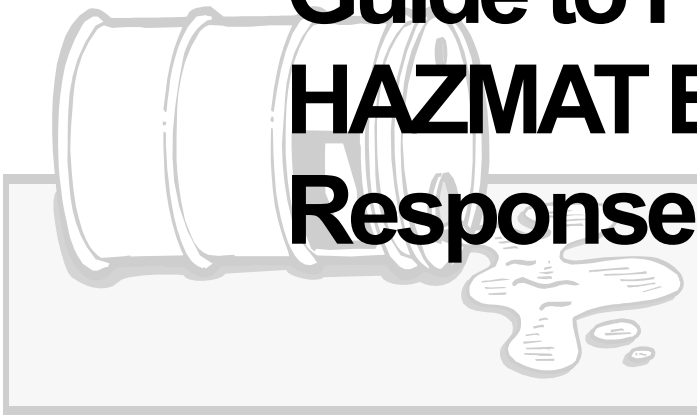




A Defense Industry Guide to Procuring HAZMAT Emergency Response Training



*How to procure the appropriate HAZMAT
Emergency Response training for your military
and DoD civilian personnel*



.....

Procuring HAZMAT Emergency Response Training

Choosing The Right Training For Your Organization's Needs

When seeking training to meet federal, DOD, or installation-specific requirements for those whom are identified in installation emergency response planning (IRP), it is important to ensure that the course objectives meet those of the regulatory requirements.

Hazardous Materials Emergency Response Training

Under DOD Instruction 6050.5 and the corresponding Occupational Safety and Health Administration's (OSHA) Hazardous Waste Operations and Emergency Response standard (HAZWOPER) 29 CFR 1910.120(q), those who have been assigned duties involving response to hazardous materials incidents must be trained to the competency appropriate to their role.

It is critical that you distinguish between emergency response activities and "post-emergency response operations." According to regulation, those who respond to HAZMAT emergencies must receive a different compliment of training than those who clean up afterward.

OSHA's HAZWOPER standard, as well as, The National Fire Protection Association's (NFPA) Recommended Practices 471 & 472 have standardized a tiered approach to emergency responder competencies that is based on the responder's role in your installation's emergency response plan.

I. First Responder Awareness Level - 29 CFR 1910.120(q)(6)(i)

First responders at the awareness level are those persons who can be the first on the scene of an emergency involving hazardous materials. First responders at the awareness level are expected to recognize the presence of hazardous materials, protect themselves, call for trained personnel, and secure the area.

II. First Responder Operations Level - 29 CFR 1910.120(q)(6)(ii)

First responders at the operational level are those persons who respond to releases or potential releases of hazardous materials for the purpose of protecting nearby persons, the environment, or property from the effects of the release. They are trained to respond in a defensive fashion to control the release from a safe distance and keep it from spreading.

It is important to note that DOD Fire Fighters should attend hazardous materials emergency response training that is designed to prepare them for the CerTest (administered through the DOD Fire Fighter Certification Program.)

III. Hazardous Materials Technician Level - 29 CFR 1910.120(q)(6)(iii)

Hazardous materials technicians are those persons who respond to releases or potential releases of hazardous materials for the purpose of controlling the release. Hazardous materials technicians are expected to use specialized chemical protective equipment and specialized instrumentation.

Competency	OSHA	EPA	DOD-IFSAC*
First Responder Awareness Level	No minimum	---	12 hours
First Responder Operations Level	8 hours	---	40 hours
Hazardous Materials Technician	24 hours	40 hours	80 hours
On-scene Incident Commander	24 hours	---	24 hours
Post Emergency Response Operations	40 hours	40 hours	---

Table. Minimum Requirements For Emergency Response Training.

IV. Hazardous Materials Specialist Level - 29 CFR 1910.120(q)(6)(iv)

Hazardous materials specialists have a similar role to the hazardous materials technician except that specialized knowledge of the installation response plan, personal protective equipment, and instrumentation is expected.

V. On-Scene Incident Commander - 29 CFR 1910.120(q)(6)(v)

The incident commander is responsible for all decisions relating to the management of the incident. The incident commander is identified in the installation response plan and is in charge of the incident site. 24 hours of instruction on: emergency response planning; the incident command system; and regulatory compliance is required. The *On-Scene Incident Commander Course* is designed to comply with the regulatory requirements, as well as function within your installation planning.

Choosing The Right Training Provider

As important as choosing the right curriculum, you must ensure that those providing the training are qualified to do so. There are few regulatory obstacles preventing unqualified companies and individuals from promoting compliance training in the marketplace. It is up to the employer to ensure that their personnel are receiving training from qualified instructors.

Approving/Certifying Organizations

US EPA Approval

For some curricula an organization can seek approval under The US Environmental Protection Agency's External Provider Program. A list of EPA Approved Providers is available from EPA Environmental Response Team.

IFSAC Approval

The International Fire Service Accreditation Congress (IFSAC) has accredited the DoD Fire Fighter Certification System. An integral part of the system's hazardous materials program is a series of challenge tests that certify DoD personnel to a specific level of competency. Because these tests are clearly the most challenging in the industry, it is critical that the students are adequately prepared by attending training designed specifically to this standard.

Purchasing Training

Laws and regulations governing the purchase of training

- The Government Employees Training Act (GETA),
- The Federal Acquisition Regulation (FAR), and
- The Defense FAR Supplements (DFARS).

Commanders, supervisors and other management officials who have been designated in writing to exercise delegated authority to approve training may use several methods to purchase training.

DD Form 1556

As a general rule, the process of requesting, selecting, approving, and purchasing training valued up to and including \$25,000 as a single purchase is exempt from formal contracting and acquisition procedures if it meets the definitions of “commercial” and “off-the-shelf” (5 USC 4105). The DD Form 1556 (Request, Authorization, Agreement, Certification of Training and Reimbursement) remains the authorized and required source document to purchase training not subject to contracting procedures.

Commercial Training Items:

Training courses, software, products, training conferences or instructional services customarily used for non-governmental purposes. The items are available to the general public and the Federal Government simultaneously, subject to similar terms and conditions.

Off-The-Shelf:

Course, program, or routine of instruction that presently exists and is available at commercial marketplace prices. Providers advertise standard features and costs of the item or service through established catalogs, schedules, or other public information sources. An item requiring minor modifications(s) resulting in no additional costs to the Government beyond the established, published prices, may still satisfy the criteria for designation as off-the-shelf.

(see 48 CFR 2.101)

Because private sector, as well as Government, organizations must comply with hazardous waste regulations, this training is available in the general marketplace and meets both “commercial training” and “off-the-shelf” definitions.

Vendors and training providers may include Government and non-Government sources. The non-Government sources include: business, commercial, or industrial firm; non-profit organizations; as well as universities, technical business, and vocational schools.

Training Projects over \$25,000

When an agency training course or program requires new design and development or the training is valued above \$25,000 for a single purchase, the purchase is subject to the

Defense Financial Management Regulation (DFMR), the FAR, DFARS, and local acquisition and contracting procedures.

Our consultants would be happy to discuss your training requirements, and the best options available to you. Please call us at (888) 408-0700, or visit us at our website www.gbpartnership.com.