

Step 9: Train Employees

Personnel training for small quantity generators of hazardous waste

Waste/Hazardous Waste #1.09b • August 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 generates. Reducing the amount of hazardous waste generated can reduce both direct and indirect costs as well as help protect the environment.

Hazardous waste requirements

Small quantity generators of hazardous waste (SQGs) must train all employees having hazardous waste management or emergency response duties. Training must cover the skills and procedures relevant to their duties and must be completed within six months of the start of their hazardous waste-related duties. Document the training.

SQGs may also be required under other federal or state regulations to train employees in actions that may relate to hazardous waste and to document that training. Examples of other regulations are Occupational Safety and Health Administration (OSHA) and Department of Transportation (DOT) regulations.

MPCA requirements

While Minnesota Hazardous Waste Rules administered by the Minnesota Pollution Control Agency (MPCA) do not require

training for SQG employees beyond the mandatory and documented initial training, the MPCA encourages periodic refresher training as the best method to ensure all employees maintain proficiency in such skills. Periodic training is the most effective way to ensure proper hazardous waste management.

You may provide hazardous waste training using any method appropriate to your facility, including but not limited to:

- on-the-job or in-work-area training
- classroom instruction
- off-site seminars

Training must 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 waste** – common storage errors, documenting inspections
- **Preparing hazardous waste for shipping** – DOT packaging, preparing, reviewing and submitting manifests

OSHA requirements

Hazard Communication Standard (HCS) Regulations [29 CFR 1910.1200] administered by the U.S. 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.

HCS Regulations are commonly confused with the Hazardous Waste Operations and Emergency Response (HAZWOPER) Regulations [29 CFR 1910.120] 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 an SQG site, who are designated responders in a hazardous waste spill response plan

Employees of most SQGs 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 (HMR) [49 CFR 172.704] administered by the U.S. DOT 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 SQGs who use hazardous waste manifests must train at least some of their employees under the HMR.

Training resources

The MPCA offers:

- Hazardous waste fact sheets to assist you in training employees. To access fact sheets on hazardous waste topics, see the MPCA's hazardous waste publications at: www.pca.state.mn.us/waste/pubs/business.html SQGs may select any training documentation format that works best for their needs. Generators may document their employee training using the form *Hazardous Waste Management Training Record* (MPCA hazardous waste fact sheet #1.09d) at the Web site above.

- **Hazardous waste training workshops** offered periodically throughout Minnesota. To see the current MPCA schedule, see www.pca.state.mn.us/news/training/index.html Contact your metro county for its schedule.

More information

Address questions regarding HCS or HAZWOPER regulations to OSHA or MNOSHA.

Address questions regarding 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	www.co.[county].mn.us

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	www.pca.state.mn.us

Minnesota OSHA

Toll free	1-800-DIAL-DLI
Web	www.doli.state.mn.us/MnOSHA.asp

U.S. OSHA

Toll free	1-800-321-OSHA
Web site	www.osha.gov

Minnesota Department of Transportation

Hazardous Materials	651- 215-6330
Web	www.dot.state.mn.us/cvo/hazmat.html

U.S. Department of Transportation

Hazardous Materials	1-800-467-4922
Web site	www.phmsa.dot.gov/hazmat