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| Image of different types of household hazardous waste bottles, including oil, gas can, insect spray and others. | **SOP 1.04 Training Requirments: General Information for**  **HHW Programs** |

# 1. Introduction

This facility shall establish a training program plan which is site specific and provides a worksite analysis to prevent and control hazards. Household Hazardous Waste (HHW) staff training shall include Department of Transportation (DOT), Hazardous Categorization, and Occupational Health and Safety Administration (OSHA) as it relates to this county’s specific training plan. Injuries to HHW staff and resources cost money; effective safety training programs pay for themselves in risk vs benefit.

# 2. General HHW program training requirements

2.1 Determine designated employee. The employee dedicated to ensuring compliance with HHW training requirements is the [Facility Manager]. This person shall ensure facility staff are provided with and successfully complete required training.

2.2 Include site-specific information. Training is specific to program needs and job expectations and will be presented in a manner staff comprehend and understand (e.g., language barriers). [HW rules](https://www.pca.state.mn.us/sites/default/files/w-hw1-09c.pdf) require training specific to jobs or tasks related to HW management.

2.3 Ensure proper training. Prior to processing hazardous waste, staff shall complete Hazardous Categorization, Occupational Safety, and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER), Department of Transportation (DOT), or equivalent trainings. Staff shall receive training within six months of hire or starting a new position or be supervised by experienced staff until trained, including instruction on:

* Specific operations in work areas where chemicals are present*.*
* Safe work practices appropriate for limiting exposure for specific jobs.
* Purpose, use, and limitations of personal protective clothing (PPE) and equipment.
* Responding to emergency situations that may cause exposure*.*
* The importance of staff protection by using engineering and work practice controls.
* The importance of immediately reporting adverse health signs or symptoms.
* Spill response in the event of an emergency (e.g., protocol, clean-up procedures, specific duties, or assignments).
* Dispute resolution to manage unruly participants.

2.3.1 Trainer qualifications. Trainers shall be well-versed in the subject matter being presented. Trainers shall have satisfactorily completed a training program for instruction on subjects expected to be taught or shall have the academic credentials and instructional experience necessary for teaching the subject. Trainers shall demonstrate competent instructional skills and knowledge of the subject material.

2.3.2 Certifications. The State annually provides initial and refresher trainings free of charge to statewide HHW staff. Qualifying class participants shall receive a certification, documenting successful completion of the training. Certifications of training shall be kept current, which includes an annual 8-hour refresher course.

2.3.3 Equivalent training. Equivalent training includes academic, or knowledge received from actual HW site work experience. Staff shall provide documentation (e.g., copy of certifications) that prior work experience and/or training is equivalent to the training offered by the State. File this training documentation into each individual staff’s training file. New staff may use previous training as “equivalent,” if it can be documented and is current. Staff already certified with equivalent training shall still receive site-specific training prior to beginning work.

2.3.4 Site-specific training. Each job duty requires training specific to that task. Ensure all Facility staff receives the required training needed to do their job successfully and safely.

2.3.5 Training volunteers. Temporary staff or volunteers only on site occasionally or for a specific, limited task (e.g., assisting at a mobile collection event) and who are unlikely to be exposed over permissible exposure limits shall receive preliminary Right-to-Know training (e.g., tailgate training). These persons shall work under the direct supervision of trained and experienced Program staff; see *SOP 4.16, Event Site Management*.

2.3.6 Training records. Certificates, accompanying class agenda, and a specific training matrix (developed specifically for this program) shall be placed into each individual staff’s training file; see Attachment A of this SOP.

# 3. Department of Transportation (DOT) training requirements

**3.1 DOT training is required for staff with the following tasks.**

* Prepare hazardous materials (HM) for transport (by bulking or lab-packing)
* Has responsibility for HM safety.
* Load, handle, or unload HM.
* Operate HM transport vehicles.
* Sign shipment manifests.

**3.2 Systematic training.** DOT training shall be a systematic program to ensure staff has adequate knowledge on:

* HM recognition and identification
* The function-specific tasks appropriate of job duties
* Emergency response, self protection, and accident prevention measures
* DOT HM regulations

**3.3 Initial training.** DOT initial training shall be repeated every three years and be specific to the HHW Program; topics include:

* Safety awareness
* Function specific hazards
* DOT hazard classification
* Loading segregation
* Securing HM during transport
* Communications
* Incident reporting
* Packaging standards
* Transportation Security and Awareness Plans
* In-depth security

* 1. **Refresher training.** Staff shall receive annual refresher training by either attending the events offered by the State, or obtain equivalent training, e.g., DOT web-based and/or CD [Hazardous Materials Transportation Training Modules](https://dothazmat.vividlms.com/). DOT equivalent training is required to **include any new changes or updates** that have taken place during the previous year.

