



<b>Document Type</b>	<b>Emergency Management Program Standard Operating Guidance</b>
<b>Title</b>	<b>Job Hazard Analysis and Health and Safety Training Programs</b>
<b>Document Number</b>	<b>138E</b>
<b>Last Updated by</b>	
<b>Approval</b>	

**1.0 Purpose and Scope**

This is the Job Hazard Analysis (JHA) program for the Emergency Management Program (EMP). The JHA program examines two groups in EMP: on-scene coordinators (OSCs) and non-OSC staff to include managers, planners, contract specialist, administrative, and coordinators. This JHA program further distinguishes the non-OSCs group by those who engage in field activities from those who do not.

This SOG provides the citations for requiring a JHA program, a description on how these requirements are being met, a JHA for the OSC and non-OSC position, and a health and safety training program.

**2.0 Citations and Requirements**

- SHEM Guideline 56, *Job Hazard Analysis* (August 2005)
- EPA Order 1440.2 *Safety and Health Training Requirements for Agency Employees* (January 10, 2011)
- SHEM Guideline 51, *Safety, Health and Environmental Management Training* (January 2011)

SHEM Guideline 56 calls for the Safety, Health and Environmental Management Program manager (SHEMP manager) or other designated health and safety personnel to implement a JHA program. Guideline 56 states that the requirements of a JHA program apply to all areas and operations of each EPA facility.

Guideline 56 provides the following citations as the authority to require a JHA program:

- 29 CFR Part 1960, Federal Employee Occupational Safety and Health Programs

- Executive Order 12196, Occupational Safety and Health Programs for Federal Employees

The minimum requirements for a JHA program include:

- Performing JHAs by individuals qualified to recognize and evaluate hazards of the working environment ;
- Documenting verbal or written reports of unsafe conditions and follow-up inspections, response and corrective actions, and abatement plans, as appropriate;
- Informing affected employees of any identified workplace hazards;
- Posting notices of unsafe or unhealthful working conditions; and
- Responding in writing to employee reports of potentially unsafe or unhealthful conditions.

### **3.0 JHA and Health and Safety Training Programs**

There is a complimentary relationship between Guideline 56 and EPA Order 1440.2. The JHA program calls for training in “safe work procedures and controls” while the EPA Order calls for training “that meets a particular need identified through a JHA,…”

At this programmatic level (i.e., we are not doing a site-specific JHA), health and safety training becomes the principle procedure available to control identified associated hazards.

The core requirement of a JHA program (see above) is the JHA itself. A JHA is a “systematic technique to identify, characterize, and evaluate the demands, potential health, and physical hazards or risks associated with an employee’s job description and tasks. The purpose of JHA is to ultimately develop and confirm recommended safe work procedures and controls to eliminate/control the associated hazards.”

#### **3.1 - Applicable Initial EPA Health and Safety Training**

The EPA Order requires EPA staff to take initial health and safety training with annual refresher training. The following lists the types of initial training required by the EPA Order and who in EMP needs to take the training:

- General safety and health orientation training – All EMP
- Job-specific health and safety training for employees who engage in:
  - Field activities – OSCs and selected EMP staff
  - Laboratory activities – not applicable
  - Other specialized activities - OSCs

The job-specific health and safety training is commonly referred to as 24-hour health and safety training.

OSCs are considered to engage in specialized activities due to cleanup at uncontrolled hazardous waste operations and emergency responses. The EPA Order calls for more training beyond the initial 24-hour health and safety training for field activities. The OSCs meet this additional training with the initial 40-hour HAZWOPER training as well as training called for in the EMP OSC Safety and Health Program.

The requirements of the General Safety and Health Orientation training will be met pending direction from SHEMP manager.

While the EPA Order provides a list of core training under the initial training types, it defers to a JHA to identify additional job-specific training.

The Health and Safety Training Programs are discussed in the respective JHAs below.

