

St.Germain ■ Collins

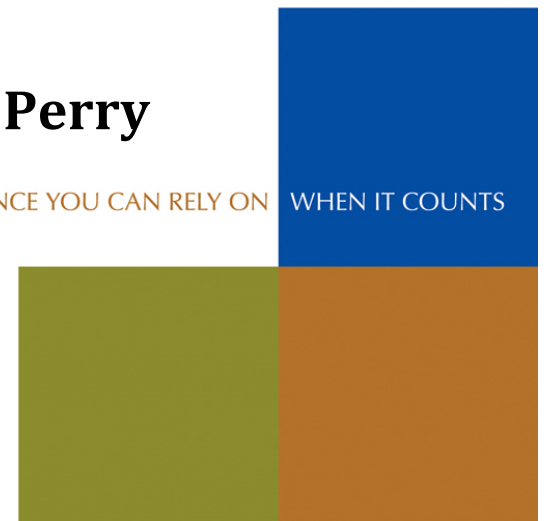
Environmental Training Requirements



Presented by:
Mike Rioux, CHMM and Sandra Perry

October 24, 2016

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS



Webinar Topics

Environmental Training Requirements

- Maine Resource Conservation and Recovery Act (RCRA)
- U.S. Department of Transportation (DOT): Hazardous Materials Shipping
- International Air Transport Association (IATA): Dangerous Goods Shipping by Air
- Clean Water Act (CWA): Oil Pollution Prevention and Stormwater Pollution Prevention
- Clean Air Act (CAA): Chemical Accident Prevention



EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

Program Content

- Regulatory Citations
- Training Objectives
- Training Elements
- Who Needs Training
- Trainer Qualifications
- Frequency and Duration



EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

Resource Conservation and Recovery Act (RCRA)

Maine Training Requirements



St.Germain Collins

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

4

Maine RCRA Training Requirements

CMR Ch. 851 Section 8(B)(5) and 40 CFR 264.16
State of Maine Personnel Training Requirements
Large Quantity Generators (LQGs) (generate >100 kg/month)

Training Objective:

To teach employees to perform their duties as they pertain to hazardous waste management in accordance with the MEDEP Rules including the implementation of their Hazardous Waste Contingency Plan (HWCP).

HAZARDOUS WASTE
FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR
PUBLIC SAFETY AUTHORITY OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERATOR INFORMATION:
NAME: _____
ADDRESS: _____
CITY: _____ STATE: _____ ZIP: _____
EPA ID NO. _____ EPA WASTE NO. _____
ACCUMULATION START DATE: _____ MANIFEST TRACKING NO. _____
DO NOT PROPER SHIPPING NAME AND OR NA NO. WITH PREFIX
HANDLE WITH CARE!

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

5

Maine RCRA Training Requirements

Training Elements

1. Waste determinations
2. Pre-transport requirements, packaging, labeling, and marking
3. Satellite Accumulation Area (SAA) requirements
4. Hazardous Waste Storage Area (HWSA) requirements
5. HWCP awareness
 - Purpose of the plan
 - Incidental spill vs. emergency spill
 - Emergency Coordinators
 - Whom to notify when a spill occurs

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

6

Maine RCRA Training Requirements

Training Elements for HWCP Implementation:

1. Emergency Coordinators and others with a role in the plan
2. Incidental spill vs. emergency spill
3. Response to spills, fires, explosions and groundwater contamination
4. Communication and alarm systems
5. Evacuation procedures
6. Process operations and electrical cut-off systems
7. Inspecting and maintaining emergency response equipment
8. Internal and external notifications
9. Updating and amending the HWCP
10. Emergency response agreements

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

7

Maine RCRA Training Requirements

Whom to Train:

Facility personnel must be trained in hazardous waste procedures relevant to their position (i.e. job description, tasks and duties).

Trainer Qualifications:

Training to be conducted by a person trained in hazardous waste management.

Maine RCRA Training Requirements

Frequency/Duration:

- Annual training is required.
- New employees or employees newly assigned to manage hazardous waste must not work in an unsupervised position until trained.
- Duration of training is not specified.

U.S. Department of Transportation (DOT) Shipments of Hazardous Materials/Wastes



St.Germain Collins

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

10

U.S. DOT – Shipments of Hazardous Materials/Wastes

49 CFR Part 172 Subpart H Shipments of Hazardous Materials/Wastes

Applicability:

Facilities that -

- Offer hazardous materials (including wastes) for shipping.
- Package, mark or label hazardous material for transportation.
- Load/unload hazardous materials transport-vehicles.
- Transport hazardous materials.
- Receive and forward packages containing hazardous materials.

St.Germain Collins

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

11

U.S. DOT – Shipments of Hazardous Materials/Wastes

Training Objective:

To ensure the safe and proper ground transportation of hazardous materials.

Training Elements:

1. General awareness – all hazmat employees.
2. Function-specific – specific job duties.
3. Safety training – emergency response procedures and personal protection.
4. Security awareness.
5. Facility-specific security.

➤ Testing is required.

U.S. DOT – Shipments of Hazardous Materials/Wastes

Whom to Train:

- Hazmat Employees
 - Any employee “who in the course of employment directly affects hazardous materials transportation safety”.
 - Employer determines details of training required per job function.

Trainer Qualifications:

- Training may be provided by employer or public or private sources.
- The employer is responsible for ensuring adequate training for each Hazmat employee.

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

13

U.S. DOT – Shipments of Hazardous Materials/Wastes

Frequency/Duration:

- Initial training - under trained supervision and within 90 days of employment or new job function.
- Recurrent – at least once every three years.
- In-depth security training within 90 days of implementation of a revised security plan.
- Duration of training is not specified.

