

RCRA 101: Personnel Training

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Why?

- To reduce the potential for mistakes which might threaten human health or the environment
 - Ensure employees are thoroughly familiar with risks and responsibilities



Objectives of Training Requirements

- First concern was emergency response
 - Prepared for incidents to minimize impact
- Next, make all operators “experts” to reduce or eliminate incidents in the first place



Who is subject to these rules?

- VSQGs – No
- SQGs – Limited Requirements
 - 262.34(d)(iii)
 - 262.16(b)(9)(iii) – (moved w/ Generator Improvements)



Who is subject to these rules?

■ LQGs – Yes

- 262.34(a)(4) – (sends LQG to 265.16)
- 265.16
- 262.17(a)(7) – (Generator Improvements)

■ TDSFs – Yes

- 264.16 – Permitted TDSFs
- 265.16 – Interim Status TDSFs

Requirements for Small Quantity Generators

SQG

- Less strict, less defined standard
 - “Ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their job responsibilities during normal facility operations and emergencies”



SQG

- Less strict, less defined standard
 - “Employees who work in or adjacent to areas where hazardous wastes are generated, handled, or stored but do not handle hazardous wastes, must still be trained with basic emergency procedures. Part-time or temporary employees must also receive appropriate training.”

FR 51 10165 March 24, 1986

Requirements for LQGs & TSDFs

Outline of Requirements

- Who must be trained
- How they can be trained
- When they get trained
- What Documentation is required
 - Training Plan
 - What they are trained in
 - Proof that it happened

Who Must Be Trained?

Who Must Be Trained?

- All employees with any hazardous waste related responsibilities



Operators



Signs Manifest

Your Manifest Here



Inspects Storage Areas

Waste Handlers



Emergency Responders



Emergency Coordinator



Satellite Accumulation Areas



Training not required

“Personnel need to be familiar enough with the chemicals with which they are working to know when they have generated a hazardous waste so that it will be managed in accordance with the RCRA regulations”

How About?

- Tim works at a manufacturing facility as a clerk. One of his responsibilities is to distribute and file copies of the hazardous waste manifests after his supervisor signs them.
- Does Tim need hazardous waste training?
- Maybe.



Clerical

- *“Permit Applicants Guidance Manual for the General Permit Requirements” October 1983*
- Job titles for clerical and janitorial staff need not be recorded in a training records
- “Facility Personnel” - “All persons who work at, or oversee the operations of a hazardous waste facility, and whose actions or failure to act may result in non-compliance...”

How About?

- Tod does not handle hazardous waste, but his work station happens to be right next to a drum that is used to collect hazardous waste.
- Does Tod need hazardous waste training?
- Yes, he must be familiar with emergency procedures, even if that is only notifying a responsible party

Contractors

- All facility personnel involved with hazardous waste must be trained
 - They are covered under def. of “facility personnel”
 - Faxback 14180
- Handlers of hazardous waste, or those whose actions (or inactions) could impact compliance

How They Can be Trained

Who Can Conduct Training?

- Program must be directed by a person trained in hazardous waste management procedures



Government Agency



Private Contractor



Site Staff

Formal “outside” program

- Private vendor or government
- Best for supervisors only?
- Broader in scope – not specific to site job functions



“In-house”

- Classroom formal ed. performed by contractor or informal classroom ed. performed by facility staff



“OJT”

- Training provider should be skilled in current methods of facility operations
 - Supervisors?



Generator Improvements

- Clarified that “online” or computer-based training is an acceptable training method



When is Training Required?

- **Must take part in ANNUAL REVIEWS after initial training**



Issues

- What does "Annual" mean?
 - RO 14286, Cotsworth



But I'm only an LQG once every 4 years. Do I have to train annually?

- No. You would be responsible for the LQG training requirements during those months when you are a LQG, but not in the interim.

- Faxback 12245

When is Training Required?

- **Within 6 months of employment, or**
- **Within 6 months of assignment to a new position**
- **Employees must not work in unsupervised positions until training is completed**



What Documentation is
Required?

Documents for a Training Program

- A Training Plan
- Training materials used
- Proof that training was completed when required, and that standards were met



Training Plan- “What the Facility is Going to Do”

- Written “instructions” for training program
 - Who, ,Why, What, and When
- Accessible at time of inspection
 - Digital OK
 - Off-site digital?