#### **4.0 Fulfilling JHA Program Requirements**

Each EPA region has identified a Health and Safety Program Contact (HSPC) for their OSCs who serve on a national health and safety workgroup. The EMP has assigned its HSPC the additional duty as the designated health and safety personnel called for under Guideline 56 to implement this JHA program in coordination with the SHEMP.

Employees and their supervisors in the EMP are considered best qualified to recognize and evaluate hazards of the working environment as called for under their duty assignment. Assistance can be provided by the HSPC and the SHEMP manager.

Employees are responsible for knowing the extent of their individual occupational safety and health training. Employees should notify their supervisor of any hazardous work situation and make suggestions for corrective measures. Employees are responsible for applying the knowledge, skills, and techniques acquired through training in a manner that will help ensure their safety and health and that of fellow workers. Employees must participate in safety and health training provided by the Agency.

Training will be recorded by the HSPC in the on-line Field Readiness Module (FRM) portion of the Emergency Management Portal.

The adequacy of this JHA and any corresponding training will be examined at the annual job performance interview (PARS) or sooner if a change in workplace conditions or duties occur.

#### **4.1 - OSC**

This JHA program incorporates by reference the EMP's written safety and health program (SAHP) and the emergency response plan (ERP) both of which are

required by HAZWOPER. The SAHP calls for a health and safety plan (HASP) in which a JHA is done on a site specific level.

Guideline 56 requires a written certification that the employee performing the specified job has received and understood the work procedure and control training. OSCs receive a certification as having met 8-hour health and safety refresher training as required by HAZWOPER and EPA Order 1440.2. OSCs typically take extra hours of health and safety training beyond the required minimum 8-hour annual refresher.

This JHA program affirms that the EMP (likely the OSC for a site or the HSPC) will document reports of unsafe conditions and how the EMP follows-up on those reports. EMP calls for two health and safety site audits per year. As part of that audit, the inspector will look for posting of unsafe and unhealthful working conditions. Affected employees will be informed of any workplace hazards identified in the JHA of the HASP. In addition, the SAHP addresses the informational program requirements of HAZWOPER which are similar in intent to hazard communication requirements. Daily tail-gate safety briefings also inform employees of any identified workplace hazards.

This JHA has been performed by the HSPC who is an OSC and thus qualified to recognize and evaluate hazards of the working environment that the OSC may encounter.

#### **4.2 – Non-OSC**

Non-OSCs may be engaged in field activities either as required by their job duties in EMP or as a Response Support Corps (RSC) member. Non-OSCs working in their RSC-role are usually engaging in field activity to support OSCs responding under their National Contingency Plan authority or a National Response Framework mission assignment.

Non-OSCs not trained under HAZWOPER will not work inside the exclusion zone at an uncontrolled hazardous waste operation. A HASP prepared under HAZWOPER often addresses health and safety issues in the support zone. Health and safety plans required under other authorities may be in place that will also serve to protect the non-OSCs.

EMP acknowledges the requirement that all employees should participate in required training sessions. As such, this JHA program incorporates by reference EPA Order 1440.2 – *Safety and Health Training Requirements for Agency Employees*. EMP expects the non-OSCs to participate in required training sessions.

Guideline 56 requires a written certification that the employee performing the specified job has received training on and understands the safe work procedures and controls needed for their specified job. Non-OSCs will either self-certify or

be certified that they have met all requirements of the Field Safety General Awareness Training (initial 24-hour health and safety training) and for the annual 8-hour health and safety refresher training as required by the EPA Order.

This JHA program affirms that the EMP will document reports of unsafe conditions and how the EMP follows-up on those reports. Non-OSCs will self assess and immediately report unsafe and unhealthful working conditions to the SHEMP manager.

## **5.0 OSC JHA**

This JHA can best be described as a programmatic JHA because the work environment, location, conditions for the OSC is unknown thus the hazards and steps to take to remedy these hazards are also unknown. This programmatic JHA is based on the major duties and responsibilities as described in the position description of an OSC.

