

**Table 4. HAZWOPER and Other Oil Spill Training Requirements in Federal Regulations**

Description of Training	HAZWOPER Requirements	Other Training Requirements
<b>USCG Facility Response Plan (FRP)</b>		
<p>USCG FRP regulations require a facility owner or operator (plan holders) to ensure that response workers are trained to perform their responsibilities under the plan in alignment with 33 CFR 154.1050 (Training, under FRPs for oil facilities).</p> <p>Plan holders also must ensure OSROs identified in their response plan provide this required worker training.</p> <p>The USCG's OSRO Classification Program requires OSROs to ensure similar worker training.</p>	<p>Under USCG FRP regulations (33 CFR 154.1050(d)), for <b>oil-handling facilities</b>, the plan holder must ensure workers are trained to meet OSHA's HAZWOPER standard (29 CFR 1910.120).</p> <p>Also under USCG FRP regulations (33 CFR 154.1050(a)), a facility owner or operator must identify the method to be used for training any volunteers or casual laborers used during a response to comply with OSHA's HAZWOPER standard.</p>	<p>Plan holders or OSROs should identify the skills necessary in a response and ensure that workers receive the proper training to perform those job responsibilities. Training records and descriptions of methods used for training workers must be available for USCG review.</p> <p>The USCG may verify HAZWOPER compliance and may ensure a plan holder's or an OSRO's records accurately document that all response workers identified in a response plan are satisfactorily trained according to HAZWOPER and any other job-specific requirements (33 CFR 154.1050(b) and (c)).</p> <p>The USCG FRP regulations (33 CFR 154.1055) require plan holders to conduct annual equipment deployment exercises and involve the OSROs in their response plans.</p>
<b>USCG Vessel Response Plan (VRP)</b>		
<p>USCG VRP regulations require plan holders to ensure that response workers are trained to perform their responsibilities under the plan in alignment with:</p> <ul style="list-style-type: none"> <li>• 33 CFR 155.1055 (Training under VRPs for <b>tank vessels</b> for oil), and</li> <li>• 33 CFR 155.5055 (Training under VRPs for <b>non-tank vessels</b>).</li> </ul> <p>Plan holders also must ensure OSROs identified in their response plan provide this required worker training.</p> <p>The USCG's OSRO Classification Program requires OSROs to ensure similar worker training.</p>	<p>For <b>tank vessels</b>, the training must differentiate between vessel workers and shore-based workers (33 CFR 155.1055(a)). The plan holder must ensure <b>shore-based workers</b> (33 CFR 155.1055(e)) are trained to meet OSHA's HAZWOPER standard. The training plan for <b>tank vessel workers</b> under a VRP can be developed according to Appendix C to 33 CFR 155, "Training Elements for Oil Spill Response Plans," which includes OSHA's HAZWOPER standard.</p> <p>For the <b>larger non-tank vessels*</b> (33 CFR 155.5055(a)), the plan holder must comply with the tank vessel training requirements under 33 CFR 155.1055 (which includes ensuring that <b>shore-based workers</b> are trained to meet OSHA's HAZWOPER standard). The training plan for <b>non-tank vessel workers</b> under a VRP can be developed according to Appendix C to 33 CFR 155, "Training Elements for Oil Spill Response Plans," which includes OSHA's HAZWOPER standard.</p>	<p>For the <b>smaller non-tank vessels**</b> (33 CFR 155.5055(b)), the plan holder must comply with the training requirements for the larger non-tank vessels, or with the Alternative Training and Exercise Program requirements (33 CFR 155.5061).</p> <p>The USCG may verify HAZWOPER compliance and may ensure a plan holder's or an OSRO's records accurately document that all response workers identified in a response plan are satisfactorily trained according to HAZWOPER and any other job-specific requirements (33 CFR 155.1055(b), (c) and (d)).</p> <p>The USCG VRP regulations require plan holders to conduct annual equipment deployment exercises and involve the OSROs in their response plans:</p> <ul style="list-style-type: none"> <li>• 33 CFR 155.1060 (<b>tank vessels</b>), and</li> <li>• 33 CFR 155.5060 (<b>non-tank vessels</b>).</li> </ul>
<b>EPA Facility Response Plan (FRP)</b>		
<p>EPA FRP regulations require that the owner or operator of a facility required to develop an FRP must develop a facility response training program to train workers involved in oil spill response activities (40 CFR 112.21).</p>	<p>The facility response training program should include procedures to respond to oil discharges and instruction on applicable oil spill response laws, rules, and regulations (40 CFR 112.21(b)(1)), such as the NCP and HAZWOPER.</p>	<p>The FRP must provide a description of the facility response training program and drill/exercise program that will be implemented under the response plan (40 CFR 112.20(h)(8)(ii) and (iii)).</p>
<b>PHMSA Oil Spill Facility Response Plan</b>		
<p>PHMSA regulations for onshore oil pipelines require operators to provide worker training (49 CFR 194.117). Training must include procedures to control any accidental discharge of oil and to minimize potential for fire, explosion, toxicity, or environmental damage; and proper firefighting procedures and use of response equipment and PPE (49 CFR 194.117(a)).</p>	<p>Under PHMSA regulations (49 CFR 194.117(c)), operators are responsible for ensuring that all workers are trained to meet OSHA's HAZWOPER standard for emergency response operations.</p>	<p>Training records must be maintained as long as workers are assigned duties under the response plan (49 CFR 194.117(b)).</p> <p>PHMSA regulations also require that response plans include a drill program (49 CFR 194.107(c)(1)(ix)).</p>
<b>BSEE Oil Spill Response Plan (OSRP)</b>		
<p>BSEE regulations for OSRPs for facilities located on the Outer Continental Shelf apply to offshore facility owners and operators of oil handling, storage, or transportation facilities (including offshore oil pipelines).</p>	<p>Workers in spill response management teams must receive training on their responsibilities under the OSRP (30 CFR 254.41(b)).</p> <p>An OSRP must be consistent with the NCP and the appropriate ACPs (30 CFR 254.5(b)). Per 40 CFR 300.150, response actions conducted under the</p>	<p>Offshore facility owners and operators must have all training certificates and records for oil spill response workers available for BSEE inspection (30 CFR 254.41(d)).</p>

Workers in spill response operations teams must receive annual hands-on training on deployment and operation of response equipment (30 CFR 254.41(a)).	NCP (40 CFR 300) must comply with OSHA's HAZWOPER standard, including training requirements.	BSEE regulations also require exercises for response workers and equipment in an OSRP, including OSROs (30 CFR 254.42).
* Non-tank vessels with an oil capacity of 250 barrels or greater (33 CFR 155.5055). ** Non-tank vessels with an oil capacity of less than 250 barrels (33 CFR 155.5055).		