



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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Environmental Program Fact Sheet

HAZARDOUS WASTE PERSONNEL TRAINING

Purpose

This fact sheet is designed to answer general questions and provide basic information on hazardous waste personnel training, and is not intended to supersede the applicable regulations. The information provided below addresses the requirements applicable only to large quantity generators (LQG). The hazardous waste personnel training requirements are found in Section 22a-449(c)-102(a)(1) of the Regulations of Connecticut State Agencies ("RCSA"), incorporating 40 CFR 262.34(a)(4) and 265.16. It is your responsibility to comply with all applicable laws and regulations.

What Is Hazardous Waste Personnel Training?

The hazardous waste personnel training program must be designed to ensure that facility personnel can respond effectively to emergencies by familiarizing them with emergency procedures, equipment and systems. In addition, the program must teach personnel the hazardous waste management procedures relevant to their positions and duties, unless those persons are under the direct supervision of someone who is responsible for ensuring that their duties are performed in compliance with these regulations. At a minimum, the program must include the following emergency response elements:

- A) procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment;
- B) key parameters for automatic waste feed cut-off systems;
- C) communications and/or alarm systems;
- D) response to fires, explosions and releases of hazardous waste constituents;
- E) response to groundwater contamination incidents;
- F) shutdown of operations; and
- G) evacuation procedures.

Who Should Be Trained?

Any facility personnel who perform hazardous waste-related activities, and/or are responsible for ensuring that the facility's waste management procedures comply with all applicable regulations should be trained. The regulations are flexible and allow for different approaches to personnel training, depending upon each facility's specific concerns. It is strongly recommended that all facility personnel become familiar with emergency evacuation procedures. In addition, an employee should be trained whenever he/she:

- A) is responsible for complying with applicable waste management regulations;
- B) responds to hazardous waste emergencies;
- C) makes decisions that impact waste handling or management procedures;
- D) is responsible for inspecting hazardous waste storage, treatment or disposal areas; or
- E) devises, fills out or signs waste management documents.

When Must Training Be Conducted?

Facility personnel must successfully complete the training program within six months after their date of hire, their assignment to a facility or their assignment to a new position within the facility. Employees must not work in unsupervised positions until they have completed these training requirements. In addition, facility personnel must take part in an annual review of the initial training program. This annual review should incorporate any changes in regulatory requirements or the facility's waste management or emergency procedures.

Can Training Be Combined with Other Personnel Training Programs?

Yes. One training program can be modified to incorporate and meet the requirements of another program. For example, a facility's Occupational Safety and Health ("OSHA") Hazardous Communication (29 CFR 1910.1200) training program can be modified to include all the required hazardous waste training elements. Training cannot, however, take the place of applicable regulatory training required by other authorities such as OSHA, the Department of Transportation ("DOT") or the National Fire Prevention Association ("NFPA").

Can Training Be Conducted In-House?

Yes. The owner or operator of a facility must ensure that the training program includes all the elements described in the regulations, and that it be directed by a person trained in hazardous waste management procedures. In many cases, facilities have one or more qualified employees who can conduct training in accordance with the regulations. Some facilities have had certified professionals conduct the initial training, then had the annual updates conducted by qualified in-

house staff. Training can also take many forms. For example, some elements may be covered via in-house safety meetings or by chemical and equipment suppliers.

How Must Personnel Training Be Documented?

Proper documentation is the only way for hazardous waste staff to verify that company personnel have received the hazardous waste training that they need. The owner or operator must maintain the following documents and records at the facility:

- A) the name and job title of each employee involved and trained in hazardous waste management;
- B) a written job description for each position listed above (item A). This description must include the requisite skill, education or other qualifications, and duties of facility personnel assigned to each position;
- C) a written description of the type and amount of both introductory and continuing training provided to facility personnel;
- D) records which document that the above-noted training has been provided to, and completed by, facility personnel. Such records may include, but are not limited to, trainee signature sheets and training certificates; and
- E) training records on current personnel which must be kept until closure of the facility. Training records of former employees must be kept for at least three years from the date the employee last worked at the facility.