

## Environmental Training Federal Requirements

Program	Federal Regulations	Who Needs Training?	When	What must be covered?	Record Retention
<b>Hazardous Waste</b>					
Small Quantity Generator (SQG)	40 CFR 262.16 (b)(9)(iii)	SQG - all employees assigned to waste handling and emergency response duties during normal facility operations and emergencies	There is no specific time contained in the regulations. However, to ensure and maintain HW compliance employees must not work in unsupervised positions until they have completed the training.	<u>SQG</u> -thorough familiarity with proper waste handling and emergency procedures.	Records that document the type and amount of initial and refresher training given to each person must be kept until closure of the facility.
Large Quantity Generator (LQG)	40 CFR 262.17 (a)(7)	LQG - all facility personnel who manage hazardous	<p>LQG facility personnel must successfully complete the training program <u>within six (6) months</u> after the date of their employment or assignment to the hazardous waste duties, whichever is later.</p> <p>Employees must not work in unsupervised positions until they have completed the training.</p> <p>LQG facility personnel must take part in an <i>annual review</i> of the initial training.</p>	<p><u>LQG</u> - Training program must be directed by a person trained in hazardous waste management procedures and must include hazardous waste management procedures relevant to the positions in which they are employed. May be classroom discussion, on-line, or on-the-job.</p> <p>At a minimum, the training must cover emergency procedures, emergency equipment, and emergency systems.</p> <p>Personnel that receive emergency response training pursuant to Occupational Safety and Health Administration OSHA regulations 29 CFR 1910.120(p)(8) and 1910.120(q) (HAZWOPER), the large quantity generator is not required to provide separate emergency response training provided that the overall facility training meets all the conditions of the rule.</p>	<p>Training records on former employees must be kept for at least three years from the date the employee last worked at the facility.</p> <p>Personnel training records may accompany personnel transferred within the same company.</p>
<b>Universal Waste (UW)</b>					
Small Quantity Handler (SQH)	40 CFR 273.16	All employees who handle or have responsibility for managing universal waste	There is no specific time contained in the regulations. However, to ensure and	<u>SQH and LQH</u> : The information must describe proper handling and emergency procedures appropriate to the type(s) of	No requirements set forth under the regulations. However,

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Large Quantity Handler (LQH)	40 CFR 273.36	All employees who handle or have responsibility for managing universal waste	maintain UW compliance, employees must not work in unsupervised positions until they have completed the training.	universal waste handled at the facility.	in order to demonstrate compliance, facilities should maintain training records in accordance with RCRA requirements (see above).
<b>Used Oil</b>	40 CFR 279 (generator)	Employees who handle or have responsibilities for managing used oil.  This training is incorporated into the SPCC training requirements.	See <b>SPCC</b> training requirements	Employees must participate in a training session to discuss proper handling and response to spills of used oil.	Written training documentation/records are to be maintained with the SPCC Plan for a period of three years.
<b>Spill Control and Countermeasures (SPCC)</b>  Oil Storage-aboveground storage (ASTs) tanks are subject to SPCC requirements in addition to local/state fire codes for flammable/combustible liquids (NFPA standards)  Hazardous chemical ASTs are subject to EPCRA for chemical inventory reporting.	40 CFR 112.7 (f)  40 CFR 112.7 (e)	At a minimum, train all oil-handling personnel.  "Oil-handling personnel" includes employees engaged in the operation and maintenance of oil storage containers, the operation of equipment related to storage containers and emergency response personnel. Additionally, any oil-handling contractors at the facility must be trained as well.  SPCC regulations also require that one person be designated at each facility who is accountable for discharge prevention and who reports to facility management.	Training at the time of the employee's initial assignment on the SPCC regulations and Plan.  Annual discharge prevention briefings to ensure adequate understanding of the SPCC Plan for that facility. The annual briefings must also describe known discharges, failures, and/or malfunctioning components that occurred in the prior year.	<u>Initial</u> : The operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan.  <u>Annual</u> : refresher on the SPCC plan, actions taken in response to spill events, emergency protocols, and recently implemented practices and procedures.	Written training documentation/records are to be maintained with the SPCC Plan for a period of three years.
<b>Facility Response Plans (FRP)</b>  Facilities that could reasonably be expected to cause "substantial	40 CFR 112.21  Note: even if you don't meet the criteria for "substantial	Personnel involved in oil spill response activities.	In accordance with the facility's Response Plan.	Training is required on the procedures to respond to discharges of oil.  It is recommended that the training program be based on the USCG's Training Elements for Oil Spill Response, as applicable to facility operations. An alternative program can also	Logs of discharge prevention meetings, training sessions, and drills/exercises. These logs may be maintained as an

