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Hazardous Materials and Terrorist Incident Prevention Curriculum Guidelines

Inspection and Enforcement

Introduction

Inspection and Enforcement describes the training needs of persons who monitor, inspect, and enforce safety compliance in operations that produce, use, store, or transport hazardous materials. In this role, audience members 1) identify hazardous materials risks and prevention opportunities associated with specific facility and transportation operations, and 2) assess and enforce compliance with established prevention authorities and codes.

The specific job requirements of *Inspection and Enforcement* personnel will vary depending on the size and nature of operations involved, the prevention strategy of the organization, assigned responsibilities, among other factors. However, a generic list of job responsibilities would include the following:

- Assess the adequacy of hazardous material prevention plans and programs prepared by facilities and transport companies.
- Assess the adequacy of safety systems and response capabilities in facilities and transport companies.
- Ensure that equipment is properly installed and maintained.
- Ensure that operating procedures are safe and effectively implemented.
- Ensure that operations and maintenance personnel are adequately trained.
- Brief community and facility officials of safety deficiencies and opportunities, and promote cooperation and coordination among decision makers.
- Monitor efforts to resolve problems, and implement policies and procedures designed to enforce compliance with applicable authorities and codes.
- Participate in safety reviews, compliance audits, incident investigations, and other types of prevention activities.

Training Audience

The training audience for *Inspection and Enforcement* includes inspectors and officials from community agencies (e.g., fire service, police, health agency, etc.) that are responsible for prevention, enforcement, and compliance programs and activities in the jurisdiction. Included are representatives of agencies that develop and enforce codes in all related areas (buildings, transportation, employee safety, fire, health, etc.).

The training audience also includes inspectors and enforcement personnel from public, private, and non-profit facilities that store, handle, transport, or use hazardous materials. In business and industry, the role may be filled by prevention program managers, safety officers, production managers, shift supervisors, or others assigned the responsibility. Representatives of insurance companies, consultants, safety experts, and others also perform the function in certain situations.

Training Requirements

Students are assumed to possess basic knowledge and skills in inspection and enforcement as a prerequisite of training. Therefore, the primary goal of training is to promote hazardous materials

prevention and safety by enhancing the participant's ability and motivation to 1) identify safety deficiencies and opportunities associated with the hazardous materials operations, 2) assess compliance with applicable prevention authorities and codes, and 3) monitor and enforce compliance according to established policies and protocols.

Inspection and Enforcement is a technical and complex process, potentially involving the application of a broad range of prevention authorities and codes to many different types of hazardous materials operations. All students will benefit from basic training in hazardous materials prevention and related authorities and codes. Training managers and course developers are encouraged to limit the scope of more advanced instruction to the extent possible by grouping students according to their job requirements and then focusing training accordingly. More advanced technical training can be classified into five categories:

- General: the ability to apply the broad range of hazardous materials authorities and codes to any facility/process or operations.
- Project-specific: the ability to identify and apply only those prevention requirements that are relevant to a specific facility/process or operations.
- Operations-specific: the ability to apply the broad range of hazardous materials authorities and codes to a certain type of facility/process or operations (e.g., refineries, retail outlets).
- Code-specific: the ability to apply a specific prevention code (fire, building, health, etc.) to any facility/process or operations.
- Process- and code-specific: the ability to apply a specific prevention code to a certain type of facility/process or operations.

However training is targeted, participants will benefit by generic instruction in hazardous materials prevention and an understanding of the organization's prevention, inspection, and enforcement programs. Course content should then emphasize the knowledge and skills students need to apply established authorities, systems, and procedures in representative hazardous materials and transport operations.

Methodology Recommendations

As described above, training requirements for different audience members may vary significantly. Therefore, students should be grouped whenever possible by job categories that reflect their inspection and enforcement responsibilities. Training can then be more effectively tailored to the specialized needs of different employees.

Instructional methodologies should emphasize opportunities for students to interpret and practice applying prevention codes and program requirements to different types of operations and under different types of conditions. Participant activities should also address management and political considerations. Examples and realistic scenarios are appropriate for this purpose. Practice should highlight creative approaches and practical solutions to common problems.

The scope and duration of training will vary, depending on the nature and complexity of organizational inspection and enforcement procedures, hazardous materials operations, and related authorities and codes. Checklists, job aids, and other practical tools that can be used on site should be included in course materials whenever possible.

