



Colorado Department
of Public Health
and Environment

HAZARDOUS WASTE GUIDANCE

PERSONNEL TRAINING
for
LARGE QUANTITY GENERATORS
of
HAZARDOUS WASTE

Guidance for the requirements for businesses that generate 1,000 kg (about 2,200 pounds) or more of hazardous waste per month or greater than 1 kg (about 2.2 pounds) of acutely hazardous waste per month. All regulatory requirements provided in this guidance are from The Colorado Hazardous Waste Regulations found at 6 CCR 1007-3, and may be paraphrased to emphasize the requirements specific to the topics of this guidance document.

March 1997

Purpose of this Guidance

This is intended as general guidance for generators of hazardous waste and is meant to assist in compliance with the hazardous waste regulations. The guidance is not meant to modify or replace the promulgated regulations which undergo periodic revisions. In the event of a conflict between this guidance and promulgated regulations, the regulations govern. Some portions of the hazardous waste regulations are complex and this guidance does not go into the details of these complex situations. If a regulatory situation is not described in the guidance or clarification is desired, an official interpretation of a specific hazardous waste regulation can be requested by writing to the Hazardous Materials and Waste Management Division at the address on page 8.

We would appreciate any comments or suggestion for making improvements in future editions. Suggestions or comments can be sent to the address on page 8.

PERSONNEL TRAINING

Regulatory Requirement - Section 262.34(a)(4)

“... a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that ... the generator complies with the requirements for owners or operators in ... Section 265.16 ...”

Regulatory Requirement - Section 265.16(a)(1)

“Facility personnel must successfully complete a program of classroom instruction and on-the-job training that teaches them to perform their duties in a way that ensures the facility=s compliance with the requirements of this part.”

Interpretive Guidance

The primary regulatory areas included in Part 265 with which generators must comply are: preparedness and prevention, contingency plan and emergency procedures, personnel training, use and management of containers, tanks, drip pads, containment buildings, and air emission standards. Your facility can combine hazardous waste personnel training with other regulatory program training requirements if the specific requirements of Section 265.16 are also met. If your training program combines requirements for different regulatory programs a description of how the training meets the hazardous waste requirements is recommended.

Interpretive Guidance

The levels of training needed to meet the requirements of Section 265.16:

- 1) Facility personnel must be familiarized with your facility’s contingency plan so they can respond effectively in an emergency. This requirement also includes personnel not directly involved with the management of hazardous waste but who may be affected by a hazardous waste incident.
- 2) Facility personnel involved in the management of hazardous waste or the documentation of hazardous waste activities must have training which is specific to their job duties. It is expected that the job-specific training necessary will be as varied as the job duties present in your facility.

Regulatory Requirement - Section 265.16(a)(2)

“This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures, (including contingency plan implementation) relevant to the positions in which they are employed.”

Interpretive Guidance

The training program needs to be managed by a person qualified by either experience or education in hazardous waste management. This individual should be knowledgeable in hazardous waste regulatory requirements and implementation and needs to be familiar with the specific hazardous waste issues at your facility. It is likely that your facility environmental officer will meet this

requirement.

For on-the-job training, the instructor should be a supervisor or an individual who is skilled in the current methods of facility operations and duties of the job. The hazardous waste training program needs to be specific to the job duties at your facility. Training should be structured so that it parallels, as realistically as possible, the actual job duties and should take into account the educational level of the class. Measures of training effectiveness can be performance-based, or by written or oral test.

Facility personnel are responsible for learning only those hazardous waste management procedures necessary for the positions in which they are employed. This requirement includes those personnel responsible for the management of documentation related to the management of hazardous waste. For example, office staff responsible for maintaining hazardous waste manifests and LDR records should be trained on the necessity of this paperwork and appropriate methods for maintenance of these documents.

On-the job and annual refresher training may be conducted as part of regularly scheduled meetings such as monthly safety meeting for work groups. Computer-based training, electronic memos, and read only training could also meet these training requirements.

Regulatory Requirement - Section 265.16(a)(3)

“At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:

- (i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- (ii) Key parameters for automatic waste feed cut-off systems;
- (iii) Communications or alarm systems;
- (iv) Response to fires or explosions;
- (v) Response to ground-water contamination incidents; and
- (vi) Shutdown of operations.”

Interpretive Guidance

Facility personnel, despite their position must have emergency response training so they can respond effectively in an emergency. For example, if there is an evacuation due to volatilization of spilled hazardous waste, most of the employees will be responsible for vacating the premises in a predetermined manner. Other properly trained personnel will be responsible for containing the spill, informing local officials, bringing out firefighting equipment, etc. In addition to the emergency-related training elements described here, the training program should contain basic hazardous waste management procedures (e.g., waste identification and determinations, manifests, packaging, accumulation, container and tank management, inspections, etc.) for select individuals as necessary [265.16(a)(2)].

Regulatory Requirement - Section 265.16(b)

“Facility personnel must successfully complete the training program required in paragraph (a) of this section within six months after the date of their employment or assignment to a facility, or assignment to a new position at a facility. Employees must not work in unsupervised positions until they have completed the training requirements of paragraph (a) of this section.”