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<p>harm" to the environment by discharging oil into or on navigable waters.</p> <p>Substantial harm equals a total oil storage capacity greater than or equal to 42,000 gallons and it transfers oil over water to/from vessels; <b>or</b> a total oil storage capacity greater than or equal to 1 million gallons and meets one of the following conditions:</p> <p>a. does not have sufficient secondary containment for each aboveground storage area.</p> <p>b. is located at a distance such that a discharge from the facility could cause "injury" to fish, wildlife, and sensitive environments.</p> <p>c. is located at a distance such that a discharge from the facility would shut down a public drinking water intake.</p> <p>d. has had, within the past five years, a reportable discharge greater than or equal to 10,000 gallons.</p>	<p>harm," U.S. EPA has the authority to require FRPs.</p>			<p>be acceptable subject to approval by the Regional Administrator.</p> <p>Training shall be functional in nature according to job tasks for both supervisory and non-supervisory operational personnel.</p> <p>Trainers shall develop specific lesson plans on subject areas relevant to facility personnel involved in oil spill response and cleanup.</p> <p>Drills and exeprcises are required, with evaluation procedures. A program that follows the National Preparedness for Response Exercise Program (PREP) ise deemed satisfactory. An alternative program can also be acceptable subject to approval by the Regional Administrator.</p>	<p>annex to the Response Plan.</p>
<p><b>Clean Water Act NPDES/ SWPPP</b></p>	<p>40 CFR 122 40 CFR 125</p>	<p>All employees who work in areas where industrial activities or material handling activities are exposed to stormwater, or who are responsible for</p>	<p>Training at the time of the employee's initial assignment in areas where industrial activities or material handling activities are exposed to stormwater and whenever a</p>	<p>Employee training programs should instill all personnel with a thorough understanding of potential sources of contaminants, the contents of the SWPPP, BMPs, processes and materials they are working with, safety hazards, practices for preventing discharges,</p>	<p>Training content and attendance sheets for each training class to document that employees have participated.</p>

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		implementing activities necessary to meet the conditions of this permit (inspectors, maintenance personnel, and all members of the Pollution Prevention Team).	substantial change is made to facility's SWPPP.  EPA recommends ANNUAL refresher training to all employees.	and response procedures for toxic and hazardous material incidents.  Training can include: 1. posters, employee meetings, courses, and bulletin boards, and 2. field training programs that show areas of potential storm water contamination and associated pollutants, followed by a discussion of site-specific BMPs by trained personnel.	Maintain training documentation with the SWPPP Plan.
<b>Clean Water Act NPDES/ SARA 313</b>  Facilities covered by EPA's NPDES general permit for storm water discharges associated with industrial activity which are subject to reporting requirements under EPCRA Section 313 for chemicals classified as "water priority chemicals"	40 CFR 313 Water Priority Pollutants	Employees (not further defined)	Annual training is required.	*See SWPPP for content of training	Training agendas and employee attendance is required.
<b>Clean Air Act</b>  Title V Permit	40 CFR 60 (Appendix A), 61, and 62  40 CFR 60.273	Those who are responsible for the determination of the level or frequency of stack opacity and visible emissions as trained observers.	Semi-annual training requirement for the trained observers – training sessions held on site or offsite by a licensed training company.	There are mandatory requirements for the visible emissions training and certification program stipulated in Method 9 (40 CFR 60, Appendix A) and these items are considered the minimal program content and criteria necessary for a training program. Entitled "Visual Determination of the Opacity of Emissions from Stationary Sources"	Air monitoring and inspections are covered under the Title V air permit and should be retained by the permittee for a period of five (5) years.
<b>Underground Storage Tanks (UST)</b>	40 CFR 280  Class A operator is the person who has primary responsibility to	Those individuals who will serve as Class A, B and C operators	The following minimum training requirements for designated Class A, Class B, and Class C operators (new 2015).  ALL operators must be	Class A operators must either be trained or pass a comparable examination that provides general knowledge of the following requirements: spill and overfill prevention, release detection, corrosion protection, emergency response, product and equipment compatibility and demonstration, Financial	Maintain records identifying all currently designated operators at the facility: the record must include the operator's name and class, date

