

Training Requirements and Records: Generators, Collection Sites and TSD Facilities

Guidance on Hazardous Waste Requirements



Introduction

Training employees to safely handle hazardous waste is the most effective and economical way to ensure proper waste management while protecting human health and the environment. Training requirements for the management of hazardous waste, universal waste, and used oil are outlined in the NR 600 series of the Wisconsin Administrative Code and will vary based on the amount and types of wastes generated at your facility.

Hazardous waste regulations are found in chapters [NR 600-679](#) of the Wisconsin Administrative Code.

The training requirements cover hazardous waste management, safety and emergency response and must be specific to the employee's job function. Providing employees with thorough explanations of why certain operations are performed can reduce the use of short-cut procedures that may be dangerous to plant personnel or the surrounding population.

This guidance document outlines the regulatory training requirements for the following facility types:

- Large Quantity Hazardous Waste Generators (LQGs) [NR 662.017 (1) (g)]
- Treatment, Storage and Disposal Facilities (TSDFs) [NR 664 and NR665.0016]
- Small Quantity Hazardous Waste Generators (SQGs) [NR 662.016 (2) (i) 3]
- Hazardous Waste Collection Sites [NR 666.903 (11)]
- Universal Waste Handlers [NR 673.16 and NR 673.36]

Various instructional methods can be used to meet hazardous waste training requirements, such as classes, demonstrations, online training or on-the-job instruction. It is important that your training program teach both proper hazardous waste management and emergency response procedures relevant to the position and duties of each employee.

All facility personnel, including office staff and on-site contractors, must be trained on emergency procedures. Based on the type of hazardous waste management and the facility's generator status, this could include training on facility-specific contingency plans and evacuation procedures.

Training Program Elements

Training programs must teach hazardous waste management procedures relevant to the position and duties of the employee. Ideally, your training program would represent "real world" scenarios and site-specific hazardous waste management activities which instruct employees how to:

- Identify the chemical and physical characteristics of the waste streams employees are assigned to manage and recognize incompatibilities with other wastes and materials
- Document and maintain required records
- Characterize hazardous wastes
- Identify appropriate waste containers for storing and shipping
- Label and mark containers during storage and for shipment
- Inspect waste-storage areas (if applicable)
- Utilize manifests (if applicable)
- Protect employees from hazardous waste
- Respond to hazardous waste emergencies and spills and whom to inform if an emergency occurs

Training may be acquired through a combination of in-house, on-the-job or formal training programs.

The facility owner/operator is responsible for determining which training methods are the most effective in ensuring hazardous waste training requirements are met. One option is to send supervisory personnel to formal off-site training programs to acquire the appropriate training skills, and then have these trained personnel conduct facility-focused, on-the-job training sessions for employees.

On-the-job or in-house training programs allow more flexibility and can be designed to closely fit individual job positions and hazardous waste management duties. Formal training programs are typically more general and might not cover the various job positions in the level of detail required by regulations.

Various instructional methods such as classes, demonstrations, online training or on-the-job instruction can meet the state’s hazardous waste training requirements. It is important your training program cover waste-handling and emergency procedures **specific to the position and role of the employee.**

Example Training Record:

Small Business Inc.		
EPA #WID 123456789		
HAZARDOUS WASTE PERSONNEL TRAINING RECORD		
Employee Name:	Maria Maintenance	
Employee Starting Date:	4/12/2015	
Job Title:	Maintenance Supervisor	
Job Description:	Oversee maintenance staff, participate with plant safety committee	
Training Topics	Date/Instructor	
Contingency Plan Familiarization	05/03/2015	S. Supervisor
Empties, Leaks & Emergency Response	05/03/2015	T. Trainer
Labeling, Marking & Placarding	05/03/2015	T. Trainer
Shipping papers/Manifests	05/03/2015	T. Trainer
Waste Handling:		
Collection	05/04/2016	T. Trainer
Segregation	05/04/2016	T. Trainer
Accumulation	05/04/2016	T. Trainer
Required Annual Review		
Waste Handling review	04/15/2016	S. Supervisor
Contingency plan	04/15/2016	S. Supervisor
New regulations	04/15/2016	S. Supervisor

An example training record or log is attached to this publication. This specific form is not required as generators may create their own form or record-keeping system to meet the needs of their individual facilities.

Large Quantity Generators and TSD Facilities

LQG and TSD facility training requirements: LQG facilities may accumulate hazardous waste on-site for 90 days or less without an operating license provided certain conditions are met. These conditions require LQG facilities to comply with the personnel training requirements of s. NR 662.017 (g), Wis. Adm. Code.

TSD facilities comply with the personnel training requirements of ss. NR 664.0016 and 665.0016, Wis. Adm. Code.

All facility personnel, regardless of their position, must be familiar with the facility's contingency plan and be able to respond effectively in an emergency. Facility personnel include contractors, contract employees and office staff. The emergency coordinator must receive additional training specific to the facility contingency plan which outlines their responsibilities in the event of fire, explosion or discharge of hazardous waste.

