



# Employee Training for Large 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 Large Quantity Generator (LQG) requirements. For other size generators, see:

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

## What are my employee training requirements?

LQGs must train:

- Employees generating or handling hazardous waste.
- Employees preparing hazardous waste-related records, such as manifests and inspection logs.
- Employees designated to respond to or manage hazardous waste spills and incidents.
- Emergency Coordinators. For more information about Emergency Coordinators – required for LQGs – see MPCA fact sheet #w-hw1-08c, Emergency Planning for Large Quantity Generators at <https://www.pca.state.mn.us/sites/default/files/w-hw1-08c.pdf>.

**Exception:** Employees whose only hazardous waste duties are working with hazardous waste satellite accumulation containers. While these employees are not required to be trained under the hazardous waste regulations, the MPCA encourages you to train all your staff with hazardous waste-related duties. This training is your best method to prevent potentially costly spills and other hazardous waste incidents.

In addition, you may be required to train your employees under other regulations, such as those 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 in your workplace.
- 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 3.
- 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. For questions about the HMR training requirements, contact the DOT or Minnesota DOT. See [More information](#) on page 3.

## When must my employees be trained?

Train your employees within six months of the date they begin their hazardous waste-related duties.

### Exceptions:

- Prospective emergency coordinators must be trained prior to acting as an emergency coordinator or being listed in your site's hazardous waste contingency plan. For more information about contingency plans – required for LQGs – see MPCA fact sheet #w-hw1-08c, Emergency Planning for Large Quantity Generators at <https://www.pca.state.mn.us/sites/default/files/w-hw1-08c.pdf>.
- Employees who package hazardous wastes for shipment or sign hazardous waste manifests must be trained under the HMR within 90 days of beginning their hazardous waste shipment-related duties.

You must provide annual refresher hazardous waste training to all employees with hazardous waste-related duties.

## How must I train my employees?

Your hazardous waste training program must be directed by a hazardous waste training *program director* who is trained in hazardous waste management. Your program director does not need to be an employee, but must be familiar with all aspects of your site, processes, and procedures. The hazardous waste training program they prepare must be based on your site's practices; generic hazardous waste training alone is not sufficient.

Ensure that your program director completes all these training steps:

1. List each job title at your site that includes hazardous waste-related duties. Remember to include emergency coordinators, recordkeeping staff, and your program director, if they are an employee.
2. Prepare a written job description for each position identified in #1. Each job description must include:
  - Normal hazardous waste-related duties of the position.
  - Emergency duties, including those described in the site's contingency plan.
  - Required job qualifications, skills, and education.
3. Draft a hazardous waste training plan for each job description. Each training plan must be specific to the job description and identify the content and type of both initial and refresher hazardous waste training required for the position.
4. Provide the training described in each job description's hazardous waste training plan within the time limits discussed in [When must my employees be trained?](#) above.
5. Document the training provided to each position identified in #1. The training records must include the:
  - Name of employee filling the position.
  - Date employee began hazardous waste duties in the position.
  - Date each training was provided.

Keep hazardous waste training records for at least three years after an employee stops their hazardous waste-related duties.

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.

You may keep training records in either hardcopy or electronic form, but they must be accessible from your generation site. See MPCA fact sheet #w-hw1-10, Keep Hazardous Waste Records at <https://www.pca.state.mn.us/sites/default/files/w-hw1-10.pdf>.

# What methods or resources may 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 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 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 have published many educational and training materials on their websites. See [More information](#) below.

Remember: You must train your employees in your site's specific hazardous waste management. Providing only generic training from the MPCA or another source is insufficient.

## 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
.....	<a href="https://www.anokacounty.us/">https://www.anokacounty.us/</a>
Carver .....	952-361-1800
.....	<a href="http://www.co.carver.mn.us/">http://www.co.carver.mn.us/</a>
Dakota .....	952-891-7557
.....	<a href="https://www.co.dakota.mn.us/">https://www.co.dakota.mn.us/</a>
Hennepin .....	612-348-3777
.....	<a href="http://www.hennepin.us/">http://www.hennepin.us/</a>
Ramsey .....	651-266-1199
.....	<a href="https://www.ramseycounty.us/">https://www.ramseycounty.us/</a>
Scott .....	952-496-8475
.....	<a href="http://www.scottcountymn.gov/">http://www.scottcountymn.gov/</a>
Washington .....	651-430-6655
.....	<a href="https://www.co.washington.mn.us/">https://www.co.washington.mn.us/</a>

### Minnesota Technical Assistance Program

Toll free .....	1-800-247-0015
Statewide .....	612-624-1300
.....	<a href="http://www.mntap.umn.edu">http://www.mntap.umn.edu</a>

### Small Business Environmental Assistance Program

Toll free .....	1-800-657-3938
Statewide .....	651-282-6143
.....	<a href="https://www.pca.state.mn.us/sbeap/">https://www.pca.state.mn.us/sbeap/</a>

### Minnesota Pollution Control Agency

Toll free .....	1-800-657-3864
Statewide .....	651-296-6300
.....	<a href="https://www.pca.state.mn.us/">https://www.pca.state.mn.us/</a>

### Minnesota Duty Officer

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

### Minnesota Occupational Safety & Health Administration

Statewide .....	651-284-5050
.....	<a href="http://www.dli.mn.gov/mnosha.asp">http://www.dli.mn.gov/mnosha.asp</a>

### U.S. Occupational Safety & Health Administration

Toll free .....	1-800-321-6742
.....	<a href="https://www.osha.gov/">https://www.osha.gov/</a>

### Minnesota Department of Transportation

Hazardous Materials .....	651-215-6330
.....	<a href="http://www.dot.state.mn.us/">http://www.dot.state.mn.us/</a>

### U.S. Department of Transportation

Hazardous Materials .....	1-800-467-4922
.....	<a href="http://www.phmsa.dot.gov/">http://www.phmsa.dot.gov/</a>