The best way to determine which occupational hazards exist at such a site is to conduct a job hazard analysis for each task. A job hazard analysis combines employee exposure information with equipment and procedural information and results in a list of chemical and physical hazards associated with each task. When the employer has identified the hazards that may be present and that could result in employee exposure, it can find the applicable OSHA standards designed to protect its employees.

Common hazards experienced during site assessment and cleanup work at Brownfield sites include:

- Chemical hazards from surface or subsurface soil contamination or from contaminants present in buildings or containers (e.g., drums, underground storage tanks, confined spaces)
- Heat stress hazards
- Fall hazards from elevated work surfaces
- Slip, cave-in, and fall hazards from trenches and excavations
- Noise hazards
- Electrical hazards
- Hazards from heavy equipment, handheld tools, and other construction or demolition-related activities.

**Applicable OSHA Standards**

All OSHA general industry and construction standards (29 CFR 1910 and 1926) may apply to work at Brownfield sites, depending on the type of work performed and the hazards to which employees may be exposed. (Requirements may differ in states with OSHA-approved State Plans).

1926.301), Fall Protection (29 CFR 1926 Subpart M), and Excavations (29 CFR 1926 Subpart P).

OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) standard (29 CFR 1910.120 and 1926.65) may apply if the work to be done includes:

• Cleanup operations required by a governmental body involving hazardous substances which are conducted at an uncontrolled hazardous waste site.
• Corrective actions involving cleanup operations at sites covered by the Resource Conservation and Recovery Act of 1976.
• Voluntary cleanup operations at sites recognized by a governmental body as an uncontrolled hazardous waste site.

Cleanup operations are defined in paragraph (a)(3) of the HAZWOPER standard to include operations where hazardous substances are removed, contained, stabilized or processed in order to make the site safer for people or the environment.

Please note that even if operations performed at a Brownfield site are not covered by the HAZWOPER standard, other federal and state government programs (e.g., a funding contract or a state voluntary clean up program) may require HAZWOPER compliance.

Contents of a Written Health and Safety Plan (HASP)
If OSHA’s HAZWOPER standard applies, the employer must prepare a site-specific HASP which addresses the safety and health hazards, control measures, and work tasks of each phase of site operation and includes requirements and procedures for employee protection. It must be kept on site while work is being conducted and revised as site personnel, conditions, and work tasks change.

A HASP includes site-specific information on the following:
• Site characterization and hazard analysis
• Site control measures
• Personal protective equipment for site tasks and operations
• Employee training
• Monitoring and sampling
• Medical surveillance
• Decontamination procedures
• Emergency response
• Spill containment
• Confined space entry (if applicable)

Employers whose operations are not covered by the HAZWOPER standard may still want to address site safety and health with a written HASP that records hazards, identifies applicable OSHA standards, and recommends appropriate exposure controls.

For further information on Brownfields, please visit OSHA’s Brownfields Safety and Health Topics page at http://www.osha.gov/SLTC/brownfields/index.html. Also visit the Environmental Protection Agency’s (EPA) Brownfields site at http://www.epa.gov/brownfields/index.html.