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

14

International Air Transport Association (IATA)



St.Germain Collins

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

15

International Air Transport Association (IATA)

49 CFR Part 171.22, 23, 24 / IATA DGR 1.5

International Civil Aviation Organization (ICAO)

Dangerous Goods Regulations (DGR) - Shipping by Air

Applicability:

Employees who prepare shipments of hazardous materials also regulated as dangerous goods under the IATA DGR must have a detailed understanding of the IATA rules that apply to their hazmat job function.

Training Objective:

To ensure safety, proper packaging, labeling, and documentation of dangerous goods.

St.Germain Collins

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

16

International Air Transport Association (IATA)

Training Elements:

1. Format of the regulations.
2. Use of the List of Dangerous Goods.
3. Packaging.
4. Labeling and marking.
5. Limited and Excepted quantities.
6. Handling and safety requirements.
7. Proper documentation.



St.Germain Collins

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

17

International Air Transport Association (IATA)

Whom to Train:

Training is required for all individuals who affect the air transportation safety of dangerous goods.

Trainer Qualifications:

Instructors must “have adequate instructional skills and must have successfully completed a DG training program”.

Frequency/Duration:

Initial training is required prior to being allowed to ship dangerous goods.

- Recurrent training is required every two years.
- Duration of training is not specified.

St.Germain Collins

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

18

Clean Water Act – Oil Pollution Prevention



St.Germain Collins

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

19

Clean Water Act – Oil Pollution Prevention

40 CFR Part 112 – Oil Pollution Prevention

Applicability:

Facilities required to have an Oil Spill Prevention Control and Countermeasure (SPCC) Plan

- >42,000 gallons underground storage
- >1,320 gallons aboveground storage
 - \geq 55-gallon capacities (e.g., drums, elevator reservoirs, coolant reservoirs, transformers, etc.)

Training Objective:

To help prevent releases of oil and promote facility safety.

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

20

Clean Water Act – Oil Pollution Prevention

Training Elements:

1. Equipment operations and maintenance to prevent discharges.
2. Discharge procedures and protocols.
3. Applicable pollution control laws and regulations.
4. General facility operations.
5. Contents of the facility Oil SPCC Plan.
6. Description of known discharges or failures.
7. Recently implemented best management practices.

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

21

Clean Water Act – Oil Pollution Prevention

Whom to Train:

“Oil-handling personnel” – employees engaged in the operation and maintenance of oil-storage containers or the operation of equipment related to storage containers and emergency response personnel.

Trainer Qualifications:

Not specified; owner/operator is required to ensure adequate training.

Frequency/Duration:

- Annual training is required.
- Duration of training is not specified.

Clean Water Act – Stormwater Pollution Prevention



St.Germain Collins

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS



Clean Water Act – Stormwater Pollution Prevention

40 CFR Part 122.26

2015 NPDES Multi-Sector General Permit (MSGP) for Industrial Activities Associated with Stormwater Discharges

Applicability:

Facilities regulated under federal stormwater regulations for industrial activities with potential stormwater exposure to significant materials.

Training Objective:

Implementation of Best Management Practices to prevent storm water contamination and familiarity with Stormwater Pollution Prevention Plan (SWPPP) content/permit requirements.

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

Clean Water Act – Stormwater Pollution Prevention

Training Elements:

1. Overview of the Stormwater Pollution Prevention Plan (SWPPP) contents.
2. Spill response procedures.
3. Good housekeeping.
4. Maintenance requirements.
5. Material management practices.
6. Type and location of site controls for stormwater pollution prevention.
7. Inspections, monitoring, recordkeeping, and corrective actions.

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

25

Clean Water Act – Stormwater Pollution Prevention

Whom to Train:

All employees that work in areas where industrial materials or activities are exposed to stormwater and for employees that are responsible for implementing activities identified in the Stormwater Pollution Prevention Plan (SWPPP).

Trainer Qualifications:

Not specified; owner/operator is required to ensure adequate training.

Frequency/Duration:

- Annual training is required.
- Duration of training is not specified.

Clean Air Act – Chemical Accident Prevention Provisions



EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

Clean Air Act – Chemical Accident Prevention Provisions

40 CFR Part 68 - Risk Management Planning (RPM)

- Section 68.54 for Program 2 Prevention Program and Section 68.71 for Program 3 Prevention Program

Applicability:

Owners/operators of a stationary source that stores/uses more than a threshold quantity of a regulated substance in process, and qualifies for either a Program 2 or Program 3 Prevention Program.

- Examples of regulated substances include:
 - Ammonia (10,000 lbs.)
 - Chlorine (2,500 lbs.)
 - Nitric acid (15,000 lbs.)
 - Propane; non-retail (10,000 lbs.)

Clean Air Act – Chemical Accident Prevention Provisions

Training Objective:

To minimize the potential for a catastrophic release of regulated substances in process.

Training Elements:

1. Initial training – specific safety and health hazards; emergency operations, safe work practices.
2. Refresher training – to assure that the employee understands and adheres to current operating procedures.

EXPERIENCE YOU CAN RELY ON WHEN IT COUNTS

29

Clean Air Act – Chemical Accident Prevention Provisions

Whom to Train:

Employees involved in an operating process.

Trainer Qualifications:

Not specified; owner/operator is required to ensure adequate training.

Frequency/Duration:

- Initial training and prior to process startup.
- Refresher training – at least every 3 years.



St.Germain ■ Collins

Mike Rioux

Certified Hazardous Materials Manager
miker@stgermaincollins.com

Sandy Perry

Senior Project Manager
sandyp@stgermaincollins.com

St.Germain Collins

846 Main Street
Westbrook, Maine 04092
(207) 591-7000
www.stgermaincollins.com
www.sentryehs.com