Regulatory Requirement - Section 265.16(c)

“Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.”

Interpretive Guidance

This refresher training should be specific to individual employee job duties related to hazardous waste management. (Colorado interprets annual to mean within 13 months of the last training).

Regulatory Requirement - Section 265.16(d)(1)

“The owner or operator must maintain the following documents and records at the facility:

(1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;”

Interpretive Guidance

Job title (*Section 265.16(d)(1)*) - This requirement excludes staff not involved in the management of hazardous waste at your facility. Job titles used to satisfy this requirement do not need to match those used for personnel management. For example, your Administrative Assistant may be responsible for hazardous waste manifest preparation and retention, and you may choose to define this job title as “Environmental Clerk”. The job title may describe a class of employees with specific hazardous waste management duties.

Regulatory Requirement - Section 265.16(d)(2)

“(2) A written job description for each position listed under paragraph (d)(1) of this section. The description may be consistent in its degree of specificity with description for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;”

Interpretive Guidance

Job description (*Section 265.16(d)(2)*) - The description of duties and responsibilities for each job title need only include those duties that are directly related to hazardous waste management. It is not necessary to include other duties unless they affect or impact hazardous waste-related duties. For example, the job description for the administrative assistant who serves as an environmental clerk need only include the manifest preparation and retention responsibilities, and no other duties that the person may perform in their position.

Regulatory Requirement - Section 265.16(d)(3)

“(3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section;”

Interpretive Guidance

Training description (*Section 265.16(d)(2)*) - Outlines of training programs or training matrices may be used to fulfill this requirement. Attached to this guidance is an example matrix of personnel training requirements for a hypothetical facility that illustrates the different types of job titles (described above) and the training requirements associated with each job category.

Regulatory Requirement - Section 265.16(d)(4)

“(4) Records that document that the training or job experience required under paragraphs (a), (b), and (c) of this section has been given to, and completed by, facility personnel.”

Interpretive Guidance

Employee participation documentation (*Section 265.16(d)(4)*) - Substantiated performance measures (tests, etc.), class lists with signatures, individual training logs in personnel files, or spreadsheets can be used for this documentation. Your system of training documentation needs to be easily understood and readily accessible.

Regulatory Requirement - Section 265.16(e)

“Training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.”

Interpretive Guidance

The training records required are for those employees who are directly involved with hazardous waste management at your facility. Documentation of training provided to other employees who may only be affected by a hazardous waste incident could consist of a general description of “awareness” training, and documented in accordance with the appropriate regulatory requirement (e.g., OSHA, Fire Code).

This personnel training guidance may also be useful for owners and/or operators of facilities preparing permit applications for the treatment/storage/disposal (TSD) of hazardous waste. TSD facilities must include the facility contingency plan in their training program. Facility specific training requirements will be developed based on training information provided in the permit application and will be specified in any hazardous waste permit issued for a TSD facility.

FREQUENTLY ASKED QUESTIONS

1. What is the purpose of the personnel training requirement?

The purpose of the personnel training requirement is to reduce the potential for mistakes and accidents which might threaten human health or the environment. This requirement ensures that facility personnel working in jobs that involve hazardous waste management will be thoroughly familiar with their duties and responsibilities. In this training employees should be made aware of why they must perform certain tasks in a defined manner. Providing employees with a thorough explanation of how and why certain operations are to be performed should reduce the use of “short-cut” procedures that may lead to accidents and emergency situations.

2. What does the term “facility personnel” mean?

“Personnel” or “facility personnel” means all persons who work at, or oversee the operations of, a hazardous waste facility, and whose actions or failure to act may result in noncompliance with the requirements of Parts 264 or 265 of these regulations. *The Colorado Hazardous Waste Regulations 6 CCR 1007-3, Section 260.10*

In other words, all personnel (supervisors, nonsupervisory personnel, administrative, operations, maintenance, contractors, etc.) who are actively engaged in the hazardous waste operations of the facility and are responsible for, or may be impacted by, hazardous waste activities require the type of training which is described in this guidance.

3. When must facility personnel be trained?

Initial hazardous waste training must be completed within six months after employment or reassignment to a new position. It is preferable to provide the introductory training at the time the employee assumes the new position. However, new employees not having completed their introductory training and who will be performing hazardous waste management tasks associated with their new position must be supervised at all times. Facility personnel also need to have an annual review of their initial training.

4. Does annual training have to be provided at one time?

No, training can be done in regularly scheduled meetings as long as documentation can be provided to prove that the proper training has been given and completed by facility personnel.

5. What does annual review mean?

Annual review means a review of the initial training within 13 months of the prior training.

6. Do all clerical workers need to be trained in the management of hazardous waste?

No, office staff responsible for maintaining hazardous waste shipping manifests and LDR records should be trained on the importance of this paperwork and appropriate methods for maintenance of these

documents. Other office or facility workers, not involved in hazardous waste management, must be familiarized with your facility's contingency plan and evacuation procedures, if necessary for their protection in the event of a hazardous waste incident.

