



# Oregon

Theodore R. Kulongoski, Governor

## Department of Consumer and Business Services

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November 23, 1990

Revised September 1, 2009

Fred Rodd  
Hazardous Materials Coordinator  
Boring Fire Dept Box 85  
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Re: Rule Interpretation OAR 437-02-1910.120

This is a requested interpretation of the Hazardous Waste Regulations OAR 437-002-1910.120, regarding the training level for a Fire Department Employee who enters a hazardous waste spill area, using level "B Personal Protection," for identification of the substance(s) because of unreadable or missing container labels, and the manifest not available for some reason. The employee does not participate in further action in the spill.

Since the employee is in defensive and not an offensive mode, the employee is in the "Operations Awareness Level," and is required to receive that level of training or experience. This level requires at least eight hours of training or sufficient experience to objectively demonstrate competency in several areas of hazardous materials and risk assessment. The level of personal protection does not define the "Awareness Level" of training required. If the employee continues in corrective action or in an offensive mode, stopping the release, then the "Materials Technician" level of training is required. The important issues are that employees are trained in the hazards present and are trained and know how to use the required Personal Protective Equipment (PPE). Training and competencies required will be on an individual case by case basis.

If you have any questions, regarding this interpretation, please feel free to contact this office.

Sincerely,

Peggy Munsell, Manager  
Standards & Technical Resources Section  
Oregon Occupational Safety & Health Division