



Step 9: Personnel Training for Small Quantity Generators

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This fact sheet discusses hazardous waste training requirements for small quantity hazardous waste generators. It is Step 9 in the "10 Steps to Compliance" series.

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Environmental Concerns

Improper waste handling or disposal can result in contamination of soil and water. It may also increase employee exposure to hazardous materials. The end result is increased cost to the employer.

Waste Prevention

The best way to prevent generating unnecessary waste and to avoid problems relating to hazardous waste is to thoroughly train employees on how to perform their job duties safely and properly. This knowledge can lead to improved efficiency and reduced waste. Good training may also enable employees to identify ways to improve performance and processes.

Training

It's not only a good idea to teach employees how to handle hazardous waste correctly and how to respond to emergencies, it's the law (*Minnesota Rules pt. 7045.0292 subpt.5*). This training is in addition to the employee right-to-know training required by Occupational Safety and Health Administration (OSHA) regulations and the hazardous materials training required by Department of Transportation (DOT) regulations. (However, all three types of training cover similar and compatible information and may be successfully combined into one training program. Remember, documentation must meet requirements of all three programs.)

To determine what kind of training each employee needs, identify her/his job responsibilities. (Employees whose responsibilities include hazardous waste

management, storage, transport or record keeping require hazardous-waste training. The MPCA strongly recommends training **all** employees in emergency response procedures.) Make sure each employee that is required to manage hazardous waste is trained sufficiently to fulfill her/his responsibilities correctly. Small quantity generators of hazardous waste must ensure that employees who require training have received it within six months of the date of their employment or a change in job responsibilities.

Training topics may include:

- Managing hazardous waste containers: including choosing proper containers, marking and labeling containers, and proper container handling.
- Accumulating waste, including: storage time limits, satellite accumulation, adequate aisle space, keeping containers closed and separating incompatible wastes.
- Inspecting stored waste; documenting weekly inspections.
- Shipping procedures: including use of manifests and other tracking/disposal records.
- Preparing containers for shipping.
- Responding to emergencies, including: locating and maintaining emergency equipment, reporting spills and reviewing specific emergency procedures developed for your company. (If you don't have anyone on staff trained to respond to a hazardous waste spill or release, your emergency procedures may include calling a company



specializing in emergency cleanup to come to your site to manage a spill or release.)

- Keeping required records.

Training may be provided by a qualified member of your staff. The training should reflect employee responsibilities and procedures specific to your company. **Although you are not required to train employees in areas for which they are not normally responsible, it may be advantageous to provide more training than is needed, for these reasons:**

- If the employee responsible for a specific duty is not available, another employee can easily fill in (employees cannot perform a hazardous waste-related duty for which they are not properly trained unless directly supervised).
- It may be easier to prepare training for several employees and train them all at one time, rather than to perform individual training.
- Employees who have a broad knowledge of systems and how their responsibilities affect the company may be more readily able to identify time and/or cost-saving procedures for the company.
- In order to respond quickly to emergencies, it is important for **all** staff to be trained in emergency procedures and use of the emergency telephone posting (see Hazardous Waste fact sheet #1.08b, *Emergency Planning for SQGs*).

Training Resources

The Minnesota Pollution Control Agency (MPCA) offers a series of fact sheets, provided at no charge, which may help you train employees. For a list of available fact sheets, visit the MPCA web site at <http://www.pca.state.mn.us> under “Waste/ Publications/ For Businesses.” For a paper copy, call your metropolitan county or the MPCA office nearest you and request Hazardous Waste fact sheet #0.00, *Hazardous Waste Fact Sheet Checklist*.

The MPCA and metropolitan counties offer compliance workshops that can help train your trainers and employees. Because personnel training should be specific to your company, businesses who use these workshops to train employees should supplement the training with company-specific information. For information about upcoming workshops, check the MPCA web site or call your metropolitan county or the MPCA office nearest you at the telephone numbers provided.

Required Paperwork

Each business must keep good training records. The form on page three is one way to do it. (Copy as many as you need.)

Use of this form is not required — you may design your own. Records should include the employee’s name, job title and responsibilities, training date and content, and signature.

Personnel training records must be kept on site and available for review for at least three years from the date of an employee’s termination from the company.

For More Information

Your metropolitan county and the MPCA have staff available to answer your questions about hazardous waste management and training. For more specific information or to request any of the fact sheets, contact your metropolitan county hazardous waste office or the MPCA office closest to your county.

Metro County Hazardous Waste Offices

Anoka County	(612)422-7093
Carver County	(952)361-1800
Dakota County	(952)891-7020
Hennepin County	(612)348-8100
Ramsey County	(651)773-4466
Scott County	(952)496-8177
Washington County	(651)430-6655

Minnesota Pollution Control Agency

Toll free	(800)657-3864
Brainerd	(218)828-2492
Detroit Lakes	(218)847-1519
Duluth	(218)723-4660
Marshall	(507)537-7146
Rochester	(507)285-7343
St. Paul	(651)297-2274
Willmar	(320)214-3786

Web Site <http://www.pca.state.mn.us>

Other hazardous waste fact sheets

<http://www.pca.state.mn.us/waste/pubs/business.html>



RECORD OF EMPLOYEE HAZARDOUS WASTE MANAGEMENT TRAINING

Employee Name _____ Job Title _____

Employee's Hazardous Waste Management and/or Emergency Response Duties

SUMMARY OF HAZARDOUS WASTE TRAINING

Date of training _____ *Type of training: ___ introductory ___ refresher

Instructor Name _____ Employee signature _____

Check the areas covered during hazardous waste training (Minnesota Rule 7045.0292, subp. 5.H.(3) requires that Small Quantity Generators ensure and document that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies.):

License Requirements		Manifests		Emergency Response	
	Management plans		Proper completion		Available emergency equipment
	License posted		Copy distribution		Use of equipment
Accumulation of Wastes			Land disposal restriction notices		Equipment locations
	Hazards of each waste	Record Keeping			Maintenance of equipment
	Storage time limits		Container/tank inspections		Telephone posting
	Satellite accumulation		Personal training		Response to spills
Containers			Manifests/shipping papers		Response to fires
	Labeling and marking		Annual reports		Response to explosions
	Keeping containers closed	Waste Minimization			Local authority arrangements
	Weekly inspections		Reduce/ reuse/ recycle		Evacuation routes
	Aisle space	Other (specify)			
	Outdoor storage				
	Indoor storage				
Tanks					
	Labeling				
	Inspections				

*SQGs are not required to conduct annual review sessions of hazardous waste training. However, additional training sessions must be conducted for situations such as:

- hiring of new employees with hazardous waste and/or emergency response duties
- change in employee's hazardous waste duties (e.g., change in emergency coordinator)
- change in hazardous wastes generated by the company