Personnel Training
Where are the rules?

- Env-Hw 509.02(a)(2), which refers to:
  - 40 CFR 265.16

- Also, in the back of the chapter!
Who Must Be Trained?

- All employees with any hazardous waste related responsibilities; and

- Employees whose actions (or inactions) could result in non-compliance
  - Process operators
  - Emergency coordinators
  - Employees responsible for conducting inspections of HW storage areas
  - Employees responsible for handling HW containers (i.e., labeling, moving, shipping containers)
Who Can Conduct Training? YOU!

- Program must be directed by a person trained in hazardous waste management procedures
  - An outside HW management trainer or an in-house employee who has completed a HW management course (like this one!)
What Must Be Covered?

- HW management procedures relevant to the positions in which personnel are employed

- Contingency plan implementation
  - Ensure personnel are able to respond effectively to emergencies
    - How “involved” in response are your employees?
  - Everyone must know the evacuation alarm signal and procedure!!!
When is Training Required?

- Within 6 months of employment, or
- Within 6 months of assignment to a new hazardous waste position
- Must take part in **ANNUAL REVIEWS**
  - (annual recertification for HW coordinators)

*Employees must not work in unsupervised positions until training is completed*
FQG Satellite Storage

- Operator must be trained (at least) every 3 years if managing a satellite area is all they do.

If you move a satellite container to a 90-day area, you need ANNUAL training.
WRITTEN Personnel Training Plans

- FQGs – Must maintain a formal training program.
  - Program of classroom instruction or on-the-job training, and
  - Written documents and records.

- This issue is one of the most common violations currently seen in inspections!

WRITE A PLAN!
Training Plan Requirements

- **Job title** for HW-related positions
  - **NAME** of the employee filling each position;

- **Job description**
  - HW responsibilities
  - required skills, education;

- **Description of training**
  - type and amount of initial and continuing training to be given.
Prove the Training Happened!

- Records that document that the training or job experience has been completed, for example:
  - Certificates
  - Attendance sheets
  - Test papers

- Training records must be kept until closure of the facility; or for 3 years from the date an employee last worked there
Signing Manifests

- Hazardous waste coordinator certification is not required; but

- Must be trained to understand and properly complete the manifest
  - Training for wastes specific to your facility is advised
Summary:

- Make sure you have a written training plan
  - Job titles
    - Who fills those jobs
  - Job Description
    - What they do
    - What qualifications to do the job
  - Description of the training they will receive
    - What is it?
    - When will they get it?

- DOCUMENT that training is received!
- Update when staff change