Content of the Training “Plan”

MUST have this

- **Job title for HW-related positions**
 - **NAME of the employee(s) filling each position (this can be a reference to a list);**
- **Job Description (Hazardous Waste)**
 - **Qualifications for job (if any)**
- **Outline of Training Provided**
 - **Type**
 - **Amount**





In a Perfect World...

Job Titles

Names of Individuals Filling that Role

A Note on Job Titles

- Job Titles do NOT need to be the same as what Human Resources assigns
- A “Painter” can be a “HW Handler”
- A “Maintenance Tech” can be a “HW Handler”
- A “Production Supervisor” can be a “HW Handler”

JOB TITLE	EMPLOYEE
Emergency Coordinator(s) <ul style="list-style-type: none">• Facilities Manager• General Manager	<ul style="list-style-type: none">• Crystal Ball- Facilities Manager• Dodge Ball- General Manager
Hazardous Waste Coordinator(s) <ul style="list-style-type: none">• EH&S Manager	<ul style="list-style-type: none">• Sandy Beach
Hazardous Waste Handlers <ul style="list-style-type: none">• Facilities Dept. Staff• EH&S Dept. Staff	<ul style="list-style-type: none">• John Doe- Facilities• Jane Doe- EH&S• Rocky Beach- EH&S

Description of HW Responsibilities

Qualifications to Fill Role

JOB TITLE	EMPLOYEE	JOB DESCRIPTION/RESPONSIBILITIES	MINIMUM QUALIFICATIONS/EDUCATION
Emergency Coordinator(s) <ul style="list-style-type: none"> • Facilities Manager • General Manager 	<ul style="list-style-type: none"> • Crystal Ball- Facilities Manager • Dodge Ball- General Manager 	<ul style="list-style-type: none"> • Implement the contingency plan • Familiar with all aspects of the facility • Activate Facility Alarms • Notifications • Assess Hazardous • Manage hazardous waste generated from the emergency • Prepare and submit required reports • Ensure all emergency equipment is decontaminated and cleaned 	<ul style="list-style-type: none"> • Bachelor's Degree • Employment with company for a minimum of 1 year • Familiar with all processes and hazardous waste generated at the facility • OSHA <u>Hazwoper</u> Certification
Hazardous Waste Coordinator(s) <ul style="list-style-type: none"> • EH&S Manager 	<ul style="list-style-type: none"> • Sandy Beach 	<ul style="list-style-type: none"> • Inspections of Central Accumulation Area (CAA) • Maintaining hazardous waste training program • Hazardous waste determinations • Signing manifests • Conducting hazardous waste training • Ensure hazardous waste is shipped off-site within 90 days • Hazardous Waste Record Keeping (Training, manifests, quarterly reports, inspections logs...) 	<ul style="list-style-type: none"> • Bachelor's Degree • Familiar with all processes and hazardous waste generated at the facility • NHDES Hazardous Waste Coordinator Certification • OSHA <u>Hazwoper</u> Certification
Hazardous Waste Handlers <ul style="list-style-type: none"> • Facilities Dept. Staff • EH&S Dept. Staff 	<ul style="list-style-type: none"> • John Doe- Facilities • Jane Doe- EH&S • Rocky Beach- EH&S 	<ul style="list-style-type: none"> • Manage hazardous waste in the CAA • Inspections of CAA • Manage small spills of hazardous waste • Container marking • Moving containers of hazardous waste from Satellite Accumulation Area • Manage used oil for recycle • Consolidate hazardous waste • Prepares hazardous waste containers for shipment • Inspects Satellite Accumulation Areas (>10-gallons) 	<ul style="list-style-type: none"> • High School Diploma or equivalent • Lift a minimum of 10 pounds • Organized