Facility personnel must successfully complete a program of classroom instruction or on-the-job training teaching them to perform their duties and ensuring the facility's compliance with the requirements.

- The training program must be directed by a person trained in hazardous waste management procedures.
- It must include position-specific hazardous waste management procedures and training, including contingency plan implementation.
- Employees may not work unsupervised until they have completed the training requirements specific to their job position.
- Employees must complete the training program within six months of their employment or assignment to the specific job position.
- Facility employees must take part in an annual review of their initial training.

Contractors working at TSD or LQG facilities are held to the same standards as non-contract facility personnel.

Emergencies: At a minimum, the training program must be designed to ensure facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems, including (where applicable):

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

Position-Specific Hazardous Waste Management: Employees are required to have training specific to their job description and duties. Recommended training elements for employees in charge of managing hazardous wastes include:

- The chemical characteristics of the wastes which they are assigned to manage (e.g., reactivity or incompatible waste types)
- Making a waste determination for both hazardous and non-hazardous waste streams
- Knowledge of procedures 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
- ☐ Whom to inform in the event of an emergency

Recordkeeping and Documentation: The owner or operator must ensure the training program includes identifying what documents and records must be maintained at the facility, such as:

- ☐ Written descriptions of the type and amount of both introductory and continued training conducted for each employee, including identifying the employee's name, title and job duties related to hazardous waste management.
- ☐ Written job descriptions for each position related to hazardous waste management, which include requisite skill, education or other qualifications for the position and all duties of employees assigned to this position.
- ☐ Records that document the completed training for facility personnel based on job-specific duties and training requirements.
- ☐ Training records for employees must be kept for at least 3 years from the date the employee last worked at the facility, as specified in ss. NR 662.017 (1) (g) 5, NR 664.0016 (5) and NR 665.0016(5), Wis. Adm. Code.

During the TSD licensing process the facility must submit the proposed training program, which must include descriptions designed to meet specific job tasks.

Small Quantity Generators

SQG training requirements: SQG facilities may accumulate hazardous waste on-site for 180 days or less (or 270 days if shipping a distance greater than 200 miles) without an operating license provided the SQG specific conditions are met. These conditions include compliance with the following training requirements.

SQG emergency procedures and personnel training requirements, as outlined in s. NR 662.016 (2) (i), Wis. Adm. Code, must include the following elements:

- ☐ At least one employee, typically the emergency coordinator, must be either on premises or on call and available to respond to an emergency by reaching the facility within a short period of time.
- ☐ The following information must be posted next to the telephone: Name and telephone number of the emergency coordinator, location of the fire extinguishers and spill control materials (and fire alarm, if present), and the telephone number of the fire department, unless the facility has a direct alarm.
- ☐ The facility must ensure all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities, during normal facility operations.

An **SQG** generates more than 220 pounds but less than 2,205 pounds of non-acute hazardous waste in any month. An SQG also may not generate or store more than 2.2 pounds of acute hazardous waste (P-listed) in any month.

Permanent collection facilities: Owners and operators of permanent Household Hazardous Waste and Very Small Quantity Generator hazardous waste collection facilities are required to train all facility personnel, either by classroom instruction or on the job training, related to their job duties to ensure they are able to respond effectively to emergencies. [NR 666.903 (11)]

A permanent collection facility is where HHW or VSQG waste, or both, is collected or stored for **more than 5** consecutive days.

Training program requirements:

- The training must familiarize employees with emergency equipment and procedures.
- Employees shall not work unsupervised until their initial training is completed.
- All initial training must be completed within six months of employment.
- The training must be reviewed annually for all employees.

Temporary collection sites: Owners and operators of temporary collection facilities must ensure all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their job responsibilities. [NR 666.904(6)]

A temporary collection facility is where HHW, or VSQG waste, or both, is collected or stored for **no more than 5** consecutive days.

Universal Waste Handlers

Small quantity handlers of universal waste must inform employees on how to properly handle all universal waste generated at the facility and what emergency procedures apply to the specific universal waste types. [NR 673.16]

A small quantity UW handler accumulates less than 5,000 kilograms (11,025 pounds) of universal waste (batteries, pesticides, lamps, or mercury-containing devices such as thermostats, counted collectively) at any time.

Large quantity handlers of universal waste must ensure employees are thoroughly familiar with proper waste handling and emergency procedures, relative to the universal waste types generated at the facility. [NR 673.36]

Training elements to consider include:

- Types of universal wastes are generated at the facility.
- Labeling and marking requirements for wastes.
- Container requirements (e.g., closed, structurally sound, compatible).
- How to respond to accidental releases of broken or damaged universal waste or its contents, determine if spill residuals are hazardous waste, determine appropriate PPE and cleanup procedures and any emergency procedures associated with the spill.
- Why the disposal or treatment of universal waste is not allowed except as provided for in the regulations.
- How to segregate universal waste in distinct areas/containers.
- How to ensure universal waste is accumulated for no longer than one year.