### **5.1 - The Purpose of the Job**

The OSC responds to releases of hazardous substances and petroleum products under CERCLA or OPA, respectively. The response may involve assessment, stabilization, and cleanup of the hazardous substance or petroleum product. The response can take place in any conceivable location, time, and weather condition. The EMP expects the OSC to be able to work safely in a hazardous environment with proper training on awareness and use of PPE. As stated in the PPE Program, EMP expects engineering and administrative controls will be considered before relying on PPE for protection.

### **5.2 - Basic Job Steps**

- Respond to scene of incident
- Assess the situation and determine if release needs to be secured and stabilized or is ready for cleanup.
- Write a HASP before cleanup begins
- Conduct cleanup
- Demobilize

### **5.3 - Potential Hazards**

While the OSC may not encounter all these hazards, the nature of the OSC work requires this JHA to anticipate the more likely hazards.

Exposure to hazardous substances, which include, but are not limited to:

- Industrial chemicals
- Asbestos
- Mercury
- Pesticides
- Chemical Warfare agents
- Biological agents
- Radiation

- Bloodborne pathogens

Exposure to physical stress, which include, but are not limited to:

- Noise
- Cold
- Heat
- Vibration
- High altitude
- Physical exertion
- Long hours with fatigue

Exposure to physical hazards, which include, but are not limited to:

- Slips, trips, and falls
- Driving
- Animals, insects, and reptiles
- Unfavorable weather conditions
- Rough terrain

Confined Spaces, found in industries such as:

- Ships
- Pulp, paper, and paperboard mills
- Telecommunications
- Sewer
- Petroleum Refineries
- Chemical storage and/or distribution

#### **5.4 - Recommended Actions or Procedures**

The following actions and procedures are already in place. This JHA does not recommend any additional actions or procedures.

- EPA Region 10 OSCs operate under the following written health and safety programs which are incorporated by reference:
  - Medical surveillance
  - Radiation safety
  - Respiratory protection
  - Bloodborne pathogen awareness
  - PPE
  - Physical stress
- EPA Region 10 OSCs follow a written health and safety training program which has identified the needed training based on the hazards identified in this JHA. Much of the training requires annual or biennial refresher. The training is tracked and recorded in the FRM.
- When a specific site is identified the OSC will conduct a site-specific JHA in the process of producing a HASP. The same thought process used in this JHA can be used in the HASP JHA: 1) Basic Job Step, 2) Potential Hazards, 3) Recommended Action or Procedures.

- When operating under ICS, the process of completing a 215A form will meet the requirements of a JHA.
- An approved national Voluntary Fitness for Duty program is implemented for those OSCs that seek proactive efforts to maintain physical conditioning to ensure the ability to wear appropriate levels of PPE under the given potential hazards, as listed above, that could be encountered on the job.

## **5.5 – Health and Safety Training Program for OSCs**

EMP acknowledges the requirement that all employees should participate in required training sessions. As such this JHA program incorporates by reference SOG 112, *Health and Safety Training and Readiness Requirement for On-Scene Coordinators*.

### **6.0 Non-OSC JHA**

This JHA is applicable to employees and supervisors who are not OSCs. EMP has chosen to develop a JHA for each of two types of non-OSCs: Those employees and supervisors who do engage in field activities as defined under the EPA Order and those who do not. “Field activities” means EPA program activities that are conducted by EPA employees outside of EPA administered facilities.

Thus each EMP position has been evaluated to determine if the duty calls for engaging in field activities and are so listed in Attachment A.

EMP interprets the definition of field activities as those activities that might require use of PPE such as safety boots, safety glasses, safety vest, hard hat, gloves, hearing protection, personal flotation device, etc. For the purposes of this JHA, travel to a working location that does not require PPE (such as an office environment), even one that is in support of an emergency response such as an EOC or an ICP, does not constitute a field activity. An employee, who is visiting a site which may call for temporary use of a PPE, will not be considered as engaging in field activities as long as the employee is escorted by an authorized site employee and will not engage in prolonged work at that site.

However, this definition does not preclude anyone of authority at any site to interpret “field activities” more broadly and thus allow only those meeting the 24-hour health and safety training requirements of EPA Order 1440.2 to come on site.

