

U.S. Department of Labor

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Assistant Secretary for
Occupational Safety and Health
Washington, D.C. 20210



Richard Chinn, MS, CET
President
Richard Chinn Environmental Training, Inc.
P.O. Box 10776
Pompano Beach, FL 33061-6776

Dear Mr. Chinn:

This is a response to your March 24, 1999 letter about web-based training to satisfy the requirements of the Hazardous Waste Operations and Emergency Response (HAZWOPER) standard, 29 CFR 1910.120. You requested that OSHA confirm whether the web-based HAZWOPER refresher training your company provides meets the intent of the HAZWOPER standard with regard to hands-on training and trainer accessibility. Your description of the training and our response are below. We would like to apologize for the delay in responding to your letter.

"Our company offers web-based training to satisfy the requirements of the Hazardous Waste Operations and Emergency Response Annual Refresher Training (29 CFR 1910.120(e)(8)). We offer a program from our web page whereby participants work through a series of pages and have to answer questions at the end of each section. If the participant receives less than a 70% score, he/she must repeat that section. We also require the following hands-on skills be demonstrated by the participant video-taping proper demonstration of:

- 1. Cleaning a respirator*
- 2. Donning a respirator (including initial fit-testing)*
- 3. Doffing a respirator*
- 4. Donning the highest level suit the person would reasonably expect to wear*
- 5. Air sampling with the equipment the participant would reasonably be expected to operate.*

In addition, participants call our toll-free hotline or email us for answers. A Certified Environmental Trainer is available at designated times.

It is our interpretation that our program satisfies OSHA's requirements for hands-on training and for having a trainer availability [sic]."

Response: We appreciate your interest in attempting to meet the intent of OSHA requirements. The issues of hands-on training and trainer availability are particularly important when employers choose to use a computer-based training (CBT) approach for health and safety training. Your emphasis on these two topics suggests that you are familiar with prior OSHA interpretations on this subject. For your reference, the two letters on our website that discuss CBT for HAZWOPER in some detail are the 11/22/94 letter to Jackie Ward and the 11/11/94 letter to Gerald Joy.