CERCLA INCIDENT RESPONSE CONTINUUM*

Emergency Response Operations (29CFR 1910.120q)
- CG Training: 24 Hour FRA/FRO

Post-Emergency Response Operations (29 CFR 1910.120 b-o)
- EPA/External Training: 24-40+ Hour HAZWOPER
- No OSHA Training Required

Public Safety Agency: ER
- EPA & CG: Emergency Action Phase / Removal Action

EPA Only: Time Critical Removal Action; CG Vessels Only
- EPA/External Training: 40-80+ Hour HAZWOPER

Enforcement / Cost Recovery / Litigation
- Government/Agency Jurisdiction:
  - PRIMARY: Local/State
  - SECONDARY: Federal

Example Actions:
- Establishment of safety/security zones, evacuation, shelter in place orders, mass casualty/triage, firefighting operations

Example Actions:
- Berms, air monitoring, soil/water sampling, drum over-packing, segregation of chemicals, or to eliminate IMMEDIATE threat of release & media contamination

Example Actions:
- Continuous air monitoring & soil/water sampling, actions begin within 6 months and last less than 12 months. Full PA/SI required, part NPL site

Example Actions:
- Documentation review, search warrants, cost recovery proceedings, sworn testimony, trial preparation, and technical briefings.

OSHA Guidelines & CG/EPA Recommendations

*Based upon response authorities found in CERCLA §104(a) and the NCP 40 CFR §300.400.*