

APPENDIX D
29 CFR 1910.120/29 CFR 1926.65 (HAZWOPER)
Training and Medical Surveillance Exemption Criteria

D-1. Employee training and medical surveillance requirements in OSHA's HAZWOPER standard do not have to be applied to cleanup tasks that will not expose employees to contaminant-related hazards. For the purposes of this ER, this means:

a. Cleanup tasks where the task or operation creates a barrier eliminating employee exposure to contaminant-related hazards.

b. Cleanup tasks that can be managed, without the use of engineering controls or PPE, so that employees will not be exposed to contaminant-related hazards.

D-2. All decisions to exempt HAZWOPER training and medical surveillance requirements from cleanup tasks shall be made by qualified SOH staff and shall be justified in the Health and Safety Design Analysis and specified in project specifications (fixed price contracts) or the project work plans (cost reimbursable contracts).