


# Employee Training Requirements

Presented by  
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Annual Training Conference  
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1

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2

## NES iPad Giveaway

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- [kingsumo.com/g/fuartz/nes-ipad-giveaway/ezq7xlk](https://kingsumo.com/g/fuartz/nes-ipad-giveaway/ezq7xlk)
  - Apple 10.2-Inch iPad (9th Gen)
    - Wi-fi / 64GB storage / space gray color
    - Valued at \$329.99
  - Enter by March 31, 5:00 p.m. PST
  - One winner, must have valid email
    - Winner will be chosen by April 7
- Link in chat & at *NES* virtual booth



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3

## Objective

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- Cover employee training requirements for the CUPA programs and select OSHA training requirements
  - Who
  - When
  - What



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4

## Outline

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- Aboveground Petroleum Storage Act (APSA)
- California Accidental Release Prevention (CalARP) Program
- Hazardous Materials Business Plans (HMBP)
- Hazardous Waste Generators
- Underground Storage Tanks (USTs)
- OSHA



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5

## Aboveground Petroleum Storage Act



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6

## Aboveground Petroleum Storage Act

[40 CFR 112.7(f)]

- Who
  - Oil-handling personnel
- When
  - At least once per year
- What
  - Discharge procedure protocols
  - Operation and maintenance of equipment to prevent discharges
  - Pollution control laws, rules, and regulations
  - Facility operations
  - Spill Prevention, Control, and Countermeasure (SPCC) Plan contents



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7

## California Accidental Release Prevention Program



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8

## California Accidental Release Prevention Program

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- Program 2 Prevention Program
- Program 3 Prevention Program
- Program 4 Prevention Program



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9

## Program 2 Prevention Program

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[19 CCR 2755.4]

- |  |   |
|--|---|
| <ul style="list-style-type: none"><li>➤ Who<ul style="list-style-type: none"><li>◦ Employees operating a covered process</li></ul></li><li>➤ When<ul style="list-style-type: none"><li>◦ Initial training: Prior to operating a covered process</li><li>◦ Refresher training: At least once every three years<ul style="list-style-type: none"><li>• More often if necessary</li><li>• Training must be documented</li></ul></li></ul></li></ul> | <ul style="list-style-type: none"><li>➤ What<ul style="list-style-type: none"><li>◦ Initial startup</li><li>◦ Normal operations</li><li>◦ Temporary operations</li><li>◦ Emergency shutdown and operations</li><li>◦ Normal shutdown</li><li>◦ Startup</li><li>◦ Consequences of deviations</li><li>◦ Equipment inspections</li></ul></li></ul> |
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10

## Program 3 Prevention Program

[19 CCR 2760.4]

- Who
  - Employees involved in an operating process
- When
  - Initial training: Prior to being involved in an operating process
  - Refresher training: At least once every three years
    - More often if necessary
    - Documentation
      - Employees name and training date
      - Measure to verify training
- What
  - Steps for each operating phase
  - Startup
  - Normal operations
  - Temporary operations
  - Emergency shutdown
  - Normal shutdown
  - Startup
  - Operating limits



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11

## Program 4 Prevention Program

[19 CCR 2762.4]


- Who
  - Employees involved in an operating process
- When
  - Initial training: Prior to being involved in an operating process
  - Refresher training: At least once every three years
    - More often if necessary
    - Documentation
      - Training certification
- What
  - Steps for each operating phase
  - Startup
  - Normal operations
  - Temporary operations
  - Emergency shutdown
  - Normal shutdown
  - Startup
  - Operating limits



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12

# Hazardous Materials Business Plans



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13

## Hazardous Materials Business Plans

[HSC 25505(a)(4)]

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<p>➤ Who</p> <ul style="list-style-type: none"><li>◦ All employees</li><li>◦ Training can take into consideration position of each employee</li></ul> <p>➤ When</p> <ul style="list-style-type: none"><li>◦ Initial training: When hired</li><li>◦ Refresher training: Annually</li><li>◦ Documentation<ul style="list-style-type: none"><li>◦ Electronic or hard copies retained for a minimum of three years</li></ul></li></ul>	<p>➤ What</p> <ul style="list-style-type: none"><li>◦ Emergency response plans and procedures</li><li>◦ Notifications<ul style="list-style-type: none"><li>◦ Local emergency response personal</li><li>◦ CUPA</li></ul></li><li>◦ Mitigation procedures<ul style="list-style-type: none"><li>◦ Minimize harm to people, property, and environment</li></ul></li><li>◦ Evacuation plans and procedures</li></ul>
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14

