



HAZWOPER / RCRA

Safety Council Solutions - Program Evaluation Form

CONTRACTOR NAME: _____

DATE: _____

ITEM NO.	CITATION REFERENCE	DESCRIPTION	COMMENTS
HAZWOPER / RCRA			
1	1910.120(e)(1)(i)(3)(i) (ii)(iii)(4)	Does the program provide for appropriate training before employees are allowed to work?	Equipment operators, general laborers, supervisors and management, etc., must be trained prior to being allowed to participate in or supervise field activities. The training should cover the use of personal protective equipment. The training should also cover work practices which minimize hazardous risks and safe use of engineering controls & equipment. General site workers (equipment operators, general laborers & supervisors) should receive a minimum of 40 hours of instruction and 3 days of field experience. Occasional workers (ground water monitoring, land surveying, & geophysical surveying, etc.) should receive 24 hours of instruction & 1 day of field experience. Workers that have to wear respirators are required to have an additional 16 hours & 2 days of field experience. Management & supervisors are to have 40 hours of initial training & 3 days of field experience. Proof of training must be documented & available.
2	1910.120(b)(1)	Does the employer have a written safety & health program for their employees involved in hazardous waste operations?	The program shall be designed to identify, evaluate, control safety & health hazards & provide for emergency response. The program should detail a specific chain of command, address task & objectives of the operations and address site specific procedures.
3	1910.120(f)	Does the program provide for medical surveillance?	The program must be provided at no cost to the employees. Employees who may be exposed to health hazards for 30 days or more a year or wear a respirator 30 or more days a year must be covered under the medical surveillance program. The medical surveillance program should also cover employees who are injured or develop symptoms due to exposure to hazards. Members of HAZMAT teams should also be covered by the medical surveillance program.
4	1910.120(g)(1)(i)	Does the program address engineering controls, work practices and personal protective equipment for employee protection?	Feasible engineering controls include the use of pressurized cabs or control booths on equipment, and/or the use of remotely operated material handling equipment. Engineering controls, work practices & PPE shall be used to reduce & maintain exposure limits.
5	1910.120(h)(1)(i)	Does the program address provisions for monitoring to be performed where there may be employee exposure to hazardous substances?	Air monitoring should be used to identify & qualify airborne levels of hazardous substances. The monitoring should address initial entry, periodic monitoring, possible IDLH & wherever exposure may be a possibility. The task-specific conditions & duration, and the hazards and potential hazards should be identified including a guide for PPE assessments.

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6	1910.120(k)(2)(ii)	Does the program provide for decontamination procedures?	A decontamination procedure shall be developed, communicated to employees & implemented before any employees or equipment may enter areas on site where potential for exposure to hazardous substances exists. The procedures shall be developed to minimize employee contact with hazardous substances or with equipment that has contacted hazardous substances.
7	1910.120(k)(2)(iii)	Does the program state that employees leaving contaminated area(s) are appropriately decontaminated?	All employees leaving a contaminated area shall be appropriately decontaminated; all contaminated clothing & equipment leaving a contaminated area shall be appropriately disposed of or decontaminated.
8	1910.120(k)(2)(iv)	Does the program designate that a site safety & health supervisor monitor the decontaminated procedures?	Decontamination procedures shall be monitored by the site safety & health supervisor to determine their effectiveness. When such procedures are found to be ineffective, appropriate steps shall be taken to correct any deficiencies.
9	1910.120(k)(3)	Does the program address the location of decontamination area(s)?	Decontamination shall be performed in geographical areas that will minimize the exposure of uncontaminated employees or equipment to contaminated employees or equipment.
10	1910.120(k)(5)	Does the program address decontamination of PPE and non-impermeable clothing?	PPE & equipment shall be decontaminated, cleaned, laundered, maintained or replaced as needed to maintain their effectiveness. Employees who non-impermeable clothing becomes wetted with hazardous substances shall immediately remove that clothing & proceed to shower. The clothing shall be disposed of or decontaminated before it is removed from the work zone.
11	1910.120(k)(6)	Does the program address the restriction of unauthorized employees in the decontamination change rooms?	Unauthorized employees shall not remove protective clothing or equipment from change rooms.
12	1910.120(k)(8)	Does the program address the availability of regular showers & change rooms if necessary?	Where the decontamination procedure indicates a need for regular showers & change rooms outside of a contaminated area, they shall be provided & meet the requirements of 29 CFR 1910.141. If temperature conditions prevent the effective use of water, then other effective means for cleansing shall be provided and used.

Disclaimer: The information contained in these forms, questionnaire and monitoring procedures is provided as written guidance to assist contractors in complying with the OSHA regulations and/or operator requirements. SCS, the operators who participated in the development of this program and their employees disclaim all warranties both express and implied. The information presented here will give contractors a reference document, which should be used as guidance or as a "first step" towards getting your company into compliance. This monitoring program is based on sound safety and environmental concerns. We urge contractors to view their OSHA and DOT compliance efforts as a way to make their workplace safer for their employees.

Each contractor is still responsible for full compliance of all applicable State and Federal regulations.