



BASICS OF HAZARDOUS WASTE TRAINING FOR INDUSTRY

J-3/31 Steve Reichow

March 31, 2022



**24th California Unified Program
Annual Training Conference
March 22, 23, 24, 29, 30, 31 - 2022**

Thank you to all our 2022 SPONSORS and EXHIBITORS!



A Republic Services Compar



Announcement - Zoom for Q&A

- Since we are in a Zoom meeting, we'll be using the Zoom Q&A for questions and we'll just be staying here for post session conversation after our meeting is over.



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Other Important CUPA 2022 Info for You

- Most of last week's Sessions are available as "Watch Now"
- Slido for Polls/Q&A for 90% of Sessions
- Check for Post Zoom meeting follow up link in Q&A
- Zoom meetings – Use Q&A/Stay in meeting for post Session...there will be NO "Are you still watching?" in Zoom
- To earn CEUs, make sure to join the Session within the first 10 minutes for LIVE Sessions, click on "Are you still watching?" popups and attend at least 90% of the Session. Complete Session Evaluations and Conference Survey.



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NES iPad Giveaway

- kingsumo.com/g/fuartz/nest-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



Objective

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

Outline

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



Aboveground Petroleum Storage Act

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

California Accidental Release Prevention Program



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California Accidental Release Prevention Program

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



Program 2 Prevention Program

[19 CCR 2755.4]

➤ Who

- Employees operating a covered process

➤ When

- Initial training: Prior to operating a covered process
- Refresher training: At least once every three years
 - More often if necessary
 - Training must be documented

➤ What

- Initial startup
- Normal operations
- Temporary operations
- Emergency shutdown and operations
- Normal shutdown
- Startup
- Consequences of deviations
- Equipment inspections

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

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

Hazardous Materials Business Plans



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Hazardous Materials Business Plans

[HSC 25505(a)(4)]

➤ Who

- All employees
 - Training can take into consideration position of each employee

➤ When

- Initial training: When hired
- Refresher training: Annually
 - Documentation
 - Electronic or hard copies retained for a minimum of three years

➤ What

- Emergency response plans and procedures
- Notifications
 - Local emergency response personal
 - CUPA
- Mitigation procedures
 - Minimize harm to people, property, and environment
- Evacuation plans and procedures

Hazardous Waste Generators



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Hazardous Waste Generators

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



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

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

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

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

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

Underground Storage Tanks



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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

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

OSHA

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

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

Any Questions?

Presented by Steve Reichow, NES, Inc., sreichow@nesglobal.net, (916) 353-2360



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