Description of HW Training Provided

Who Takes What Training

Training Provided

Who it's for

When they get it

COURSE	TOPICS COVERED	REQUIRED ATTENDEES	FREQUENCY
Contingency Plan & Emergency Response	<ul style="list-style-type: none"> • Contingency plan • Evacuation & Communication • Medical Emergencies • Emergency Response Procedures 	<ul style="list-style-type: none"> • All employees 	<ul style="list-style-type: none"> • Initial training within 6 months of employment; and • Annually
OSHA Hazardous Waste Operations	<ul style="list-style-type: none"> • Emergency Response Procedures • Response to a chemical Spill • Required PPE • Air Monitoring 	<ul style="list-style-type: none"> • Emergency Coordinators • Emergency Responders 	<ul style="list-style-type: none"> • Initial training within 6 months of employment; and • Annually
Hazardous Waste Awareness	<ul style="list-style-type: none"> • Spills • Container Marking/Management • Area Hazardous Waste Responsibilities • Incompatibilities • Specifics of types of hazardous waste at the facility • Universal Waste • Use Oil Management 	<ul style="list-style-type: none"> • Hazardous Waste Handlers • Satellite Handlers 	<ul style="list-style-type: none"> • Initial training within 6 months of employment; and • Handlers: Annually • Satellite Handlers: every three years
NHDES Hazardous Waste Coordinator	<ul style="list-style-type: none"> • Hazardous Waste Determinations • Training Program • Container Management • Used Oil • Contingency Plans • Universal Waste • Manifesting 	<ul style="list-style-type: none"> • Hazardous Waste Coordinator 	<ul style="list-style-type: none"> • Initial training within 6 months of employment; and • Annually

Extra Credit (but really good) -

Employee **HW** Start/End Dates

	Employee Name	Hazardous Waste Start Date	Hazardous Waste End Date
	Ball, Crystal	5/5/2016	Current
	Ball, Dodge	5/5/2016	Current
	Beach, Rocky	1/5/1998	Current
	Beach, Sandy	4/3/2000	Current
	Blue, Sky	10/25/1997	Current
	Cent, Millie	7/7/2007	4/9/2017
	Cloud, Rain	8/9/2010	Current
	Cutter, Stone	11/15/2003	Current
	Doe, Jane	9/6/2002	Current
	Doe, John	6/6/2006	Current
	Fish, Walter	7/12/2015	10/2/2015
	Leaf, Autumn	3/4/2005	Current
	Painter, Art	8/6/2012	6/6/2018
	Rain, Summer	12/8/2005	Current
	Rex, Tia	5/15/2015	8/9/2017
	Roll, Tootsie	3/3/2013	1/2/2018
	Short, Jean	4/4/2004	Current
	Sky, Gray	2/10/2007	5/31/2016
	Stress, Dee	9/5/2009	Current
	Topia, Tim	8/8/2008	Current
	Train, Cole	7/11/2011	Current

NH's Template for Recording Start Dates and Annual Training



Hazardous Waste Compliance Section
Hazardous Waste Generator Inspection Report

Inspector's Initials & Date: _____

HAZARDOUS WASTE TRAINING RECORDS MODULE

EPA Identification Number: NHD

DBA Name: _____

Inspection Date: _____

	Name	Title	HW Start Year	HW End Year	W/in 6 mos Y/N	2014	2015	2016	2017	2018	2019
1											
2											
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											
16											
17											
18											
19											
20											

Comments:

Coordination with Human Resources

- Communicate
 - Make HR aware of the HW requirements and make records accessible as necessary

Training Content

Contingency Plan Implementation

EVERYONE!



Evacuation Plan

-Run and run as fast as you can.
Just like you do during closing time.



To the extent involved



To what extent?

- Consider the extent they are responsible...
 - Communication and alarm systems
 - Using/inspecting emergency equipment
 - Shutting down waste generating systems
 - Use of PPE
 - Response to fires, explosions, releases
 - Containing spills
 - Informing local officials

Training Content for Emergency Response

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Communications or alarm systems
- Response to fires or explosions
- Response to groundwater contamination incidents
- Key parameters for automatic waste feed cut-off systems
- Shutdown of operations

Hazardous Waste Management Procedures

- Relevant to the positions in which personnel are employed
- Ideally:
 - One part will be about regulatory requirements
 - One part will be about the specific things they do in their jobs



