous substances (such as contaminated soils or other elements of the natural environment) from the leak or spill site, USPL shall have the work performed in a way that meets the requirements of paragraphs (b) through (o) of the HAZWOPER regulation (CFR 1910.120) which addresses the following:
 - 1. An organizational structure;
 - 2. A comprehensive work plan;
 - 3. A site-specific safety and health plan which need not repeat the standard operating procedures in 6 below;
 - 4. The safety and health training program;
 - 5. The medical surveillance program;
 - 6. USPL's and the contractor's standard operating procedures for safety and health; and
 - 7. Any necessary interface between general program and site specific activities.
- D. If the cleanup is done at a USPL facility using only BP employees, the requirements of 29 CFR 1910.120, paragraphs (b) through (o) do not have to be met if these employees have completed the following training requirements:
 - 1. Emergency Planning, 29 CFR 1910.38 (a)
 - a) This is the emergency action plan contained in the Facility Response or Emergency Response plan which includes evacuation plans and headcount.
 - 2. Respiratory Protection, 29 CFR 1910.134
 - 3. Hazard Communication, 29 CFR 1910.1200
 - 4. Appropriate safety and health training specific to tasks employees perform, such as PPE and decontamination procedures

11. References

- 1. Occupational Safety and Health Administration, Department of Labor; 29 CFR 1910.120. "Hazardous Waste Operations and Emergency Response (HAZWOPER)".

Appendix I – Sample HAZWOPER Certification for Employees

Employee Name	HAZWOPER Level (1, 2, 3, 4, 5)	Methodology (A, B, C, D)	Date (if A or B)	Comment

By your signature, you are attesting the employees listed have received training or demonstrated experience that they can competently perform their assigned emergency response duties.

Supervisor Signature

Date

HAZWOPER Levels (A full list of training objectives is contained in the USPL HAZWOPER policy.)

1. First Responder Awareness (Level 1) – Personnel who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They would take no further action beyond notifying the authorities of the release.
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4. Hazardous Materials Specialist (Level 4) – Personnel who respond with and provide support to hazardous materials technicians. Their duties parallel those of the hazardous materials technician, however, those duties require a more directed or specific knowledge of the various substances they may be called upon to contain. The hazardous materials specialist would also act as the site liaison with Federal, state, local and other government authorities in regards to site activities.
5. On Scene Incident Commander (Level 5) – Employees designated by the company to assume control of the incident scene beyond the First Responder level, who implement the incident command system and specific emergency response plans.

Certification Methodology

- A. Participated in an actual HAZWOPER response. Include date of response.
- B. Participated in a drill. Include date of drill.
- C. Met assigned and relevant safety and environmental training requirements that prepare the employee for their level of emergency response. Consult MTL for documentation of training.
- D. Demonstrated by experience their ability to respond to an emergency within their level of training. Provide statement of what their experience was that maintains their competency.

Appendix II

HAZWOPER Release Decision Tree

