

Water & Wastewater Safety Training Requirements Checklist

Every OSHA, EPA and DOT training requirement that applies to water and wastewater service companies — organized by role, with citations and renewal intervals.

How to use this checklist

1. **Work role by role, not hazard by hazard.** Requirements attach to what a person actually does. Start with the roles you employ and ignore the sections that don't apply.
2. **Mark three states, not two.** "In place" means trained *and* documented. If you can't produce the record, it isn't in place.
3. **Check the frequency column carefully.** Several requirements have no fixed federal interval — they're triggered by events like a change in assignment, process, or equipment. Those are the ones programs quietly fall out of compliance on.
4. **Note what training alone can't satisfy.** See the panel on the last page.

Before you rely on this: intervals and applicability vary by operation, chemical inventory, vehicle class, and whether you're in a federal OSHA or State Plan jurisdiction. Confirm every item against current CFR text and your state plan. This is a planning tool, not legal or compliance advice.

1. All Employees

Baseline requirements that generally apply across your workforce

REQUIREMENT	CITATION	FREQUENCY	LAST DONE / NEXT DUE	STATUS
Hazard Communication	29 CFR 1910.1200(h)	At initial assignment; again whenever a new chemical hazard is introduced	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Emergency Action Plan & evacuation	29 CFR 1910.38	On assignment and when the plan changes	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Portable fire extinguisher use	29 CFR 1910.157(g)	On assignment, then annually, where employees are expected to use extinguishers	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Bloodborne pathogens	29 CFR 1910.1030(g)(2)	At assignment, then annually, for employees with occupational exposure	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
First aid / CPR awareness	29 CFR 1910.151	Required where no infirmary or clinic is in near proximity; certification cycles vary by provider	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Workplace violence & harassment prevention	State-specific	<i>Varies by state</i> — several states mandate a written plan, training, and an annual cycle	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Heat illness prevention	State-specific	<i>Varies by state</i> — confirm your jurisdiction's standard and trigger temperatures	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A

2. Field Service Technicians & Plant Operators

Crews working around tanks, basins, confined spaces, and treatment chemicals

REQUIREMENT	CITATION	FREQUENCY	LAST DONE / NEXT DUE	STATUS
Permit-required confined space — entrants, attendants, entry supervisors	29 CFR 1910.146(g)	Before first assignment; on change of duties; when hazards change; when deficiencies are observed. <i>No fixed federal interval — many employers set annual.</i>	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Atmospheric testing & monitoring	29 CFR 1910.146(c)(5), (d)(5)	Tied to confined space program; on assignment and equipment change	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Hydrogen sulfide (H₂S) & methane hazard awareness	1910.146 / 1910.1200	On assignment; refresh when process or site conditions change	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Respiratory protection	29 CFR 1910.134(k)	Annually. Medical evaluation and fit testing required before use; fit test at least annually	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Personal protective equipment	29 CFR 1910.132(f)	Before assignment; retrain when PPE, hazards, or demonstrated understanding change	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Chlorine gas safety & leak response	1910.1200 / 1910.38 / EPA RMP	On assignment; refresh with plan or inventory changes	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Chemical spill & release response	29 CFR 1910.120 (scope-dependent)	Depends on responder role; HAZWOPER-covered responders require annual refresher	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Process Safety Management	29 CFR 1910.119(g)	Initial, then refresher at least every 3 years , for covered processes above threshold quantities	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A

