

# Hazardous Waste Management

## Hazardous Waste Personnel Training for Large Quantity Generators

*This non-rule policy guidance document is intended to clarify for the public ADEM's interpretation of the rules concerning the training requirements for hazardous waste employees at large quantity generator sites or facilities. It is not intended to replace, limit, or expand upon the complete regulatory requirements found in Division 14 of the ADEM Administrative Code.*

### **Background**

In general, training may be defined as a method of preparing employees to perform a task by providing them with information about the task, a demonstration of its performance, and an opportunity for the employees to imitate the demonstration and provide subsequent feedback. Hazardous waste training equips employees with the knowledge and skills required to properly manage hazardous wastes and to respond appropriately to accidents or emergencies involving hazardous wastes.

The purpose of the personnel training requirement is to reduce the potential for mistakes and accidents which might threaten human health or the environment by ensuring that facility personnel who handle hazardous waste are thoroughly familiar with their duties and responsibilities. In this training, employees should be made aware of why they must perform certain tasks in a defined manner. Providing employees with a thorough explanation of how and why certain operations are to be performed should reduce the use of "short-cut" procedures that may lead to noncompliance conditions, accidents, and emergency situations.

### **Why provide Training?**

If your facility is a large quantity generator (LQG) as defined in ADEM Administrative Code rule ("ADEM Admin. Code r.") 335-14-1-.02(1)(a), you may accumulate hazardous waste on site for 90 days or less without a permit or interim status provided that you comply with, among other things, the personnel training requirements of ADEM Admin. Code r. 335-14-3-.01(7)(a)7.

The personnel training requirements allow your facility to develop and customize its training program to meet the needs of your employees, ensuring that the type and amount of training given is sufficient for facility personnel (both in supervisory and non-supervisory roles) to achieve and maintain compliance with all applicable hazardous waste management standards.

The facility is required to provide sufficient training to employees to enable them to comply with the hazardous waste management rules that apply to the work they do. In addition, the training program must ensure that all employees are familiar with emergency procedures related to their jobs and are able to effectively respond to an emergency situation. All facility personnel assigned to hazardous waste management positions must become familiar with the company's basic emergency procedures as described in the company's hazardous waste contingency plan.

### **Who must be trained?**

You must provide training to all persons responsible for ensuring compliance with ADEM's hazardous waste program regulations, including anyone who reads and interprets the Alabama Hazardous Wastes Management and Minimization Act (hereinafter "AHWMMA") regulations, develops facility procedures, or trains other employees. This would include, for example, environmental coordinators, hazardous waste manifest preparers, hazardous waste drum haulers or forklift operators, and certain on-site contract employees.

### **When and how often must training be completed?**

Employees must successfully complete the program required in 335-14-3-.01(7)(a)7.(i) within six months after the date of their employment or assignment to the facility, or to a new position at the facility, whichever is later. Employees must not work in unsupervised positions until they have completed the training. In addition, employees must take part in an annual review of the initial training. Training is required as long as the employees occupy jobs that involve regulated hazardous waste management.

### **What are the basic hazardous waste training requirements?**

Employees must be provided training that enables them to do their jobs safely and in accordance with the applicable regulatory requirements. At a minimum, the training program must 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. Ultimately, you are responsible for determining the training needs for your facility and then establishing

