

# 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



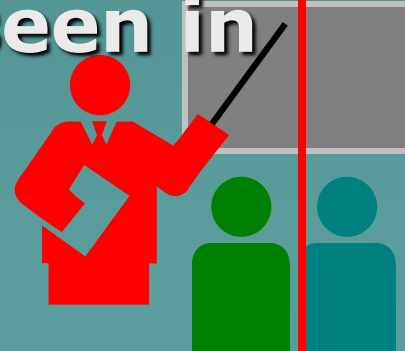
If you move a satellite container to a 90-day area, you need ANNUAL training

# 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**