The non-OSC will participate in any site-specific safety training or tailgate safety briefing at such sites.

For non-OSCs who do not engage in field activities, the supervisor has determined that they only require general safety and health orientation training. Those employees are identified in Attachment A. No further JHA is needed.

For those non-OSCs who do engage in field activities, the supervisor has determined that they require general safety and health orientation training as well as Field Safety General Awareness Training<sup>1</sup>. The job-specific training will require an annual 8-hour refresher. The JHA continues below.

### **6.1 - The Purpose of the Job**

This JHA is applicable to non-OSCs who engage in field activity either under their regular duties in planning and prevention or in a response as an RSC member.

Non-OSCs do not directly respond to releases of hazardous substances and petroleum products under CERCLA or OPA. Rather, the non-OSCs are usually working in assignments that support the overall response, but are not directly overseeing or managing the operational or tactical teams in the field. The EMP expects non-OSCs to be able to work safely in controlled non-hazardous environments with proper training on personal safety and awareness. EMP also expects that all engineering and administrative controls will be in place before a non-OSC attempts to work in such environments.

### **6.2 - Potential Hazards**

While a non-OSC may encounter these hazards, usually the nature of the non-OSC work is predictable and controlled:

Exposure to physical stress, which include, but are not limited to:

- Noise
- Cold
- Heat
- Vibration
- High altitude
- Limited physical exertion
- Long hours with fatigue

Exposure to physical hazards, which include, but are not limited to:

- Slips, trips, and falls
- Vehicle driving
- Animals, insects, and reptiles
- Unfavorable weather conditions
- Rough terrain

Exposure to other possible hazards such as:

---

<sup>1</sup> Field Safety General Awareness Training is the term used in SHEM Guideline 51 for the job-specific safety and health training.



- Poorly secured energy sources or mechanical hazards
- Fire safety
- Bloodborne or airborne pathogens
- Human factors/ergonomics

### **6.3 - Recommended Actions or Procedures**

The following actions and procedures are already in place. This JHA does not recommend any additional actions or procedures.

- EMP non-OSCs will operate under the Region 10 health and safety program as provided by the SHEMP manager.
- EMP non-OSCs will follow a written health and safety training program provided below.
- When operating under ICS, the process of completing a 215A form will meet the requirements of a JHA.

### **6.4 – Health and Safety Training Program for Non-OSCs**

EMP acknowledges the requirement that all employees should participate in required training sessions.

This training program requires that non-OSCs who engage in field activities complete the initial basic Field Safety General Awareness Training (Often referred to as the 24 hour health and safety training). Training is offered in-house by the SHEMP manager.

#### Required – 18 hours

1. Basic Toxicology
2. Chemical Hazards and Reactions
3. Decontamination
4. Driver Safety – Field Activities\*
5. EPA’s Occupational Health and Safety Program – Field Activities
6. Hazard Communication\*
7. Hazardous Energy Sources and Mechanical Hazards
8. Hazardous Materials Transportation Awareness
9. Heat and Cold Stress
10. Ladders
11. Medical Emergencies in Field Activities
12. Medical Surveillance and Workers’ Compensation
13. Natural Hazards
14. Occupational Noise Exposure
15. Personal Protection Equipment\*
16. Planning and Preparation for Field Activities
17. Portable Fire Extinguishers
18. Respiratory Protection

Elective – 6 hours (choose 6 hours from below. These are all awareness level training. SHEMP manager review job duties and potential hazards (JHA) with field employees to select appropriate training.

19. Air Monitoring – Field Activities
20. Aircraft Safety
21. Biological Safety
22. Blood borne Pathogens
23. Boating Safety Awareness
24. Confined Space Entry Awareness
25. Excavation/Trenching and Shoring
26. Fall Protection
27. Field Sampling Hazards
28. Hazardous Waste Operations and Emergency Response Awareness
29. Hoisting and Lifting
30. Human Factors/Ergonomics
31. Industrial Plants
32. Laboratory Safety for Field Workers
33. Mine Safety
34. Pesticides
35. Radiation Safety Awareness
36. Scaffolding
37. Stack Sampling
38. Subsurface Investigations

Per SHEM Guideline 51, “The remaining training courses (hours) are electives and shall be determined by the SHEMP manager and the first-line supervisor based upon the employee’s duties. These elective courses may be comprised of any of the remaining modules listed previously or other courses identified by the SHEMP manager.”

