

HAZARDOUS MATERIALS BUSINESS PLAN

III. EMPLOYEE TRAINING

The Employee Training program must take into consideration the type of work activity, and the level of responsibility of the employees subject to training. The training program should be reasonable and appropriate for the size of the business and the nature of the hazardous materials handled at this site. This training should include the following topics:

- 1) Procedures for safe handling of hazardous materials, including hazardous wastes
- 2) Procedures for communication and coordination with emergency response agencies
- 3) Use of Emergency Response Equipment
- 4) Emergency Response Plan implementation.

Instructions for completing the Employee Training Description

Complete all sections of the Employee Training Description. For each training topic complete the following training elements:

Persons Trained - List the job classifications or names of the persons that receive training in this topic.

Training Time - State the amount of time spent for this training. Indicate if different employees receive different amounts.

Refresher Frequency - State how often the training is repeated after the initial training (state law requires an annual refresher at a minimum)

Refresher Time - State the amount of time spent for the refresher training.

Training Content - Briefly describe the information covered in the training on this topic. If different information is covered for employees with different job duties, indicate this in your description.

Small Quantity Generator {Less than 1,000 kg (2,200 lb)/month}.

If a business generates hazardous waste, then the business owner/operator must ensure all employees are thoroughly familiar with proper waste handling and emergency procedures. Although the business owner/operator is not required to document or record training sessions related to hazardous waste management, written documentation with signatures of training is strongly recommended. For more information about the types of hazardous waste generators, please see full definition in the General Hazardous Waste Requirements publication HM-9097.

Large Quantity Generator {1,000 kg (2,200 lb)/month} or more.

If a business generates more than 1000 kg (2,200 lbs) of hazardous waste per month, the business owner/operator must have a hazardous waste training program. This program may include classroom training or on the job instructions.

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 systems. Furthermore, if applicable, the program shall include procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; key parameters for automatic waste feed cut-off systems; communications or alarm systems, response to fire or explosion; response to ground water contamination incidents; and shutdown of operations. The program must include job titles, job descriptions, and specific training for each position.

All employees must be trained within six months from the date of employment or assignment to facility or new position at a facility. The business owner/operator must conduct an annual “refresher” training session on hazardous waste management and emergency procedures. All training sessions must be documented and the training records must be kept on-site. These records will be reviewed during compliance inspections.

SAMPLE

HAZARDOUS MATERIALS BUSINESS PLAN

Date: MONTH-DAY-YEAR
UPFP#: 123456

III. EMPLOYEE TRAINING
EMPLOYEE TRAINING DESCRIPTION

The following describes the employee training provided for all employees that handle hazardous substances.

- 1. Training Topic - Procedures for handling hazardous materials, including hazardous wastes:

Persons Trained: MECHANICS

Training Time: 1-2 HOURS Refresher Frequency: ANNUALLY Refresher Time: 1 HOUR

Training Content:

- Proper management procedures for hazardous materials, including review of material safety data sheets and safety procedures for materials handling.
- Proper procedures for hazardous waste management, including storage, labeling, and disposal procedures.
- Record keeping requirements.

- 2. Training Topic - Procedures for communication and coordination with emergency response agencies:

Persons Trained: EMERGENCY COORDINATOR, ALTERNATE AND OWNER

Training Time: 1 HOUR Refresher Frequency: ANNUALLY Refresher Time: 1 HOUR

Training Content:

- Emergency response plan communication and notification procedures.
- Coordination with emergency services: fire department, paramedics and/or clean-up contractor.

- 3. Training Topic - Use of emergency response equipment and materials under the business control:

Persons Trained: MECHANICS

Training Time: 1-2 HOURS Refresher Frequency: ANNUALLY Refresher Time: 1 HOUR

Training Content:

- Annual inspection and maintenance of safety equipment (fire extinguishers, eye wash stations, gloves, safety glasses, etc.).
- Proper use of safety equipment
- Proper use of spill control equipment (absorbent, hydrophobic mops, etc.)

For a more detailed list of safety and spill control equipment see page xx (formerly known as 24)

Training Topic - Emergency Response Plan implementation:

- 4. Persons Trained: ALL EMPLOYEES

Training Time: 1-2 HOURS Refresher Frequency: ANNUALLY Refresher Time: 1 HOUR

Training Content:

- Location of the emergency response plan
- Emergency response plan evacuation procedures
- Location of emergency shut-off switches and specific responsibilities of all employees

A drill encompassing safety and spill equipment operation procedures is used by some employers to train employees and improve their emergency response skills.