



Section 262.34(d)(5)(iii) of the Colorado Hazardous Waste Regulations 6 CCR 1007-3 requires hazardous waste training. Hazardous waste training is necessary to educate employees about the proper handling and management of hazardous waste and emergency response procedures. The type of training provided depends on the employee's job responsibilities. Additionally, small quantity generators (SQGs) are required to document and maintain employee training records.

Training Components

Facility personnel involved in the management of hazardous waste or the documentation of hazardous waste activities must have training that 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. In general, any employee that generates hazardous waste, places it in containers, works around the area where hazardous waste is generated or stored, conducts weekly inspections, acts as the emergency coordinator, signs hazardous waste shipping manifests, and/or is involved with hazardous waste recordkeeping should receive training. Although small quantity generators don't typically have employees in all of the categories listed, you may find Table 1 at the end of this guidance document helpful in determining what training may be appropriate for personnel at your facility.

Your training program should contain basic hazardous waste management procedures for select individuals as necessary. Examples of topics that should be included in the hazardous waste training program include:

- Hazardous waste identification and determination.
- "Cradle-to-grave" responsibility (i.e., from the moment it is generated at your facility until its ultimate disposal).
- Hazardous waste manifest requirements.
- Land disposal restriction (LDR) forms.
- Proper labeling of hazardous waste containers and tanks.
- "Used Oil" labeling.
- Hazardous waste accumulation areas and time limits (180/270 day, satellite).
- Container and tank management.
- Hazardous waste compatibility.
- Record keeping.
- Spill clean up.
- Emergency response procedures.
- Aisle space.
- Emergency coordinator contact information.
- Emergency coordinator phone postings.
- Arrangements with local emergency response authorities (e.g. fire department, police department, local health department, local hospitals and emergency response teams).

Emergency Response Training

All facility personnel, despite their position, should have emergency response training so they can respond effectively in an emergency involving hazardous waste. 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, using fire fighting equipment, etc. All employees should be trained to know who the emergency contact is, when to contact them, and how to contact them in an emergency.

OSHA Training

Many facilities also have to comply with the Occupational Safety and Health Administration's (OSHA) training requirements (e.g., HAZWOPER, hazardous communication, personal protective equipment, etc.). Although various aspects of OSHA training may overlap with hazardous waste training concepts, OSHA training alone typically does not meet all of the necessary requirements for hazardous waste training.

Record Keeping

Documentation of employee training is required. It is suggested that a written training plan be developed and a roster of employee names, dates of training and employee signatures documenting completion of training be kept on file to prove compliance with the training requirements. The facility must maintain employee training records onsite for all current employees.

An example of a general training roster that includes various hazardous waste training topics is included in Table 2. This training roster can be modified to reflect the type of hazardous waste training provided to your employees.

Performance-based

Training requirements are performance-based. Therefore, employees must be adequately trained in hazardous waste job activities to ensure compliance with applicable hazardous waste regulations. Failure to demonstrate this type of training could result in non-compliance with the training requirements. For example, during a hazardous waste compliance inspection, your facility could be cited for non-compliance with the hazardous waste training requirements if multiple waste management violations are observed even though facility records indicate that employees have been trained in these areas.

Hazardous waste training for a small quantity generator is only required to be a one-time activity for each employee. However, the Hazardous Materials and Waste Management Division strongly recommends an annual refresher class to ensure that all facility personnel are aware of their responsibilities as they relate to management of hazardous waste and emergency response.

For more information please contact:

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This is designed to provide guidance on the appropriate management of wastes based on Colorado solid and hazardous waste statutes and regulations only. Other statutes and regulations may also apply.

TABLE 1

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

TRAINING ELEMENT	GENERIC JOB CATEGORY							
	Environmental Manager (1)	Recordkeeper (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
Record keeping	Y	Y				Y		
Accumulation (satellite / 180 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)	Recordkeeper (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.