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	<p>operate and maintain the UST system according to the UST regulations.</p> <p>Class B operator is the person who has day-to-day responsibility for implementing the UST regulations.</p> <p>Class C operators are the first responders to emergency situations at a UST facility. They are usually clerks of the facility. Those who respond to alarms, releases, and other emergency situations; Control and/or monitor the dispensing or sale of regulated substances.</p>		<p>trained by October 13, 2018.</p> <p>After this date, new Class A and Class B operators must be trained within 30 days of assuming duties.</p> <p>Class C operators must be trained before assuming duties.</p> <p>Class A and B operators at UST systems determined to be out of compliance must be retrained within 30 days of the determination of noncompliance. For retraining, the training program or comparable examination must be developed or administered by an independent organization, the implementing agency, or a recognized authority.</p> <p>Retraining must, at a minimum, cover those areas found to be out of compliance. Retraining is not required if:</p> <ul style="list-style-type: none"> <li>• Class A and B operators take annual refresher training.</li> <li>• The implementing agency waives retraining.</li> </ul>	<p>Responsibility, notification and storage tank registration, temporary and permanent closure, reporting, recordkeeping, testing, and inspections.</p> <p>Class B operators must either be trained or pass a comparable examination about the regulatory requirements and typical equipment used at UST facilities; or site-specific requirements which address only the regulatory requirements and equipment specific to the facility: O&amp;M, spill and overfill prevention, release detection and related reporting, corrosion protection, emergency response, product and equipment compatibility, reporting, recordkeeping, testing, inspections, and the environmental and regulatory consequences of releases.</p> <p>Class C operators must either: be trained by a Class A or Class B operator; complete a training program; or pass a comparable examination. The training option chosen must teach or evaluate the Class C operator's knowledge to take appropriate actions (including notifying appropriate authorities) in response to emergencies or alarms caused by spills or releases resulting from the operation of the UST system.</p>	<p>assumed duties, and training or retraining dates.</p> <p>Maintain records of training and retraining. This record must have the trainee name, date trained, operator training class completed, name of training company or examiner, and the training company's name, address and telephone number.</p>
<p><b>Department of Transportation (DOT)</b> Hazardous Material (HAZMAT)</p>	<p>49 CFR 172.704</p>	<p>A person who: 1. loads, unloads, or handles hazardous materials; 2. designs, manufactures, fabricates, inspects, marks, maintains, reconditions,</p>	<p>Initial training: within 90 days of for new hazmat employee or a hazmat employee who changes job functions (must be directly supervised by a properly trained and</p>	<p>General awareness, security, function specific, and safety training.</p> <p>[Note: OSHA, EPA, and other training. Training conducted by employers to comply with the hazard communication programs required by OSHA (29 CFR 1910.120 or</p>	<p>Retain records for as long as employee is employed and 90 days thereafter. The record shall include: the HazMat employee's</p>

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		repairs, or tests a package, container or packaging component that is represented, marked, certified, or sold as qualified for use in transporting hazardous material in commerce; 3. prepares hazardous materials for transportation; 4. is responsible for safety of transporting hazardous materials; and/or 5.operates a vehicle used to transport hazardous materials.	knowledgeable hazmat employee until then)  Recurrent training: HazMat employee must receive the training required at least once every three years.	1910.1200) or EPA (40 CFR 311.1) may be used to satisfy certain portions of the HazMat training that are comparable to the other training.]	name; the most recent training completion date of the hazmat employee's training; a description, copy, or the location of the training materials; the name and address of the person providing the training; and certification that the hazmat employee has been trained and tested.
<b>International Standards Organization (ISO) 14001</b>	ISO 14001:2015 (Sections 7.2, 7.3, 7.4)	Employees who are key individuals within the organization with whom the EMS performance and objectives are directly aligned.  Other employees who technically fall outside this category, but also have an impact on the EMS and its performance by their actions and results, and who also may face questions from an auditor.	Employees should have the ability to apply knowledge and skills to achieve intended results. Under the standard there is no rigid rule for education and training with respect to the EMS, but it is clear that if the correct people are not trained, competent, and kept up to date, then performance will suffer and an auditor might note that training is inadequate.	Training that the facility deems critical to the performance and objectives of the EMS. Content determined by assessing the organization's needs. What level of knowledge is necessary to achieve the desired results? What level of technology, and what methods of communication? When all of these factors are considered, then the facility decides what level (content) of training and education is needed by which individuals.  General training should include an overview of the EMS, its objectives, results and initiatives. Ensure the EMS results and news of any initiatives are communicated to staff by whatever means the facility uses, such as a notice board or by electronic means.  Training can come in many forms, from enrollment in external programs offered by colleges, universities, or specialized training companies, to on-the-job training where an experienced person works with a less-experienced individual to teach them the knowledge they need to perform the job.	Maintain records of the training information that is needed to show successful implementation of EMS plan. This is evident in the requirements for competence, training, and awareness, since ISO 14001 specifies that the organization keep records to show that competencies have been achieved through education, training, or experience  Training content/information should be recorded in the individual's training record and kept with the ISO documents.
<b>Toxic Substance Control Act (TSCA) (PCBs)</b>	40 CFR 761	See SPCC Requirements	See SPCC Requirements	Prepare and implement an SPCC Plan. The owner or operator shall read "oil(s)" as "PCB(s)" whenever it appears.  The exemptions for storage capacity, 40 CFR 112.1(d)(2), and the amendment of SPCC plans by the Regional Administrator, 40 CFR	

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				112.4, shall not apply unless some fraction of the liquids stored in the container are oils as defined by section 311 of the Clean Water Act.	
<p><b>Risk Management Program (RMP)</b></p> <p>Required for facilities that use extremely hazardous substances. These Plans must be revised and resubmitted to EPA every five years.</p>	40 CFR 68.71	Employees involved in operating a process and supervisors with process operational responsibilities.	Before being involved in operating a process and at least every three years afterward.	<p>Initial training: an overview of the process and the operating procedures as specified in § 68.69. The training shall include emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.</p> <p>Refresher training: Assure that employees understand and adhere to the current operating procedures of the process. The owner or operator, in consultation with the employees involved in operating the process, shall determine the appropriate frequency of refresher training.</p>	A record that contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.