



Employee Training for Very Small Quantity Generators

Step 9 in the [10 Steps to Hazardous Waste Compliance series](#)

The most effective way to reduce the inherent risks that hazardous wastes present is to train your employees.

This fact sheet will discuss the hazardous waste employee training requirements administered by the Minnesota Pollution Control Agency (MPCA) and the Metropolitan Counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington (Metro Counties).

Your employee hazardous waste training requirements are determined by your site's hazardous waste generator size. See MPCA fact sheet #w-hw1-02, Determine Generator Size, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-02.pdf>.

This fact sheet will address Very Small Quantity Generator (VSQG) requirements. For other size generators, see:

- MPCA fact sheet #w-hw1-09b, Employee Training for Small Quantity Generators, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-09b.pdf>.
- MPCA fact sheet #w-hw1-09c, Employee Training for Large Quantity Generators, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-09c.pdf>.

What are my employee training requirements?

Though the Minnesota Hazardous Waste Rules do not require VSQGs to provide hazardous waste training, you may be required to train your employees under the regulations of the U.S. Occupational Safety & Health Administration (OSHA) and the U.S. Department of Transportation (DOT).

- OSHA's Hazard Communication Standard (HCS) requires that all your employees be trained in the identity, hazards, labeling, leak detection, and spill response of chemical products present in their workspaces.
- In addition to HCS training, OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) training is required if employees have emergency response duties during hazardous waste incidents or if they will clean up anything larger than incidental spills in their immediate work area. For questions about the HCS or HAZWOPER training requirements, contact OSHA or the Minnesota OSHA. See [More information](#) on page 2.
- DOT's Hazardous Materials Regulations (HMR) require training in hazardous material characterization, packaging, and manifest preparation for employees who package hazardous wastes to be manifested off-site for disposal or who sign manifests. This training must be provided within 90 days of the date when the employees begin these hazardous waste-related duties and recur at least every three years. For questions about HMR training requirements, contact the DOT or Minnesota DOT. See [More information](#) on page 2.

Beyond this mandatory training, the MPCA recommends that you train all of your employees in the steps you want them to take during foreseeable hazardous waste emergencies, such as spills and fires. The MPCA recommends that all employees who generate hazardous waste be trained in how to recognize, containerize, and label the wastes they work with. This training is your best method to prevent potentially costly spills and other hazardous waste incidents.

What can I use to train my employees?

The MPCA, OSHA, and DOT all allow you to use any method and resources appropriate to train your employees, including on-the-job training, publications from the MPCA or other organizations, and classroom or video presentations.

The MPCA has published fact sheets on a wide variety of hazardous waste-related topics, all available at <https://www.pca.state.mn.us/waste/hazardous-waste-documents-and-forms>.

The MPCA also has posted videos of basic hazardous waste training on its website. See MPCA fact sheet #p-tr2-16, Online Training Directions, at <https://www.pca.state.mn.us/sites/default/files/p-tr2-16.pdf>.

The Minnesota and federal DOT and Minnesota and federal OSHA also have published many educational and training materials on their websites. See [More information](#) below.

You may use MPCA form #w-hw1-09d, Hazardous Waste Management Training Record, at <https://www.pca.state.mn.us/sites/default/files/w-hw1-09d.doc>, to document your employees' training, or another form or method appropriate to your site.

More information

Guidance and requirements in this fact sheet were compiled from Minnesota Rules, Chapter 7045. To review Minnesota Rules, visit the Office of the Revisor of Statutes at <https://www.revisor.mn.gov/pubs>.

For information about waste minimization, contact the Minnesota Technical Assistance Program (MnTAP). The MPCA's Small Business Environmental Assistance Program can offer free, confidential compliance assistance. Immediately report all hazardous waste spills that may reach the environment to the Minnesota Duty Officer.

Metro County Hazardous Waste Offices

Anoka	763-422-7093
.....	https://www.anokacounty.us/
Carver	952-361-1800
.....	http://www.co.carver.mn.us/
Dakota	952-891-7557
.....	https://www.co.dakota.mn.us/
Hennepin	612-348-3777
.....	http://www.hennepin.us/
Ramsey	651-266-1199
.....	https://www.ramseycounty.us/
Scott	952-496-8475
.....	http://www.scottcountymn.gov/
Washington	651-430-6655
.....	https://www.co.washington.mn.us/

Minnesota Technical Assistance Program

Toll free	1-800-247-0015
Statewide	612-624-1300
.....	http://www.mntap.umn.edu

Small Business Environmental Assistance Program

Toll free	1-800-657-3938
Statewide	651-282-6143
.....	https://www.pca.state.mn.us/sbeap/

Minnesota Pollution Control Agency

Toll free	1-800-657-3864
Statewide	651-296-6300
.....	https://www.pca.state.mn.us/

Minnesota Duty Officer

Toll free	1-800-422-0798
Statewide	651-649-5451

Minnesota Occupational Safety & Health Administration

Statewide	651-284-5050
.....	http://www.dli.mn.gov/mnosha.asp

U.S. Occupational Safety & Health Administration

Toll free	1-800-321-6742
.....	https://www.osha.gov/

Minnesota Department of Transportation

Hazardous Materials	651-215-6330
.....	http://www.dot.state.mn.us/

U.S. Department of Transportation

Hazardous Materials	1-800-467-4922
.....	http://www.phmsa.dot.gov/