**3.5 Security awareness training.** HM staff shall receive annual security awareness training and in-depth security training, including:

* Awareness of risks
* En-route transport security
* How to recognize security risks
* How to respond to security threats
* Facility security objectives

Specific security procedures

Staff responsibilities

Security breach actions

Organizational security structure

# 4. OSHA Hazardous-categorization training requirements

Annual training. Staff responsible for preparing HM shipments for a licensed transporter is required to receive hazard categorization training (or equivalent training). This training is provided annually by the state contracted HW disposal companies and may include:

PPE

Routes of chemical entry

Hazard Categorization Guide

Bulking and grounding wastes

Lab packing wastes

Package marking and labels

Reactive or unknown wastes

Waste packaging specifications

Shipping day requirements

Department of Agriculture disclosure form

Product Chemical/Category List

Package inventory sheet usage

LDRs and manifesting

# 5. Health and safety training requirements

**5.1 When health and safety training is required.** Staff that regularly work in HHW facility areas having the potential for health hazards, or the possibility of an emergency, shall receive initial and refresher health and safety training. This training may include critique of incidents that have occurred in the past year which can serve as examples of work, and may also include:

Employee Right-to-Know

First Aid/CPR

AWAIR (A Workplace Accident and Injury Reduction Program)

OSHA recordkeeping

Radioactive wastes

Asbestos wastes

Air contaminants

Eye, face, and head protection

Hand and foot protection

OSHA poster

Hazard communication

Personal protective equipment

Respiratory protection

Medical surveillance

Bloodborne pathogens

Contingency, spill, and emergency response procedures plan

Powered industrial trucks (forklifts)

Lockout/tagout

EPA and OSHA regulations

Occupational health and toxicology

Hands on fire extinguishing methods

Recognizing and controlling hazards

Heat and cold stress

Ergonomics

Identifying and handling explosive and reactive materials

Emergency eyewash and showers

Noise and hearing conservation

Fire or flammable materials

**5.2 Training frequency**

5.2.1 Levels of training. OSHA outlines three levels of Hazardous Waste Operations and Emergency Response (HAZWOPER) training; 40-hour, 24-hour, and 8-hour annual refresher. Staff may not be required to receive the full 40 hours of OSHA HAZWOPER training, as it does not specifically apply to HHW operations and because staff is not permitted (or trained) to respond to large spills.

5.2.2 Initial training. Facility staff shall successfully complete the initial Minnesota HHW 3-day Health and Safety Course (or equivalent training) during the first year of employment. Until trained, staff shall work under the direct supervision of experienced Facility staff. Staff who have received physician approval for respirator use may be fit tested during this training time.

5.2.3 Refresher training. Staff engaged in HW processing that may potentially create health hazards shall receive annual refresher training by attending the events offered by the State (or equivalent training). This training shall be obtained annually.

**5.3 HAZWOPER training.** The Minnesota HAZWOPER training course has been tailored to match the needs of the HHW Program. HAZWOPER is included in the initial and refresher health and safety training offered annually by the State and includes:

Health, safety, or other hazards present on site

PPE selection and use

Work practices to minimize hazard risks

Medical surveillance requirements (e.g., recognition of symptoms and signs of over exposure)

Safe use of engineering controls and equipment

**5.4 Right-to-Know training (RTK).** Prior to managing HW, staff shall receive RTK training, including:

Overview of the HHW RTK Standard and Program

Location and availability of the facility’s written RTK program (e.g., SDS sheets, postings)

Physical and health effects of the chemicals (HHW chemical categories)

Instruction to read and interpret information on labels and SDS’s

Methods and observation techniques used to determine the presence of workplace chemicals

Techniques for reducing or preventing exposure to hazardous chemicals or physical agents by using prudent work practices or personal protective equipment

How to reduce or prevent exposure to chemicals or physical agents

Emergency procedures

Updates and reviews if new chemicals or processes are introduced into facility work areas

To have at least one first aid (and CPR) trained staff on-site during working hours if facility is located more than eight minutes away from reaching professional medical services

# Attachment A

## Individual HHW Facility Staff Training Matrix

### DOT Transportation, Hazardous Categorization, and Health and Safety

### Staff name:

### Job title:

### Date of hire:

Except as noted, the above individual shall complete all training listed in the plan below within 30 days of hire or be under direct supervision of experienced staff. Annual review of each initial training topic shall occur within two weeks of the anniversary date of hire. This record documents successful completion of HHW trainings and shall be maintained in the individual’s training file. Additional training may be added following staff review of required information. HHW facility staff shall complete the training tracts as outlined in the order listed below (going from less to more comprehensive job tasks).