Possible Content for Handlers

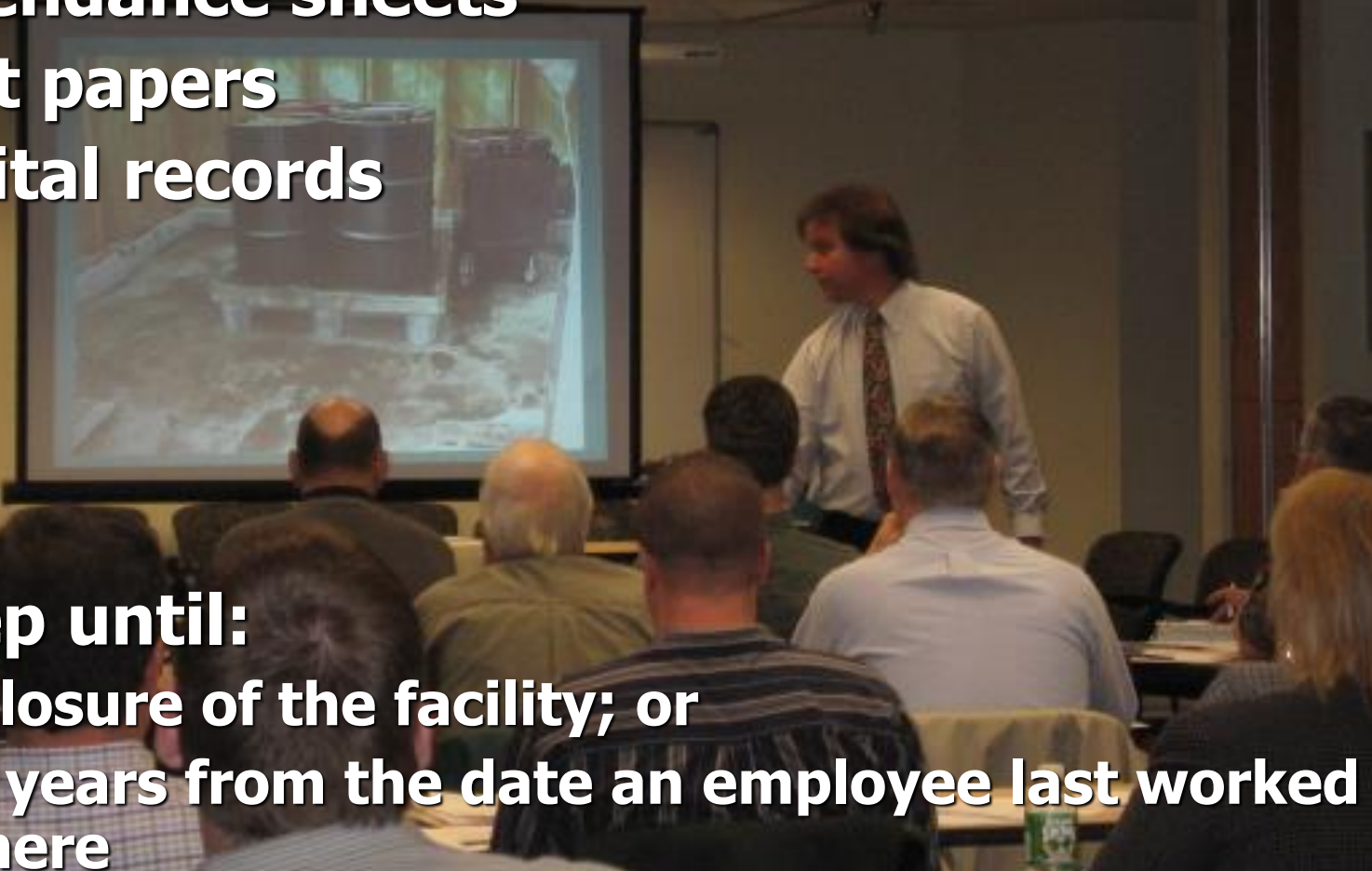
- Chemical characteristics of the wastes which they are assigned to manage
- Knowledge of what to do in the event of a spill or leak
- The types of protective equipment or clothing to be worn
- Proper operation of trucks, forklifts, or any other machinery to be used in waste disposal
- Knowledge of basic first aid
- Who to inform in the event of an emergency

Tell me why, not just how!

- Trainees need to buy in, and understand that there really is a reason
 - The more of an explanation you can give, the more they'll accept it
 - Less likely to take short-cuts



Proof the Training Happened!

- **Certificates**
 - **Attendance sheets**
 - **Test papers**
 - **Digital records**
- 
- **Keep until:**
 - **closure of the facility; or**
 - **3 years from the date an employee last worked there**

Training for Universal Waste

- 60 FR 25528
- LQH same language in rule as for SQGs (273.36)
 - Thoroughly familiar with proper waste handling and emergency procedures
- SQH “inform” (273.16)
 - Brochures, documents
- Annual reviews not required
- Documentation not required



Resources

- FR 45 33182 – May 19, 1980
- FR 48 118 – January 3, 1983
- FR 81 85732 - November 28, 2016
- RO 12341 RO 14286
- RO 14598 RO 14703

- OSWER Directive 9523.00-10
 - *"Permit Applicants Guidance Manual for the General Permit Requirements"* – October, 1983



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