



Oregon

Theodore R. Kulongoski, Governor

Department of Consumer and Business Services

Oregon Occupational Safety & Health Division (OR-OSHA)

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Chris O’Kief, Director
Industrial Training Center
Treasure Valley Community College
650 College Blvd
Ontario, OR. 97914

Dear Mr. O’Kief:

This is in response to the questions in your letter of May 20, 1999. You ask for clarification of qualifications for trainers under the 1910.120 Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) and the 1910.146 Permit Required Confined Space Standard. Specifically you ask about qualifications for the instructors conducting “train the trainer” training.

HAZWOPER: The HAZWOPER standard paragraph (q)(7) requires trainers who teach any of the HAZWOPER training subjects to have satisfactorily completed a training course for teaching the subjects they are expected to teach. Courses that would meet this requirement are classes similar to the course offered by the U.S. National Fire Academy. Instructors could also train if they have the training and/or academic credentials and instructional experience necessary to demonstrate competent instructional skills and a good command of the subject matter of the courses they are to teach. Appendix E of the HAZWOPER standard is a non-mandatory appendix that outlines the requirements for the instructor and the training program.

Confined Space: The 1910.146 Permit Required Confined Space standard paragraph (g)(4) requires the employer to certify that employees are trained. The qualifications of the instructor are not specifically addressed in the standard. The instructor should have adequate training skills and knowledge of the subject matter to ensure that all aspects of confined space entry are covered.

For further information or if you require further assistance contact OR-OSHA’s Technical Section at 503- 378-3272. You are also invited to see the OR-OSHA pages on the Internet at <http://www.cbs.state.or.us/external/osha/index.html>.

Sincerely,

Marilyn K. Schuster, Manager
Standards & Technical Resources Section
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