# Hazardous Waste Generators



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15

# Hazardous Waste Generators

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- Small Quantity Generators
- Large Quantity Generators
- Universal Waste Handlers



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16



## Small Quantity Generators

[40 CFR 262.16(b)(9)(iii)]

- Who
  - Employees who generate and/or manage hazardous waste
- When
  - Not specified
    - Recommended prior to employees assuming these duties
    - Annual training is a best management practice
- What
  - Proper waste handling
  - Emergency response procedures
    - Training must be relevant to employee's responsibilities during normal operations and emergencies



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17

## Large Quantity Generators

[22 CCR 66265.16]

- Who
  - Facility personnel who generate and/or manage hazardous waste
- When
  - Initial training: Within 180 days of hire or job placement
  - Refresher training: Annually after initial training
- Documentation
  - Description for each position
  - Job title for each position
  - Description of the type and length of training needed for each position
- Records
  - Current employees: until facility closure
  - Former employees: three years from the date the employee last worked at the facility



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18

## Large Quantity Generators

[22 CCR 66265.16]

- What
  - Proper waste handling
  - Emergency response procedures
    - Mitigation
    - Abatement
    - Notification procedures
    - Emergency equipment
    - Emergency systems
  - DOT Hazmat Employee training [49 CFR 172.704]
    - Required for personnel engaged in shipping hazardous waste
    - Initial training: Within 90 days
    - Refresher training: Once every three years
  - Personnel must successfully complete the training through classroom, computer-based, or electronic instruction, or on-the-job (OTJ) training



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19

## Universal Waste Handlers

[22 CCR 66273.36]

- Who
  - Personnel who manage universal wastes
    - Personnel who manage universal waste is anyone who consolidates, sorts, treats, recycles, packages for transport, offers for transport, or physically relocate universal waste containers
- When
  - Initially
  - Refresher training: Annually after initial training
- Documentation
  - Written record
    - Names and date of training
- Records
  - Three years from date of training



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20

## Universal Waste Handlers

[22 CCR 66273.36]

- What
  - Hazards associated with universal wastes
  - Location of universal waste containers
  - Procedures for responding to releases of universal wastes
  - Labeling, collecting, handling, consolidating, and shipping universal wastes
- Training Materials
  - Must be in the form of any written media:
    - Brochures
    - Email
    - Company letters/procedures
    - Pamphlets
    - Posters



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21

## Underground Storage Tanks



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22

## Underground Storage Tanks

[23 CCR 27715(c)]

- Who
  - Employees responsible for operating UST
- When
  - Initial training: Within 30 days
  - Refresher training: Annually
- What
  - Operation of UST
  - Monitoring equipment
  - Spills and overfills
  - Name of contact person for emergencies and monitoring equipment alarms



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23

## Underground Storage Tanks

[23 CCR 27715(c)]

- Training must be provided by a designated UST operator
- At least one trained employee must be present during operating hours
- A list of trained employees must be kept on-site
  - Dates of training for all facility employees
  - Hire dates for all facility employees



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# OSHA



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25

## HAZWOPER

[8 CCR 5192]

- Clean-up operations
  - General Site Workers – 40 hours + 3 days field experience
  - Occasional Site Workers – 24 hours + 1 day field experience
  - On-Site Managers & Supervisors – 8 additional hours
  - All – 8 hours of refresher training annually
- TSD Facilities
  - 24 hours of initial training
  - 8 hours of refresher training annually
- Emergency Response
  - First Responder Awareness
  - First Responder Operations – 8 hours initial training
  - Hazardous Materials Technician / Specialist – 24 hours of initial training
  - Incident Commander/On-Scene Manager – 24 hours of initial training
  - All – annual training, of sufficient content and duration, to maintain competency



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## Hazard Communication

[8 CCR 5194(h)]

- Who
  - Employees who may be exposed to hazardous chemicals
- When
  - Initial training: Upon hire
  - Refresher training: When new hazardous chemicals are used
- What
  - Where hazardous chemicals are present
  - Chemical hazards
  - Safety data sheets
  - Written Hazard Communication program
  - Detecting hazardous chemical releases



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## Any Questions?

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28