

OLTrain

Friday, April 21, 2000

Charles N. Jeffress
Assistant Secretary for Occupational Safety & Health
US Department of Labor
Occupational Safety & Health Administration

Dear Assistant Secretary Jeffress:

We thank you for your review of our program. Your critique allows us to improve our program to not only expand worker health and safety protection but also to ensure compliance with the interpretations and intents of the Hazardous Waste Operations and Emergency Response training requirements. We wish to provide clarification on the issue of hands-on training and verification of hands-on skills that you raised during your review of our **Online HAZWOPER Refresher Training**.

When a person registers for the refresher training, he/she indicates the personal and respiratory protective equipment he/she wears or uses in his/her workplace. The hands-on training and verification of hands-on skills we require is based on the registration form. Hands-on skills training, when needed and appropriate, is provided via a series of still photos or video, as appropriate. Verification of hands-on skills currently must be provided by the registrant being videotaped performing the selected skills (as bandwidth increases in the near future, we will be able to provide hands-on training and skills verification live effectively and conveniently). We have ended the fixed list of hands-on training skills and verifiable hands-on skills provided in our first letter; we now assess hands-on skills training and verification of hands-on skills on a case-by-case basis. If a registrant's job duties require extensive hands-on skills that are not readily verifiable remotely, the person is referred to in-class refresher training.

I believe hands-on skills training and verification of hands-on skills were the only concerns you had with our program. Again, thank you for your review of our program.

Sincerely,



Richard Chinn, CET
President