7. Are we responsible for providing training to contractors that come into our facility to perform jobs that result in the generation or management of hazardous waste?

You could require your contractor's employer to provide general health and safety training related to hazardous waste as a condition of your contract with them. Site-specific issues (e.g., evacuation routes, emergency communications and alarms) could be provided by you prior to the contractor beginning work. In addition, the contractors should be supervised by facility personnel to ensure the proper management of hazardous waste that may be generated or managed as a result of the contractor's job. In some cases, your contract may actually stipulate who the hazardous waste generator is - you or the contractor. In cases where the contractor is the generator, that contractor's employer is independently responsible for personnel training.

8. Is it acceptable to use computer-based training to meet the hazardous waste training requirements?

Yes, it is the responsibility of your facility to define the type and scope of the training programs. The training programs should assure that your employees have or will have acquired the necessary training and management skills needed to perform their jobs in a competent manner that will ensure compliance with regulatory requirements and protect human health and the environment. The effectiveness of such training can be qualified by performance-based audits of facility personnel.

9. Does OSHA or HAZWOPER training meet all of the RCRA training requirements?

No, some of the RCRA training requirements may be met by these programs but OSHA or HAZWOPER training alone does not totally satisfy RCRA. Hazardous waste training is required to be tailored to the specific hazardous waste duties of facility personnel.

PHONE NUMBERS

24-hour Emergency Response Line (toll-free)	(877) 518-5608
Colorado Department of Public Health and Environment	(303) 692-2000
Pollution Prevention Program	(303) 692-2977
Hazardous Materials and Waste Management Division	(303) 692-3300
(HMWMD) toll-free	(888) 569-1831
HMWMD Technical Assistance Line	(303) 692-3320
toll-free	(888) 569-1831 ext. 3320
HMWMD Website	www.colorado.gov/cdphe/hm
HMWMD E-mail	comments.hmwmd@state.co.us

Other Phone Numbers:

National Response Center	(800) 424-8802
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Send questions in writing to:

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
HMWMD-B2
4300 Cherry Creek Drive South
Denver, CO 80246-1530

OR

FAX (303) 759-5355

**EXAMPLE PERSONNEL TRAINING REQUIREMENTS
FOR LARGE QUANTITY GENERATORS OF HAZARDOUS WASTE***

TRAINING ELEMENT	GENERIC JOB CATEGORY							
	Environmental Manager (1)	Environmental Clerk (2)	General Office Personnel (3)	Production Supervisor (4)	Maintenance Supervisor (5)	Haz. Waste Technician (6)	Plant Worker (Generator) (7)	General Plant Worker (8)
Hazardous waste regulations	Y							
Making waste determinations	Y					Y		
Properties of facility wastes	Y	Y			Y	Y	Y	
Waste Minimization	Y	Y		Y	Y	Y	Y	Y
Reporting and record keeping	Y	Y				Y		
Accumulation (satellite / 90 day)	Y	Y		Y	Y	Y	Y	
Container and tank management	Y				Y	Y	Y	
Inspections	Y	Y			Y	Y	Y	
Waste packaging procedures	Y				Y	Y		
Pre-transportation (manifests, labels)	Y	Y				Y		
Contingency plan implementation	Y			Y	Y	Y	Y	
Emergency response procedures	Y			Y	Y	Y	Y	

TRAINING ELEMENT	GENERIC JOB CATEGORY							
	Environmental Manager (1)	Environmental Clerk (2)	General Office Personnel (3)	Production Supervisor (4)	Maintenance Supervisor (5)	Haz. Waste Technician (6)	Plant Worker (Generator) (7)	General Plant Worker (8)
Emergency equipment use, inspection, repair	Y				Y	Y		
Communications and alarms	Y	Y	Y	Y	Y	Y	Y	Y
Evacuation routes	Y	Y	Y	Y	Y	Y	Y	Y
Response to fire, explosion, and ground-water contamination incidents	Y			Y	Y	Y	Y	
Site shutdown procedures	Y			Y	Y	Y	Y	

* Training requirements for a hypothetical manufacturing facility. This table has been developed to be representative of an average facility. Job categories and associated training requirements will be specific to your facility and may not be identical to those presented in this table.

- (1) Responsible for the overall hazardous waste management functions at the facility.
- (2) Responsible for hazardous waste paperwork and record keeping functions. Has no direct contact with physical hazardous waste activities.
- (3) General administrative and clerical personnel. No responsibilities related to hazardous waste management.
- (4) Responsible for production activities at the facility. Supervises staff that are hazardous waste generators.
- (5) Responsible for maintenance activities at the facility. Supervises staff that are hazardous waste generators and has some environmental management responsibilities.
- (6) Responsible for some hazardous waste management functions. Performs physical waste activities (e.g., moving and labeling containers, collecting samples, etc.)
- (7) Generates hazardous waste as part of production process. May utilize a satellite accumulation container.
- (8) Generates no hazardous waste and has no direct contact with physical hazardous waste activities as part of the production process.