



Employee Training Requirements for Water and Sewer Departments

Many municipalities have asked the Department of Labor Standards what safety training is required. The following list summarizes the most frequent training requirements observed during DLS inspections at public sector workplaces.

This list is tailored for: Drinking Water and Sewer Departments

Training Topic ^{1,2,3,4}	Standard	Pre-Assignment ⁵	Refresher ⁶
Plant Operations			
SOPs and equipment	5(a)(1)	New hire	Performance based
Ladders - portable	1910.30(b)(1)	Yes	Performance based
Emergency Action Plan	1910.38(e)	New hire	Performance based
Hazard Communication	1910.1200(h)	New hire	Performance based
Personal Protective Equipment	1910.132 (d)(1)	New hire	Performance based
Fixed Ladders greater than 25 ft. high	1910.28 (b)(1)	Yes	Performance based
Portable ladders	1910.30 (b)(1)	Yes	Performance based
Respirators, if used	1910.134(k)	Yes	Annual
Plant Maintenance			
Fall Protection – when hatches or floor openings are opened.	1910.30(b)(1)	Yes	Performance based
Lockout Tagout	1910.147(c)(7)	Yes	Performance based
Confined Space Entry	1910.146(g)	Yes	Performance based
Overhead hoist, if present.	1910.179(b)(8)	Yes	Performance based
Distribution			
Workzone Safety – working in roadway	1926.21(b)(2)	Yes	Performance based
Trench safety - Laborers	1926.21(b)(2)	Yes	Performance based
Trench safety – Competent Person	1926.21(b)(2)	Yes	Performance based
Tools – grinders, power saws, jackhammer	1926.21(b)(2)	Yes	Performance based
Vactor – review Owner’s Manual	1926.21(b)(2)	Yes	Performance based
Confined Space Entry – manholes and tanks	1910.146(g)	Yes	Performance based
Asbestos Cement Pipe (8-hr)	454 CMR 6.00	Yes	5 year
Laboratory			
Laboratory – train on SOPs and equipment	5(a)(1)	Yes	Performance based
Landscaping			
Chainsaw – review Owner’s Manual and PPE	5(a)(1)	Yes	Performance based
Mowers – review Owner’s Manual	5(a)(1)	Yes	Performance based
Roof Access and Maintenance			
Fall Protection – designated areas and/or fall restraint system	1910.30(b)(4)	Yes	Performance based
Snow Removal			
Snow blower – review Owner’s Manual	5(a)(1)	Yes	Performance based

Optional Topics			
OSHA 10 in construction	Not required by OSHA standards. Recommended if your employees are on site of public construction projects >\$10,000.	Optional	Does not expire
Ergonomics – safe lifting	Recommended when your department has a pattern of back injuries.	Recommended	1-3 years, based on department injury patterns.

- 1- **Topics:** Employees should be trained to safely perform the activities of their job. Training on these topics is expected if employees conduct these tasks. If these tasks are not conducted at your workplace, then training is not required.
- 2- **Job Titles that Require Training:** Train employees in a particular competency if their job duties require that activity. For example, all employees who are assigned to operate a chainsaw must be trained in chainsaw safety. Employees who will not be designated to operate a chainsaw do not need to complete chainsaw training.
- 3- **Training Provider:** Training should be provided by persons experienced and confident with the material. The training provider can be an employee of the employer. A certified training provider is mandatory for Asbestos Cement Pipe and OSHA 10, but is not required for other OSHA topics.
- 4- **Length of Training Session:** Most training topics can be effectively covered in less than one hour (ie. hazard communication; PPE; ladders). A longer length of time may be required for chainsaw safety, aerial lift operator training, and confined space entry. A minimum time period for length of training session is specified for asbestos cement pipe (8-hours). The employer is responsible for the decision on length of training.
- 5- **Proof of Training:** Keep a training attendance log. A certificate is not required.
- 6- **Initial Training:** Training should be provided before the employee is assigned to perform the task. This is similar to “new hire” training, but can also occur if the person’s job duties expand.
- 7- **Performance Based Refresher Training:** Some OSHA standards mandate Annual training. Most training topics are “performance based.” This means repeat the training when:
 - a. Employer has reason to believe that there are deviations from or inadequacies in the employee’s knowledge to perform the task safely;
 - b. New equipment, or chemicals introduce new hazards to the work area.
 - c. There is a change in procedures that present a hazard to which the employee has not been trained.