

TYPICAL ENVIRONMENTAL TRAINING REQUIREMENTS FOR A MEDIUM SIZED MANUFACTURING FACILITY

MEVERDEN ENVIRONMENTAL, INC. - MARCH 2001

Type	Citation	Description	Applicability	Frequency	Req'd. Document	Trainer Certif.
Hazard Communication	29CFR1910.1200(h)	Must include HAZCOM Std., MSDSs, operations where hazardous chemicals used, location of plans and MSDSs, hazards, protection measures.	All "exposed" employees	One time at time of initial assignment or when hazards change.	None required	Not required
Large Quantity HW Generator	40CFR262.34(a)(4) 40CFR265.16	Must include waste handling methods, contingency plan, emergency procedures.	Supervisors and those handling hazardous waste.	Annually with less than 12 months between.	Attendance documented, detailed records, no testing required	Must be trained in hazardous waste management
Small Quantity HW Generator	40CFR262.34(d)(iii)	Ensure that employees are thoroughly familiar with proper waste handling relevant to their responsibilities.	Those handling hazardous waste	Not specified	Not specified	Not specified
HW Operations Responder Training	29CFR1910.120(e) 29CFR1910.120(q)(6)(ii-v)	Very comprehensive. Must include S&H hazards, S&H plan, PPE, work practices, medical surveillance.	Employees involved in HW clean-ups or hazardous substance emergency response.	Initial 40 or 24 hour training depending on responsibilities and annual 8 hour refresher.	Certificate must be issued	Specific training or academic credentials
HW Operations Awareness Training	29CFR1910.120(q)(6)(i)	Must include sufficient training or experience to identify substances, understand hazards and understand emergency response plan.	Employees likely to witness or discover a hazardous substance release.	Initial training of new employees and annual refresher	Training record required, testing optional	Specific training or academic credentials
DOT Hazardous Materials	49CFR172.704	Must include familiarization with hazardous materials, emergency response, health and safety measures, proper material handling.	Person who loads, unloads or handles hazardous materials.	New employees within 90 days and when responsibilities change and every three years	Training records, testing required	Not specified
Stormwater	40CFR122.26	Management practices to prevent stormwater contamination.	Only if included in SWPPP.	As required by SWPPP	As required by SWPPP	None
SPCC	40CFR112.7(e)(10)	Instruction in operation and maintaining equipment to prevent oil spills. More detailed training required if facility response plan required.	Employees that operate or maintain equipment that could cause oil spill.	"Frequent enough to assure understanding of SPCC"	None required unless facility response plan in place	Not specified
OSHA Emergency Plans	29CFR1910.38	Requires training if emergency action plan has been prepared by specific OSHA standard (e.g., highly hazardous chemicals).	As required by specific standard.	As required by specific standard.	As required by specific standard	As required by specific standard
Process Safety Management	29CFR1910.119(g)	Very comprehensive including safety and health hazards, emergency procedures, startup and shutdown, process maintenance.	Each employee involved in operating a process using a highly hazardous chemical as well as contractors.	New employees immediately and every three years.	Training records and some means of verification that employee understood training.	Not specified
Universal Waste Rule	40CFR273.36 (LQG) 40CFR273.16 (SQG)	Must inform employees regarding proper handling and emergency procedures.	Handlers of batteries, pesticides or thermostats.	Not specified	Not specified	Not specified

Notes: This table is for information purposes only and not to be relied on. If it appears a specific requirement may apply to you, please consult the listed citation for more detailed information. Many training requirements are not included. Safety requirements such as lockout/tagout, PPE, confined space, bloodborne pathogen and many other safety training requirements are not included. With respect to environmental rules, training required by the Clean Air Act Risk Management program has not been included since the requirement is not effective until 1999. Superfund training requirements have also been omitted since most are relative to remediation. A cursory review indicates that Wisconsin training regulations regarding above items are substantially the same as Federal requirements.