OSH INFORMATION MEMORANDUM   92-X-89

TO: All OSH Directors, Supervisors, and Field Personnel

FROM: William Lybrand, Director of OSH

DATE: February 14, 1992

SUBJECT: Training for Employees under section 1910.120(q)(6)

Purpose.

This memorandum clarifies the South Carolina Department of Labor, Division of Occupational Safety and Health's position on Subarticle 6, Section 1910.120 (q)(6) of our Rules and Regulations, regarding the quality of training for first responder at the awareness level and the operations level.

Background.

There has been confusion at the acceptability that must be afforded to employees engaged in emergency response to hazardous substance releases at the first responder awareness level and the first responder operations level. The South Carolina Fire Academy has developed a 16-hour course, which has been delivered state-wide for approximately the last 18 months to all types of emergency responders. The course requires a written test with a 70 percent minimum score to successfully complete. All instructors must first complete the course as a student, then attend an Orientation Workshop on the course to be certified to teach it.

Interpretation

The 16-hour "Hazardous Materials First Responder Course" offered by the South Carolina Fire Academy is acceptable to the South Carolina Department of Labor, Division of Occupational Safety and Health as meeting the requirements under Section 1910.120(q)(6) for employees training at the first responder awareness level and the first responder operations level. Also, those employees who have taken this training and then attend the Orientation Workshop on the course shall be deemed certified instructors if:
      1. they have available written certification of such training; and
      2.   when conducting training, they use the same material used by the South Carolina Fire Academy or equivalent training materials approved by the South Carolina Fire Academy.

Effective Date

This memorandum is effective upon receipt and will remain in effect until cancelled or superseded.