The SHEMP manager will maintain training records for five years as well as record the training in a regional database. The non-OSCs need to inform the HSPC of their 8-hour refresher training if they wish for it to be recorded in the national FRM database. But this is not required.

The HSPC will not maintain a hard copy of non-OSC training. As such the employee is encouraged to keep a copy of all training records.

Field training such as tailgate safety briefings or safety orientations is considered a component of this training program. The non-OSC who is deployed to support an incident as an RSC member will check into the Incident Command Post (ICP) and seek a briefing by the Safety Officer regarding existing and known hazards related to their task for which they have been deployed.

### Refresher Training

Annual 8-hour refresher training is required on any of the topics above and must include Driver Safety, PPE, and Hazard Communication (those topics above with asterisk). There are two ways to complete refresher training:

- Attend 8-hour refresher training provided periodically throughout the year by the SHEMP manager.
- Log H&S training they receive throughout the year.

Often, attending any 8 hours of the 24-hour initial basic Field Safety General Awareness training will suffice. However, one should not overlook the three required training mentioned above.

For the logged-training approach, topics for refresher may be comprised of other courses to those listed above. Guideline 51 requires that applicable topics shall be determined by the SHEMP manager and the first-line supervisor based upon the employee's duties. This determination shall be met by the employee providing the first-line supervisor and the SHEMP manager the logged training (See Attachment B). Unless the employee hears otherwise from the SHEMP manager or first-line supervisor, the logged training will be considered adequate.

Training taken at EMP's biannual OSC spring and fall training contains topics that apply towards annual 8-hour health and safety refresher and are provided to the first-line supervisor and SHEMP Manager prior to the training.

### Grandfathering of Initial 24-Hour Training

Non-OSCs who have inadequate record of training to meet the initial basic Field Safety General Awareness Training should take in-house training offered by the SHEMP manager.

As an alternative, EMP recognizes that most of its employees have worked at EPA for many years and have attended many types of health and safety training throughout their career. Any non-OSC who has taken previous health and safety training such as HAZWOPER may be able to use it to fulfill the initial training requirements under the EPA Order. Attachment C has suggested language that can be put on EPA letterhead to document completion of training. The first-line supervisor of the non-OSC would sign the document.

ATTACHMENT A

**Applicable EPA Order 1440.2 Training  
Determined by JHA for EMP Staff**

NAME	POSITION	Training Required by JHA		
		General <sup>2</sup>	24-hour <sup>3</sup>	Specialized <sup>4</sup>
<b>Emergency Management Program</b>				
Field, Chris	Program Manager	Yes	No	No
Smith, Sharon	Administrative Support	Yes	No	No
Combes, Marcia	ARRT Liaison	Yes	No	No
Jamison, Myrna	Contracts Project Officer	Yes	No	No
<b>Emergency Response Unit</b>				
Terada, Calvin <sup>5</sup>	Unit Manager	Yes	Yes	Yes
Becker, Dale	Homeland Security Planner	Yes	Yes	No
Boykin, Michael	OSC	Yes	Yes	Yes
Carr, Matthew	OSC	Yes	Yes	Yes
Clark, Josie	Northwest Area Planner	Yes	Yes	No
Dettling, Diane	OSC	Yes	Yes	Yes
Garcia, Leticia	Sr. REOC IT Analyst	Yes	No	No
Knowles, Nicholas	Alaska Planner	Yes	Yes	No
Rees, David	OSC	Yes	Yes	Yes
Rodin, Jeffry	OSC	Yes	Yes	Yes
Smith, Andy	OSC	Yes	Yes	Yes
Whittier, Robert	OSC	Yes	Yes	Yes
Weigel, Greg	OSC	Yes	Yes	Yes
Zavala, Angie	OSC	Yes	Yes	Yes
<b>Emergency Preparedness and Prevention Unit</b>				
Moon, Wally	Unit Manager	Yes	No	No
Fowlow, Jeffrey	OSC	Yes	Yes	Yes
Franklin, Richard	OSC	Yes	Yes	Yes
Heister, Dan	OSC	Yes	Yes	Yes
Liverman, Earl	OSC	Yes	Yes	Yes
Parker, Kathy	OSC	Yes	Yes	Yes
Sibley, Michael	OSC	Yes	Yes	Yes
Wien, Janet	FRP Specialist	Yes	Yes	No

