

SAMPLE HAZARDOUS WASTE TRAINING PLAN

PERSONNEL TRAINING

The information provided in this section outlines the personnel-training program for the management of hazardous materials and hazardous waste at My Manufacturing facility. The purpose of this training program is to familiarize employees with the environmental regulations, recordkeeping, and waste management and emergency response procedures necessary for a particular job, so they can perform their jobs in the safest and most efficient manner possible. The training program has been developed to satisfy the training requirements specified in Env-Hw 509.02 and 40 CFR Part 265.16. This section provides an outline of the training program at the facility and a brief description of how the training program is designed to teach facility personnel appropriate procedures in the management of hazardous wastes, relevant to their positions at the facility.

For the purposes of this Training Program, whenever the word Hazardous Waste is used, it shall also include Hazardous Materials, such as those chemicals in use at the facility for manufacturing widgets.

Training Program Outline

At a minimum, a course which provides a basic level of training shall be given to all personnel who may be involved in hazardous waste management or handling of chemicals at the facility. The intent of the training shall be to train employees to comply with environmental regulations related to their job tasks and to address specific hazardous waste handling practices and procedures. The same outline is used for both introductory and annual training programs for all employees involved with hazardous waste management. An outline of the training course is as follows:

- A. Environmental Regulations – RCRA & OSHA
- B. Hazardous Waste Rules and Regulations – EPA & DES
- C. Emergency Response Procedures
 - (1) Integrated Contingency Plan – Implementation
 - (2) What Invokes?
 - (a) RCRA
 - (b) OSHA
 - (3) Incident Reporting
 - (a) Emergency Coordinator Responsibilities
 - (b) Employee Responsibilities

- (4) Hazardous Waste Properties and Hazards
- (5) Evacuation Plan
- (6) Emergency Equipment
- (7) Incident Response
 - (a) Minor Spills – Indoors/Outdoors
 - (b) Major Spills – Indoors/Outdoors
 - (c) Fires and Explosions

D. Summary and Review

For remaining employees at the facility who are not involved in hazardous wastes, there will be General Awareness training about the implementation of the Contingency Plan and the appropriate emergency response and evacuation procedures.

Initial and Annual Training

Employees involved in hazardous waste management are trained prior to starting, or soon after starting, depending on their actual responsibilities at the facility. All employees, who may come into contact with hazardous wastes at the facility, must complete the training with respect to their specific job within three months of their date of employment or transfer to a new position at the facility. All new personnel must not work unsupervised in their positions until the training requirements have been completed. The training consists of both classroom training and/or on-the-job training.

On an annual basis, employees must review the original training course and material related to updated regulations, specific wastes handled, and waste management practices and procedures incorporated into the processes. This continuing training provides the necessary update to satisfy annual training requirements.

Records

Records documenting job titles and descriptions relative to hazardous waste management at the facility, names of employees, and completed training programs must be kept at the facility in a permanent file. Training records for all former employees are kept for at least three years after employee termination. A record of completion of training should be awarded to each employee successfully completing the training course and annual course updates. The training records become a part of the employee's permanent personnel file.

Job Titles and Descriptions

General job descriptions for employees trained in hazardous waste management must be prepared and kept on-site in a permanent file. The specific job duties and responsibilities relative to hazardous waste management for each of the employees must be included in the description. The training records for all current facility personnel are maintained on file at the facility.

Employee Training

In accordance with Env-Hw 509.02(a)(2) which references 40 CFR Part 265.16(a), all employees are given training in hazardous waste management procedures relevant to their positions in which they are employed at the facility. Specifically:

- Employees have available to them, a chemical description and a MSDS for each of the chemicals that they are handling in the workplace. The information on these sheets is also important in case of a spill or a fire.
- Personnel are made aware of the hazards associated with each waste (i.e., ignitable) and taught proper responses to spills, fires, or accidents. All personnel are instructed on non-compatibility of materials; only appropriate personnel are instructed further on inspection procedures, required record keeping (waste tracking, manifests, inspections), required reports, manifesting, and labeling.
- The purpose of RCRA and the importance of maintaining compliance with RCRA regulations are reviewed as outlined in the training program outline.
- Emergency procedures and Contingency Plan implementation procedures specific to their positions are explained, as described in the training program outline.
- Emergency Response Training
 - In accordance with 40 CFR Part 265.16(a)(3), all employees are given training with respect to emergency procedures, emergency equipment, and emergency systems as these items pertain to their job at the facility. Where applicable to an individual's job, personnel are instructed in the classroom and/or on-the-job training in:
 - The Integrated Contingency Plan and emergency procedures as they pertain to their job;
 - Using, inspecting, repairing, and maintaining emergency and monitoring equipment;
 - Communication and alarm systems;
 - Responses to fires or explosions;
 - Responses to surface water and groundwater contamination incidents;
 - Use of Personal Protective Equipment (PPE);
 - Shutdown of operations; and
 - Evacuation Procedures.