3. Maintenance & Mechanical Crews

Servicing pumps, valves, motors, and chemical systems

REQUIREMENT	CITATION	FREQUENCY	LAST DONE / NEXT DUE	STATUS
Lockout/Tagout — authorized & affected employees	29 CFR 1910.147(c)(6), (c)(7)	Initial; retrain on change of assignment, machines, or procedures. Annual periodic inspection of energy control procedures required	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Powered industrial truck (forklift) operator	29 CFR 1910.178(l)	Initial training and evaluation; re-evaluation at least every 3 years , plus after incidents or unsafe operation	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Fall protection	29 CFR 1910.30	Before exposure; retrain when equipment or hazards change or performance indicates a need	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Ladder safety	29 CFR 1910.23 / 30	Before use; retrain on change	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Machine guarding	29 CFR 1910.212	No explicit training mandate in the standard — covered through PPE, HazCom, and general duty obligations	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Electrical safety / arc flash awareness	29 CFR 1910.332	Before assignment for qualified and unqualified persons exposed to electrical hazards	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Excavation & trenching	29 CFR 1926 Subpart P	Competent person designation required; applies to construction-classified work	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A

4. Drivers & Chemical Delivery Crews

The requirements most often missed by water and wastewater companies

REQUIREMENT	CITATION	FREQUENCY	LAST DONE / NEXT DUE	STATUS
Hazmat employee training — general awareness, function-specific, safety, security awareness	49 CFR 172.704	Every 3 years. New hazmat employees may perform functions under direct supervision pending training, generally within 90 days	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
In-depth security awareness (if a security plan applies)	49 CFR 172.704(a)(5), 172.800–804	Required where a hazmat security plan is required; aligned to the 3-year cycle	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Driver qualification file & CDL currency	49 CFR 391	Ongoing; annual MVR review and certification of violations	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Controlled substances & alcohol testing program — driver awareness materials	49 CFR 382.601	Provide written policy materials to every driver; update on change	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Defensive driving	Best practice / insurer-driven	Not federally mandated; commonly annual and frequently required by insurers and customer contracts	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A

REQUIREMENT	CITATION	FREQUENCY	LAST DONE / NEXT DUE	STATUS
Distracted driving / mobile phone restrictions	49 CFR 392.80, 392.82	Policy required; training commonly annual	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Backing accident prevention	Best practice / insurer-driven	Commonly annual — the highest-frequency, lowest-severity claim category for service fleets	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Yard truck / non-CDL vehicle operation	29 CFR 1910.178 (where applicable)	On assignment; re-evaluate periodically	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Emergency signals & emergency equipment	49 CFR 392.22, 393.95	On assignment; part of driver orientation	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A

5. Supervisors & Safety Leads

Requirements that attach to the supervisor, not the crew

REQUIREMENT	CITATION	FREQUENCY	LAST DONE / NEXT DUE	STATUS
Reasonable suspicion — controlled substance use	49 CFR 382.603	At least 60 minutes , one time, for every supervisor who may make a reasonable-suspicion determination about a CDL driver	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Reasonable suspicion — alcohol misuse	49 CFR 382.603	At least 60 additional minutes , one time. This is a separate hour from the controlled-substance training	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Entry supervisor duties (confined space)	29 CFR 1910.146(g), (j)	Before assuming entry supervisor duties	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Competent person designations	Standard-specific	Documented by the employer per applicable standard (excavation, fall protection, scaffolding)	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Injury & illness recordkeeping	29 CFR 1904	Ongoing; annual summary posting Feb 1 – Apr 30; electronic submission where applicable	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Incident investigation	Program-driven	On assignment to the role; refreshed with program updates	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A

6. Environmental & Waste Handling

EPA-side obligations that safety-only training providers usually omit

REQUIREMENT	CITATION	FREQUENCY	LAST DONE / NEXT DUE	STATUS
RCRA hazardous waste personnel training	40 CFR 262.17(a) (7) LQG • 262.16 SQG	Annual training for LQG personnel; requirements scale with generator category. Permitted/interim-status facilities follow 40 CFR 264.16 / 265.16	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Stormwater / SWPPP implementation	EPA NPDES permit conditions	Set by your permit — typically annual for personnel implementing the plan	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Risk Management Program awareness	40 CFR 68	Applies to facilities holding regulated substances above threshold quantities; refresher cycle set by program	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Spill Prevention, Control & Countermeasure (SPCC)	40 CFR 112.7(f)	Annual discharge prevention briefing for oil-handling personnel, where SPCC applies	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Safe Drinking Water Act operational practices	SDWA / state primacy agency	Operator certification and continuing education set by your state agency	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A