<sup>2</sup> General Safety and Health Orientation

<sup>3</sup> Field Safety General Awareness Training; Requires annual 8-hour refresher training

<sup>4</sup> Other Specialized Activities – Regulated Activities include working at uncontrolled hazardous waste operations and emergency responses, wearing respirators, operating in confined space, working with regulated hazardous substances such as asbestos, radioactive materials, chemical warfare agents, etc.

<sup>5</sup> Calvin Terada is a former OSC and continues to maintain his HAZWOPER training.



ATTACHMENT B

**Health and Safety Eight (8) Hour Refresher Log  
EPA Order 1440.2  
For Non-OSC Who Engages in Field Activities**

<b>NAME:</b>	<b>POSITION:</b>	<b>YEAR:</b>

<b>DATE</b>	<b>CLASS</b>	<b>CREDIT HOURS</b>	<b>LOCATION/METHOD</b>
	Driver Safety*	1.0	
	Hazard Communication*	1.0	
	Personnel Protective Equipment*	1.0	
	Elective 1	1.0	
	Elective 2	1.0	
	Elective 3	1.0	
	Elective 4	1.0	
	Elective 5	1.0	
	<b>TOTAL</b>	<b>8.0</b>	

I certify that I have completed the requisite annual 8-hours of health and safety refresher as required by EPA Order 1440.2.

\_\_\_\_\_

Signature

\_\_\_\_\_

Date

Instruction for use: This log is intended for the non-OSC to self-certify having met their annual 8-hour refresher as required under EPA Order 1440.2. This log may be used in lieu of attending a Region 10 EPA health and safety refresher set up by the SHEMP manager. The non-OSC is encouraged to record all relevant health and safety training for a calendar year and not just stop after 8 hours have been accumulated. Once the non-OSC is ready to self-certify, he/she should sign the log and send a copy to the SHEMP, their first-line supervisor, and the HSPC. A PDF copy with an electronic signature is acceptable instead of a hard copy. The SHEMP Manager will maintain this record for 5 years. The HSPC will log your refresher training into the FRM but will not maintain a copy of this log.

## ATTACHMENT C

### Initial 24-Hour Health and Safety Training Suggested Certification Language

Reply To  
Attn Of: ECL-116

#### MEMORANDUM

SUBJECT: Statement of Completion of Field Safety General Awareness Training

FROM: [Chris D. Field, Manager/Wally Moon/Calvin Terada]  
[Emergency Management Program/Emergency Preparedness and  
Prevention Unit/Emergency Response Unit]

TO: File

This memo is to certify that [**name of non-OSC**] has met the initial 24-hour Field Safety General Awareness training as required by EPA Order 1440.2. I have met with this employee to discuss past training and reviewed documentation of such. Per this review I am satisfied that the employee has met the Field Safety General Awareness training requirements.

In addition I have conducted a job hazard analysis for the duties of this employee. This JHA is documented in SOG # 138 *Job Hazard Analysis and Health and Safety Training Programs*. The JHA contains the health and safety training program based on the assigned duties.

The training program calls for annual 8-hour health and safety refresher which over period of time will review topics called for in the Field Safety General Awareness Training as well as other pertinent health and safety topics related to the duties of this employee.

CC: Grady Maxwell, SHEMP manager