A large quantity UW handler accumulates 5,000 kilograms or more at any time. [NR 673.06 (6)]

Additional Training Requirements & Recommendations

Packaging of hazardous waste for shipment: The U.S. Department of Transportation Hazardous Materials Regulations require employees who package hazardous materials for transport, including hazardous wastes, to receive documented training specifically addressing these duties.

Businesses using hazardous waste manifests, including VSQGs that use manifests, are required to train all employees who prepare the waste for shipment and who handle shipping documents. Additionally, any person signing the offeror's certification statement on the uniform hazardous waste manifest is required to be trained. DOT's Hazardous Material Regulations are located in 49 CFR Part 172, Subpart H.

Employee health and safety: The Occupational Safety and Health Administration requires employees be trained in Hazardous Waste Operations and Emergency Response (HAZWOPER; 29 CFR § 1910.120), with annual refresher courses, for any employees designated to respond to hazardous waste incidents and spills. While the Hazard Communication Standard Regulations (HCS; 29 CFR § 1910.1200) administered by OSHA do not apply directly to hazardous wastes, the regulations do require training of employees who work with certain chemicals, some of which may become hazardous wastes.

Additionally, HAZWOPER regulations require specific hazardous waste spill response training for certain employees at hazardous waste remediation sites and permitted hazardous waste TSD facilities.

Employees designated within a hazardous waste spill response plan as responders, including VSQG sites, will require this training.

Annual refresher training: The purpose of the annual refresher training or review is to ensure facility personnel maintain their expertise. Facility personnel require annual training each year, ideally on or near the anniversary date of their initial training; however, if training occurs at least once every calendar year the annual training requirement is met.

Program instructors: It is recommended that instructors, especially those conducting formal training sessions, be experts in the field of hazardous waste management in order to adequately address questions. For performance-type training programs (e.g., on-the-job training), it is recommended the instructor be a supervisor who is skilled in the current methods of facility operation.

It is the responsibility of the owner or operator to define the scope of their site-specific training programs in order to ensure personnel acquire the necessary knowledge and skills to both perform their jobs and protect human health and the environment. Documentation of the training program should demonstrate the program satisfies the regulatory requirements outlined in this guidance document.

Resources and Contact Information

For more information including [publications, inspection forms, and administrative codes and statutes](#), go to dnr.wi.gov and search "hazardous waste resources." Use the *Additional Resources* menu to navigate to specific topics. For staff contact information, go to the [staff directory](#), and enter "hazardous waste requirements" in the subject field, and choose the appropriate county contact.

Mailing address: DNR Waste & Materials Management Program, PO Box 7921, Madison, WI 53707

Email: DNRWasteMaterials@Wisconsin.gov

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***Disclaimer:** This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.*

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EXAMPLE HAZARDOUS WASTE TRAINING RECORD

YOUR LOGO
HERE

[Company Name]

RCRA Hazardous Waste Management – Training Record

EMPLOYEE INFORMATION

Name:		Start date:	
Job title and description:		Supervisor:	

FIRST DAY

- Provide employee with Emergency Response Training/Evacuation Procedures.
- Assign "buddy" employee(s) to provide oversight on hazardous waste management questions/training.

HAZARDOUS WASTE DUTIES

<input type="checkbox"/> List all daily, weekly, monthly, or annual duties related to hazardous waste management	Examples: <ul style="list-style-type: none"> Supervise ...Review ...Implement ...Conduct ...Attend...
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HAZARDOUS WASTE TRAINING REQUIREMENTS

<input type="checkbox"/> Identify appropriate training based on the employee's job position and duties	Examples: <ul style="list-style-type: none"> How to document and maintain records How to characterize hazardous waste How to identify facility waste containers for storing and shipping How to label and mark containers for storage and shipment 	<ul style="list-style-type: none"> Inspection requirements for waste storage areas Manifest training / record-keeping Proper handling and PPE How to respond to hazardous waste emergencies and spills
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HAZARDOUS WASTE TRAINING LOG - Examples

<input type="checkbox"/> Initial training	<u>Course - Examples</u> <ul style="list-style-type: none"> Emergency Response HW Management/PPE Storage Requirements Etc. 	<u>Date Due</u>	<u>Date Conducted</u>	<u>Instructor</u>
<input type="checkbox"/> Annual refresher training (or additional follow-up training, advanced sessions, etc.)	<u>Course Title</u>	<u>Date Due</u>	<u>Date Conducted</u>	<u>Instructor</u>

SKILLS, EXPERIENCE, EDUCATION

<input type="checkbox"/> List appropriate information pertaining to hazardous waste management skills and education	Example – Initial OSHA 40-Hour Hazwoper date/location	Example – Years of experience at XYZ company/title	
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This specific form is not required. Generators may create their own form or recordkeeping system to meet the needs of their individual facilities.