



VOSH PROGRAM DIRECTIVE:02-421 (e-version) **ISSUED: August 20, 1986**

SUBJECT: Technical Assistance and Guidelines for Superfund and
 Other Hazardous Waste Site Activities

A. Purpose:

This directive transmits OSHA Instruction CPL 2-2.37A which provides guidelines for compliance personnel in conducting enforcement activities or providing technical assistance at hazardous waste sites. This directive makes two substantive changes in the guidelines set forth in CPL 2-2.37A.

B. Scope:

This directive applies VOSH-wide and specifically to Occupational Health Compliance personnel.

C. Action:

Directors and Managers shall ensure that the guidelines established in CPL 2-2.37A are adhered to during hazardous waste site activities, with two exceptions.

1. Substantive Change in paragraph J.4.b. of CPL 2-2.37A:

VOSH CSHO must be equipped to enter areas requiring levels C and D protection only. CSHO will not be assigned to conduct inspections in areas requiring levels A or B protection.

2. Substantive Change in paragraph J.4.c. of CPL 2-2.37A:

VOSH will only make equipment available for CSHO conducting hazardous waste site inspections required by levels C and D protection. VOSH will not provide equipment required by levels A and B protection.

[NOTE: It is VOSH's policy to assume at all hazardous waste sites that maximum

protection is required and the CSHO will provide any technical assistance or conduct an inspection in accordance with this policy. Any sampling for potential exposure will be conducted by attaching pumps to personnel from the controlling agency that are wearing maximum protection.]

D. Cancellation

Not Applicable

E. Action

Directors and Managers shall ensure that the policies and procedures explained in this directive are followed and that compliance officers are familiar with the contents of the standard.

F. Effective Date

August 20, 1986

G. Background

VOSH notified Federal OSHA on March 31, 1986 that it would evaluate the requirements of CPL 2-2.37A and inform Federal OSHA of action to be taken at a later date. This directive implements all of CPL 2-2.37A with the exception that VOSH personnel will not participate in hazardous waste site activities where levels A and B protection are required, nor will VOSH provide equipment required by those levels. VOSH staff have evaluated the guidelines in CPL 2-2.37A and determined that exposing VOSH personnel to the potentially extreme hazards that can be encountered when either levels A or B protection are required is a risk that is unnecessary and unproductive in Virginia.

1. In Virginia, VOSH will not be the agency in control of the type of sites in question. The controlling agency could be any of a number including EPA, the Department of Emergency Services and the Division of Solid and Hazardous Waste.
2. It is VOSH's policy to assume at all hazardous waste sites that maximum protection is required and to

provide any technical assistance or conduct any inspection in accordance with this policy. Any sampling for potential exposure can be conducted by attaching pumps to personnel from the controlling agency that are wearing maximum protection.

non e-Attachment: OSHA Instruction CPL 2-2.37A, Technical Assistance and Guidelines for Superfund and Other Hazardous Waste Site Activities
(Hard copy available upon request)

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