

# Step 9: Train Employees

## Personnel training for very small quantity generators of hazardous waste

Waste/Hazardous waste #1.09a • April 2010

### Environmental concerns

**E** Improper management of hazardous waste can increase business costs and could risk the health of you and your employees. **The most effective way to ensure proper hazardous waste management is to train employees.**

### Waste minimization

Well-trained employees can help minimize the amount and risks of the wastes your business must generate. Reducing the amount of hazardous waste generated can reduce both direct and indirect costs as well as help protect the environment.

### Hazardous waste requirements

Very small quantity generators of hazardous waste (VSQGs) are not required under the Minnesota Hazardous Waste Rules to train their employees. However, the Minnesota Pollution Control Agency (MPCA) strongly encourages all hazardous waste generators, including VSQGs, to train their employees in hazardous waste management and emergency response.

VSQGs may be required under other federal or state regulations, such as Occupational Safety and Health Administration (OSHA) and Department of Transportation (DOT) regulations, to train employees in actions that may relate to hazardous waste.

### OSHA requirements

Hazard Communication Standard Regulations (29 CFR 1910.1200) administered by the U.S. Occupational Safety & Health Administration (OSHA) do not apply directly to hazardous wastes. However, at almost all businesses they

require training employees working with many chemicals that may become hazardous wastes.

Hazard Communication Standard (HCS) Regulations are commonly confused with Hazardous Waste Operations and Emergency Response (HAZWOPER) Regulations found at 29 CFR 1910.120 and also administered by OSHA. HAZWOPER regulations require specific hazardous waste response training for:

- certain employees at hazardous waste remediation sites and permitted hazardous waste Treatment Storage and Disposal Facilities
- employees at any site, including a VSQG site, who are designated responders in a hazardous waste spill response plan

Employees of most VSQGs likely will not be required to be HAZWOPER-trained, *if* they are directed to:

- manage only minimal spills that occur in the course of normal work and that can be managed without triggering a spill response plan
- evacuate the facility in case of a hazardous waste incident.

### DOT requirements

Hazardous Materials Regulations (49 CFR 172.704) administered by the U.S. Department of Transportation require training under certain circumstances. A business that uses a hazardous waste manifest when shipping is required to train all employees involved in preparing the waste for shipment or handling shipping documents.

Because Minnesota hazardous waste rules require a generator to sign a hazardous waste manifest, all VSQGs who use hazardous waste manifests must train at least some of their employees under the Hazardous Materials Regulations.

## Recommendations

The MPCA strongly recommends that all hazardous waste generators, including VSQGs, train employees in emergency response procedures appropriate to their site. Thorough training an effective way to ensure proper hazardous waste management.

The MPCA also recommends training employees who directly handle hazardous waste or who operate processes that generate hazardous waste. Training should be appropriate to an employee's duties. For example:

- **Managing hazardous waste containers** – choosing proper containers, marking and labeling containers, proper container handling
- **Accumulating hazardous waste** – accumulation time limits, adequate aisle space, closing containers, separating incompatible wastes
- **Inspecting stored hazardous waste** – common storage errors, documenting inspections
- **Preparing hazardous waste for shipping** – DOT packaging, preparing, reviewing and submitting manifests

## Training resources

The MPCA offers:

- **Hazardous waste fact sheets** – can assist you in training employees  
To access the fact sheets and for more information on hazardous waste topics, see the MPCA's hazardous waste publications Web site:  
[www.pca.state.mn.us/waste/pubs/business.html](http://www.pca.state.mn.us/waste/pubs/business.html)  
Though not required, generators may document their employee training using the template in MPCA hazardous waste fact sheet #1.09d, *Record of Employee Hazardous Waste Management Training*, available at the above web site.
- **Hazardous waste training workshops** – offered periodically throughout Minnesota. To see the current schedule, see MPCA's training Web site:  
[www.pca.state.mn.us/news/training/index.html](http://www.pca.state.mn.us/news/training/index.html)

U. S. OSHA, MN OSHA, U.S. DOT, and MNDOT also have training materials and guidance available. To

access or request this information, visit their Web sites or call the contact numbers given below.

## More information

Address questions regarding Hazardous Communication Standard (HCS) or HAZWOPER regulations to OSHA or MN OSHA.

Address questions regarding Hazardous Materials Regulations (HMR) to U.S. DOT or MNDOT.

Address questions regarding hazardous waste training or requirements to your metropolitan county hazardous waste staff or your nearest MPCA regional hazardous waste staff.

## Metro County Hazardous Waste Offices

Anoka .....	763-422-7093
Carver .....	952-361-1800
Dakota .....	952-891-7557
Hennepin .....	612-348-3777
Ramsey .....	651-266-1199
Scott .....	952-496-8475
Washington .....	651-430-6655
Web sites .....	<a href="http://www.co.[county].mn.us">www.co.[county].mn.us</a>

## Minnesota Pollution Control Agency

Toll free (all offices) .....	1-800-657-3864
Brainerd .....	218-828-2492
Detroit Lakes .....	218-847-1519
Duluth .....	218-723-4660
Mankato .....	507-389-5977
Marshall .....	507-537-7146
Rochester .....	507-285-7343
St. Paul .....	651-296-6300
Willmar .....	320-214-3786
Web site .....	<a href="http://www.pca.state.mn.us">www.pca.state.mn.us</a>

## Minnesota OSHA

Toll free .....	1-800-DIAL-DLI
Web .....	<a href="http://www.doli.state.mn.us/MnOSHA.asp">www.doli.state.mn.us/MnOSHA.asp</a>

## U.S. OSHA

Toll free .....	1-800-321-OSHA
Web site .....	<a href="http://www.osha.gov">www.osha.gov</a>

## Minnesota Department of Transportation

Hazardous Materials .....	651- 215-6330
Web .....	<a href="http://www.dot.state.mn.us/cvo/hazmat.html">www.dot.state.mn.us/cvo/hazmat.html</a>

## U.S. Department of Transportation

Hazardous Materials .....	1-800-467-4922
Web site .....	<a href="http://www.phmsa.dot.gov/hazmat">www.phmsa.dot.gov/hazmat</a>