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Appendix A:
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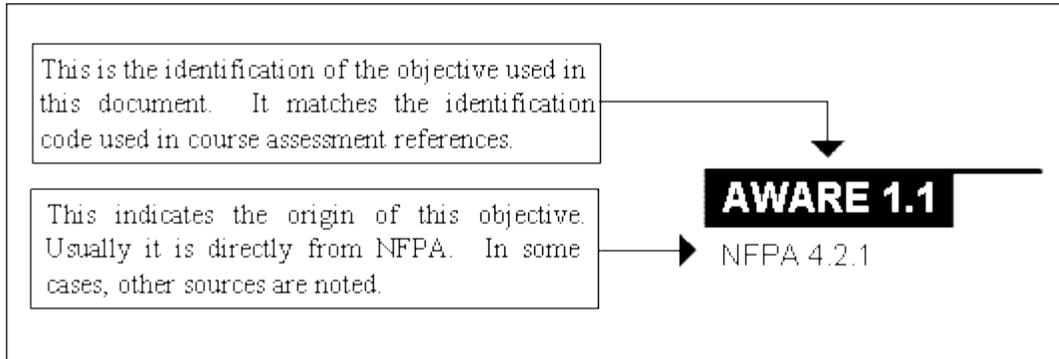
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Recommended Training Objectives

Objective Identification Legend



Inspection and Enforcement 1.

IN/ENF - 1.1.

Given an overview of prevention concepts and activities (see Prevention Awareness), describe aspects of the hazardous materials prevention system.

IN/ENF - 1.1.1.

Describe state and local laws, regulations, and policies that govern hazardous materials inspections and enforcement.

IN/ENF - 1.1.2.

Describe prevention strategies, activities, and roles specified in emergency operations and prevention plans.

IN/ENF - 1.1.3.

Describe strategies and plans for conducting hazardous materials inspections and enforcement activities.

IN/ENF - 1.1.4.

Describe administrative systems and roles for conducting hazardous materials inspections and enforcement activities.

IN/ENF - 1.2.

Given key prevention authorities and a range of representative inspection scenarios, identify hazardous materials safety deficiencies and opportunities.

IN/ENF - 1.2.1.	<p>Describe the purpose, structure, and content of key federal authorities governing the production, storage, handling, and transport of hazardous materials, including:</p> <ul style="list-style-type: none"> • OSHA’s General Safety and Health Provisions (29 CFR 1926.20) • OSHA’s Process Safety Management Standard (29 CFR 1910.119) • EPA’s Accidental Release Prevention Requirements (40 CFR Part 68) • OSHA’s Hazard Communication Standard (29 CFR 1910.1200) • DOT’s Hazardous Materials Regulations (49 CFR) • NRT’s Integrated Contingency Plan Guidance 	Prevention Training Considerations
IN/ENF - 1.2.2.	<p>Describe the purpose, structure, and content of state and local hazardous materials prevention ordinances, codes, and standards addressing:</p> <ul style="list-style-type: none"> • Buildings, construction, and fire prevention • Community planning, zoning, and occupancy • Employee safety and accident prevention • Health and environmental concerns 	Prevention Awareness
IN/ENF - 1.2.3.	<p>Demonstrate the ability to 1) research and apply prevention authorities and codes to representative hazardous materials operations and situations, and 2) identify related safety deficiencies and opportunities.</p>	Prevention Policy Development
IN/ENF - 1.3.	<p>Given prevention strategies and plans, conduct hazardous materials inspections and enforcement activities as assigned.</p>	Community Program Management
IN/ENF - 1.3.1.	<p>Demonstrate the ability to gather data, categorize risks, identify violations, and establish priorities among inspection requirements.</p>	Prevention in Operations
IN/ENF - 1.3.2.	<p>Demonstrate the ability to implement hazardous materials inspection procedures, addressing such factors as:</p> <ul style="list-style-type: none"> • Forms, checklists, questionnaires, etc. • Scheduling and planning inspections • Briefing facility managers, operating personnel, transporters, etc. • Gathering inspection data and identifying violations • Identifying safety deficiencies and concerns • Documenting and reporting results 	Design and Plans Review
IN/ENF - 1.3.3.	<p>Demonstrate the ability to implement enforcement procedures (consultation, violation notices, citations, personnel actions, audits, legal actions, etc.) designed to ensure compliance with inspection results.</p>	Inspection and Enforcement
		Appendix A: Haz Mat Prevention Authorities and Statutory Mandates
		Appendix B: Haz Mat Prevention Training Requirements
		Appendix C: Organizational Structure for Prevention
		Appendix D: OSHA Standard 1910.119