

# Training Requirements and Records: Hazardous Waste Generators, Collection Sites and TSD Facilities



PUB-WA-099 2017

## Introduction

Training employees to safely handle hazardous waste is the most effective and economic way to ensure proper waste management while protecting human and environmental health. The training requirements cover 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.

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

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.

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

- Large Quantity Hazardous Waste Generators (LQG)
- Treatment, Storage and Disposal facilities (TSD)
- Small Quantity Hazardous Waste Generators (SQG)
- Hazardous Waste Collection Sites
- Universal Waste Handlers

*A universal waste (UW) handler generates, receives or accumulates UW prior to sending it to a destination facility.*

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

## 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 on how to:

- 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

Small Business Inc. EPA #WID 123456789 HAZARDOUS WASTE PERSONNEL TRAINING RECORD		
Employee Name:	Marla 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
<b>Waste Handling:</b>		
Collection	05/04/2016	T. Trainer
Segregation	05/04/2016	T. Trainer
Accumulation	05/04/2016	T. Trainer
<b>Required Annual Review</b>		
Waste Handling review	04/15/2016	S. Supervisor
Contingency plan	04/15/2016	S. Supervisor
New regulations	04/15/2016	S. Supervisor

- Utilize manifests
- Protect employees from hazardous waste
- Respond to hazardous waste emergencies and spills

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 will be the most effective in ensuring that the hazardous waste training requirements are met. One option could be 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.

On-the-job or in-house training programs can allow for more flexibility as they 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 that is required by regulations.

**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.

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 recordkeeping system to meet the needs of their individual facilities.

## Large Quantity Generators and TSD Facilities

**LQG and TSD facility training requirements:** LQG facilities are allowed to accumulate hazardous waste on-site for 90 days or less without an operating license provided that certain conditions are met. These conditions require the LQG generator to comply with the personnel training requirements of s. NR 665.0016, and the TSD facility to comply with the personnel training requirements of s. NR 664.0016.

**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 shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements.

- The training program shall be directed by a person trained in hazardous waste management procedures.
- It shall 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.

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

- Facility employees shall take part in an annual review of their initial training.

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

- 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

Additionally, further training elements might be required for employees who are in charge of managing wastes. Examples include, but are not limited to:

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

The owner or operator shall ensure that this training program includes maintaining documents and records at the facility such as keeping:

- Written descriptions of the type and amount of both introductory and continued training that will be given to each person filling specific job positions (titles) related to hazardous waste management, along with the name of employees filling each job.
- 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 per chapters NR 664.0016 (5) and NR 665.0016 (5).

**Note:** During the TSD licensing process the facility must submit, along with their feasibility and plan of operation report (FPOR), the proposed training program which must include description designed to meet specific job tasks.

## Small Quantity Generators

**SQG training requirements:** SQG facilities are allowed to accumulate hazardous waste on-site for 180 days or less without an operating license provided the SQG specific conditions are met. These conditions include compliance with the following training requirements.

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.

SQG emergency procedures and personnel training requirements, as outlined in NR 662.192(1)(e) must include the following elements:

- At least one employee (typically the emergency coordinator) must be either on premises or on call (i.e. 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 that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities, during normal facility operations.

## Hazardous Waste Collection Sites

**Permanent collection facilities:** Owners and operators of permanent Household Hazardous Waste (HHW) and Very Small Quantity Generator (VSQG) 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]

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 in unsupervised positions until the 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 that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their job responsibilities. [NR 666.904]

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 lbs)** 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 that employees are thoroughly familiar with proper waste handling and emergency procedures, relative to the universal waste types

A large quantity UW handler accumulates **5,000 kilograms or more**.

generated at the facility. [NR 673.36]

Training elements to consider include:

- What types of universal wastes are generated at the facility.
- Labeling and marking requirements.
- Container requirements (e.g., closed, structurally sound, compatible).
- How to respond to 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 that universal waste is accumulated for no longer than one year.

## Additional Training Requirements & Recommendations

**Packaging of Hazardous Waste for Shipment:** The U.S. Department of Transportation (DOT) Hazardous Materials Regulations require employees who package hazardous materials for transport, including hazardous wastes, to receive documented training that specifically addresses these duties. Businesses that use hazardous waste manifests, including **when a VSQG manifests their wastes**, 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 & Safety:** The Occupational Safety and Health Administration (OSHA) requires that employees be trained in HAZWOPER (Hazardous Waste Operations and Emergency Response; s. 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; s. 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.

While some facility types discussed previously within this document require recordkeeping and documentation of specific training activities based on Wisconsin Administrative Code requirements, recordkeeping is always recommended for all facility types and may be required by other agencies such as OSHA or the DOT.

**Annual refresher training:** The purpose of the annual refresher training or review is to ensure that facility personnel maintain their expertise. It is required that facility personnel are trained each year, ideally no later than the anniversary date of their initial training.

**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 that the instructor be a supervisor who is skilled in the current methods of facility operation.

It is the responsibility of the facility to define the scope of their site-specific training programs in order to ensure that personnel acquire the necessary knowledge and skills to both perform their jobs and to

protect human health and the environment. Documentation of the training program should demonstrate that the program satisfies the regulatory requirements outlined in this guidance document.

## Resources and DNR Contact Information

For more information on this subject, including other publications, staff contacts and administrative codes and statutes, search by topic and WA publications at [dnr.wi.gov](http://dnr.wi.gov), contact Waste & Materials Management staff by searching [Hazardous Waste Staff](#) at [dnr.wi.gov](http://dnr.wi.gov), or see map below.

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

**Email:** [DNRWasteMaterials@Wisconsin.gov](mailto:DNRWasteMaterials@Wisconsin.gov)

***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:	
Position:		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	<p>Examples:</p> <ul style="list-style-type: none"> <li>Supervise ...Review ...Implement ...Conduct ...Attend...</li> </ul>
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### HAZARDOUS WASTE TRAINING REQUIREMENTS

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

<input type="checkbox"/> Initial training	<p><u>Course - Examples</u></p> <ul style="list-style-type: none"> <li>Emergency Response</li> <li>HW Management/PPE</li> <li>Storage Requirements</li> <li>Etc.</li> </ul>	<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.*



## WISCONSIN DEPARTMENT OF NATURAL RESOURCES NOTICE OF FINAL GUIDANCE & CERTIFICATION

Pursuant to ch. 227, Wis. Stats., the Wisconsin Department of Natural Resources has finalized and hereby certifies the following guidance document.

### DOCUMENT ID

WA-19-0099-C

### DOCUMENT TITLE

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

### PROGRAM/BUREAU

Waste and Materials Management

### STATUTORY AUTHORITY OR LEGAL CITATION

Ch. 291, Wis. Stats.; Chs. NR 600-679, Wis. Adm. Code

### DATE SENT TO LEGISLATIVE REFERENCE BUREAU (FOR PUBLIC COMMENTS)

September 16, 2019

### DATE FINALIZED

October 8, 2019

### DNR CERTIFICATION

*I have reviewed this guidance document or proposed guidance document and I certify that it complies with sections 227.10 and 227.11 of the Wisconsin Statutes. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is not explicitly required or explicitly permitted by a statute or a rule that has been lawfully promulgated. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is more restrictive than a standard, requirement, or threshold contained in the Wisconsin Statutes.*

A handwritten signature in black ink, appearing to read 'Joseph P. Van Rossum', is written over a horizontal line.

October 8, 2019

Signature

Date