| **Job duties** | **Date training completed** | **Trainer** | **Facility manager or supervising staff initials** | **Training plan content  (check applicable boxes)** |
| --- | --- | --- | --- | --- |
| Greet & survey participants  Control traffic  Placing materials on product exchange for reuse  Add duties as needed |  |  |  | Review SOP # 4.15 Product Exchange Management  Add training as needed |
| Identify and profile HW  Receive or unload wastes  Select, label and mark containers  Place HW in containers  Bulk or lab-pack wastes  Prepare lab packs for storage  Place containers in storage  Prepare or stage containers for highway transport  Ensure PPE use  Managing nonhazardous wastes  Add duties as needed |  |  |  | Hazard Categorization: attend annual refresher and/or equivalent training  Health and Safety (HAZOPER); attend initial 24-hr then annual refresher and/or equivalent training  DOT and Security: attend initial one time every three years then annual refresher and/or equivalent training  Review, complete, & document DOT Training Module  Review annually updated HW contractor guideline manual (provided by the State’s HW company) including example drum labels for all common wastes shipped  Received experience through hands-on training  Review SOP # 1.1 OSHA  Review SOP # 1.2 RCRA HW  Review SOP # 1.3 DOT  Review SOP # 2.1 AWAIR  Review SOP # 2.3 Employee Right to Know  Review SOP # 2.4 PPE  Review SOP # 2.8 Powered industrial trucks w/checklist (forklifts)  Review SOP # 2.9 Lockout/tagout  Review SOP # 2.10 Emergency Contingency Plan & Spill Response  Review SOP # 2.11 Ergonomics  Review SOP # 2.12 Hearing conservation  Review SOP # 3.3 Treating HHW  Review SOP # 4.1 Receiving wastes from participants  Review SOP # 4.2 Waste Sorting  Review SOP # 4.3 Abandoned & Unknown wastes  Review SOP # 4.4 Waste Packaging  Review SOP # 4.5 Waste Bulking  Review SOP # 4.7 Can crushing  Review SOP # 4.9 Explosive and reactive  Review SOP # 4.10 On site laboratory operations  Review SOP # 4.11 Waste Storage  Review SOP # 4.12 Waste staging for shipment  Review SOP # 4.14 Security Issues  Review SOP # 4.17 Ag generated pesticides  Review SOP # 4.18 Universal wastes  Review SOP # 4.19 Radioactive wastes  Review SOP # 4.20 Meth lab wastes  Review SOP # 4.21 Pharmaceutical wastes  Review SOP # 4.22 Asbestos wastes  Review SOP # 5.1 Equipment maintenance  Review SOP # 6.1 Floor coating  Review SOP # 6.2 Ventilation  Add training as needed |
| Process aerosol containers  Process cylinder containers  Add duties as needed |  |  |  | Review SOP # 4.6 Can puncturing: hand fed/mechanical types  Review SOP # 4.8 Cylinder evacuation and valve removal  Add training as needed |
| Prepare for Emergencies  Respond to spills  Provide CPR or First Aid response  Add duties as needed |  |  |  | Review site specific plan for emergency response, spill response, explosives, and PPE  Review site maps for location of fire extinguishing equipment  Attended annual 8- hour classroom CPR training  Attended bi-annual First Aid Training  Attended Bloodborne Pathogens Training  Review SOP # 2.7 Bloodborne Pathogens  Review SOP # 2.10 Contingency Plan  Review SOP # 4.14 Security Issues  Review SOP # 4.23 Mercury wastes  Add training as needed |
| Coordinate a remote mobile collection event  Maintain contingency plan and awareness  Add duties as needed |  |  |  | Review and update the facility Emergency Contingency Plan annually  Review SOP # 2.13 Medical Monitoring Program  Review SOP # 4.16 Event Site Management  Add training as needed |
| Training volunteers  Add duties as needed |  |  |  | Provide Right to Know tailgate training (includes AWAIR and Right to Know)  Review SOP # 2.2 AWAIR  Add training as needed |
| Perform weekly inspections of HW containers  Perform weekly inspections of Facility safety equipment  Add duties as needed |  |  |  | Review facility site inspection policy (trained verbally by experienced Facility staff)  Review container label and marking requirements following the State’s contracted HW disposal company guidance manual  Add training as needed |
| Submit annual data to the State  Add duties as needed |  |  |  | Review SOP # 3.1 Notification of Program Changes  Review SOP # 3.2 > 90-day site standard for a permanent HHW facility  Review SOP # 3.4 Participant Tracking (Greater MN) & Annual reporting  Add training as needed |
| Sign or review manifests  Add duties as needed |  |  |  | Review SOP # 3.5 DOT Demo for manifest signature  Review SOP # 3.6 Manifest tracking & LDRs  Add training as needed |
| Use Respirators  Add duties as needed |  |  |  | If respirators are used, staff shall review the written respirator program  Inspect respirator (prior to each use), clean and properly store respirator  Review SOP # 2.5 Respirator Program  Add training as needed |
| Perform OTG, MQG or VSQG Program Operations  Add duties as needed |  |  |  | Attend DOT “Train the Trainer” course  Review “Transportation Guidelines for VSQG Collection Program” booklet  Review 49 CFR DOT transportation requirements  Attend MPCA 10 Steps to Compliance Workshop  Review SOP # 3.7 Minimal Quantity generators  Review SOP # 3.8 OTG & VSQG generators - licensing  Review SOP # 4.13 Shipping Papers and tracking waste  Review MPCA fact sheet:  www.pca.state.mn.us/publications/w-hw2-50.pdf  Review MPCA fact sheet:  <https://www.pca.state.mn.us/sites/default/files/w-hw2-51.pdf>  Add training as needed |

I have successfully completed all the above (checked) HHW trainings.

HHW facility trainee signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_