

# Step 9: Train Employees

## Personnel training for large quantity generators of hazardous waste

Waste/Hazardous waste #1.09c • 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

Large quantity generators of hazardous waste (LQGs) must train all personnel at their site\* having hazardous waste management or emergency response duties. Training must cover the skills and procedures relevant to their job duties and be completed within six months of the start of their hazardous waste-related duties. No personnel with hazardous waste-related duties may work unsupervised until they complete their initial training. LQGs must also provide refresher training to these employees once per calendar year. Document all training.

**\*Note:** LQGs are responsible for ensuring and documenting the hazardous waste training of not only their own employees, but also that of any on-site contractors who may affect hazardous waste operations.

LQGs may also 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 and to document that training.

### MPCA requirements

A person trained in hazardous waste management procedures must direct an LQG training program. Before providing training, an LQG must:

- list each job title at its site related to hazardous waste management
- identify by name all employees assigned to each listed job title
- prepare a job description for each listed job title specifying the duties, requisite skills and qualifications for each job title
- prepare a hazardous waste training plan for each listed job title specifying the initial and annual training needed for each job title

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 a worker'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

The training program must also cover the relevant portions of the generator's Hazardous Waste Contingency Plan. For information on the requirement for LQGs to prepare a contingency plan, see Minnesota Pollution Control Agency (MPCA) hazardous waste fact sheet #1.08c, *Step 8: Plan for Emergencies; Emergency planning for large quantity generators*, at: [www.pca.state.mn.us/publications/w-hw1-08c.pdf](http://www.pca.state.mn.us/publications/w-hw1-08c.pdf).

## 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 LQG site, who are designated responders in a hazardous waste spill response plan

Most employees of an LQG 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 LQGs 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** that can 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](http://www.pca.state.mn.us/waste/pubs/business.html).

LQGs 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. For the current MPCA schedule, see [www.pca.state.mn.us/news/training/index.html](http://www.pca.state.mn.us/news/training/index.html). Contact your metro county to get 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 .....	<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..... [www.pca.state.mn.us](http://www.pca.state.mn.us)

## **Minnesota OSHA**

Toll free ..... 1-800-DIAL-DLI  
Web ..... [www.doli.state.mn.us/MnOSHA.asp](http://www.doli.state.mn.us/MnOSHA.asp)

## **U.S. OSHA**

Toll free ..... 1-800-321-OSHA  
Web site..... [www.osha.gov](http://www.osha.gov)

## **Minnesota Department of Transportation**

Hazardous Materials ..... 651- 215-6330  
Web ..... [www.dot.state.mn.us/cvo/hazmat.html](http://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](http://www.phmsa.dot.gov/hazmat)