7. Written Programs — training alone isn't compliance

Each item below is a document an inspector will ask to see, separate from training records

WRITTEN PROGRAM	CITATION	NOTE	LAST DONE / NEXT DUE	STATUS
Permit-required confined space program	29 CFR 1910.146(c)(4)	Written program plus permits, rescue arrangements, and a site-specific hazard assessment	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Energy control (LOTO) procedures	29 CFR 1910.147(c)(4)	Machine-specific written procedures, not a generic policy	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Hazard communication program	29 CFR 1910.1200(e)	Written program, chemical inventory, and accessible SDS library	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Respiratory protection program	29 CFR 1910.134(c)	Written program administered by a designated program administrator	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Emergency action plan	29 CFR 1910.38(b)	Written where required by employee count and hazards	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
DOT drug & alcohol testing program	49 CFR 382	Written policy, random testing pool, and Clearinghouse queries	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Hazmat security plan	49 CFR 172.800–804	Required for certain materials and quantities	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A
Hazmat training records	49 CFR 172.704(d)	Retained for the current cycle plus 90 days after employment ends	L: _____ N: _____	☐ In place ☐ Gap ☐ N/A

Tally your gaps

Requirements reviewed	50
Marked Gap	_____
Marked N/A (confirm each one really doesn't apply)	_____
Items with no date recorded	_____

Any number above zero in the gap column is a finding. Three or more inside a single role is usually a program problem rather than an oversight — the requirement was never assigned to anyone, as opposed to someone falling behind on it.

The five gaps we see most often

- Reasonable suspicion training for supervisors.** Water and wastewater companies rarely think of themselves as transportation operations, so the supervisors of CDL drivers go untrained. It's two separate hours, one time, and it's cheap to fix.
- Hazmat training treated as a one-time event.** The 49 CFR 172.704 cycle is every three years. Programs built around new-hire onboarding drift out of compliance in year four without anyone noticing.
- Training records that exist but can't be produced by entity.** Multi-company operators can often prove someone was trained, but not quickly, and not sorted by legal entity — which is exactly how an auditor asks.
- Event-triggered retraining that never triggers.** Most OSHA retraining obligations fire on a change in process, equipment, or assignment. Almost nobody has a mechanism connecting operational change to a training assignment.

5. The written program behind the training. Confined space and LOTO training without a site-specific written program and machine-specific procedures is a citation waiting to happen, however good the course was.

What online training can and can't satisfy

Online courses cover the knowledge and classroom components of these standards, and they generate the completion records that prove it. Some requirements have a hands-on element that no online course can satisfy, and any vendor telling you otherwise is selling you a compliance gap:

Requires in-person evaluation or a physical procedure: respirator fit testing and medical evaluation (1910.134) · powered industrial truck operator practical evaluation (1910.178(l)) · practical demonstration of confined space entry duties · machine-specific LOTO procedure verification · hands-on CPR skills assessment for certification-level first aid.

Also worth knowing: OSHA does not approve, certify, or accredit third-party training providers or courses outside its Outreach Training Program. What matters in an inspection is whether the training met the requirements of the standard and whether you can document it.

Found gaps?

Sentry Road covers OSHA, EPA and DOT training for the same workforce, in one platform, with one administrator — including the driver and hazmat requirements most water and wastewater training providers don't offer. Multi-company operators get roll-up and entity-level reporting, and new acquisitions onboard into your existing standard in days.

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Disclaimer. This checklist is a planning and self-assessment tool, not legal, regulatory, or compliance advice, and it is not a complete statement of any employer's obligations. Applicability and renewal intervals depend on your operations, chemical inventory, vehicle classes, generator category, permit conditions, and whether you operate under federal OSHA or an approved State Plan; State Plan requirements may be more stringent than the federal standards cited. Regulations change. Verify every item against current CFR text and your governing agencies before relying on it. © 2026 Sentry Road.