OSHA’s Requirement for HAZMAT Hands-On Training

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Recently, I was asked a question in my class concerning HAZMAT computer-based training. Due to our current situation involving Sheltering in Place, the question seems eerily relevant.

The question was, “Are you going to start computer-based HAZMAT refresher training?” My response was that we would not be implementing a computer-based class. I followed up citing information from a letter I received from OSHA that frowned upon substituting a solely computer-based class.

Copied below is an excerpt from that letter issued by OSHA on August 16th, 2004:

August 16, 2004
Question: Is it possible to satisfy the requirements for 40 hours of classroom training solely through an on-line course, or would there need to be a supplemental portion of the training reserved for hands-on training in the use of personal protective equipment (PPE) and work practices by which an employer can minimize risks from hazards?

Answer: In OSHA’s view, self-paced, interactive, computer-based training can serve as a valuable training tool in the context of an overall HAZWOPER training program. However, use of computer-based training by itself, would not be sufficient to meet the intent of the standard’s various training requirements.

Safety and health training may often involve the presentation of technical material to audiences who typically have not had formal education in technical or scientific disciplines, such as in areas of chemistry or physiology. In an effective training program, it is critical that trainees have the opportunity to ask questions where material is unfamiliar to them.

For HAZWOPER training, equally important is the use of hands-on experience and exercises to provide trainees with an opportunity to become familiar with equipment and safe practices in a non-hazardous setting. Many industrial operations, particularly hazardous waste operations, involve complex hazardous tasks and exposures. Traditional hands-on training ensures that workers are prepared to safely perform their job assignments. The purpose of hands-on training (i.e., in the donning and doffing of PPE) is two-fold: first, to ensure that workers have an opportunity to learn by practical experience and second, to assess whether workers have mastered the necessary skills. It is unlikely that sole reliance on a computer-based training program will accomplish these objectives.

In summary, OSHA believes that computer-based training programs can be useful as part of an effective safety and health training program to satisfy OSHA training requirements, provided the program is supplemented by the opportunity for trainees to ask questions of a qualified trainer, and gives trainees hands-on familiarity with personal protective equipment.

Although this letter is an older letter, the intent remains clear and is still relevant today. You must have an opportunity to ask job specific questions involving your plant or facility of the instructor, and you need hands-on training to ensure your employees are competent in the event of an emergency. Complete computer-based training will not satisfy these requirements.
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