

EH&S Training Requirements – Federal

RCRA – Hazardous Waste Management						
Regulation	Applicability	Training Objective	Training Elements	Whom to Train / Trainer Qualifications	Frequency / Duration	Recordkeeping / Documentation
40 CFR Part 262.34(a)(4) and (b)	Hazardous Waste Generators –Basic Training Requirements.	To perform duties related to hazardous waste management, in a way that ensures the facility’s compliance. The generator must ensure that all employees are thoroughly familiar with proper waste handling... relevant to their responsibilities during normal facility operations and emergencies.	Basic training requirements for hazardous waste handling include: 1. Pre-transport requirements, 2. Packaging, labeling, and marking, 3. Accumulation time, recordkeeping and reporting, and 4. Manifests (shipping papers).	Facility personnel must be trained in hazardous waste procedures relevant to their position (i.e., job description, tasks and duties). Training to be conducted by a person trained in hazardous waste management.	Annual training required. New employees or employees newly assigned to manage hazardous waste must not work in unsupervised position until trained. Within 6 months of their date of employment or assignment. Duration of training is not specified.	Job titles and names of employees. Written job descriptions (skills required, education, job duties). Written description of type and amount of introductory and continuing training. Records that document the training and/or job experience. Maintain records for current employees until facility closure or 3 years for former employees.
40 CFR Part 265.16 – Standards for Treatment, Storage & Disposal Facilities	Hazardous Waste Generators for Hazardous Waste Contingency Plan Implementation (per 40 CFR Part 265.16 – Personnel Training.	To perform duties related to hazardous waste management in a way that ensures the facility’s compliance.	Facility- and function-specific training on: 1. Specific job duties, 2. Emergency response procedures, equipment and systems; e.g., communications/ alarms systems, 3. Response to spills, explosions, or fires, 4. Using emergency response equipment, etc.			

NOTE: State training requirements may differ from those above. Review your state’s regulations, check with state agencies, or call St.Germain Collins (207) 591-7000 for assistance in determining training requirements to ensure you are in compliance with applicable regulations.

U.S. DOT – Hazardous Materials/Waste Shipping						
Regulation	Applicability	Training Objective	Training Elements	Whom to Train / Trainer Qualifications	Frequency / Duration	Recordkeeping / Documentation
49 CFR Part 172.704 Subpart H – Shipments of Hazardous Materials	Facilities who: <ul style="list-style-type: none"> - Offer hazardous materials for shipping. - Packages, marks or labels hazardous material for transportation, - Loads/unloads hazardous materials transport vehicles, - Transports hazardous materials, - Receives and forwards packages containing hazardous materials. 	To ensure the safe and proper transportation of hazardous materials.	<ol style="list-style-type: none"> 1. General Awareness – all hazmat employees: 2. Function-specific - specific job duties, 3. Safety training – emergency response procedures, procedures for avoiding accidents and personal protection, 4. Security awareness, and 5. Facility-specific security training. <p>Elements may be satisfied by training in other regulated programs.</p>	<p>Hazmat Employees – any employee “who in the course of employment directly affects hazardous materials transportation safety.”</p> <p>Employer determines the details of training required per job function.</p> <p>Training may be provided by employer or public or private sources. Employer is responsible for adequate training for each Hazmat employee.</p>	<p>Initial training – under trained supervision and within 90 days of employment or job function.</p> <p>At least once every three years; or sooner in the event of significant rule changes.</p> <p>Duration of training is not specified.</p>	<p>Training records:</p> <ul style="list-style-type: none"> - Employee’s name, - Most recent training completion date, - Description, copy or location of training materials, - Name and address of trainer, and - Certification that the hazmat employee has been trained and tested. <p>Maintain documentation for 3 years and 3 months.</p>

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IATA – Dangerous Goods Regulations – Shipping by Air						
Regulation	Applicability	Training Objective	Training Elements	Whom to Train / Trainer Qualifications	Frequency / Duration	Recordkeeping / Documentation
International Air Transport Association (IATA) – Dangerous Goods Regulations (DGR)	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.	To ensure the safety, proper packaging, labeling and documentation of dangerous goods for air shipments.	<ol style="list-style-type: none"> 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, and 7. Proper documentation. 	<p>Training is required for all individuals who affect the air transportation safety of dangerous goods.</p> <p>Trainer qualifications are not specified.</p>	<p>Initial training is required prior to being allowed to ship dangerous goods.</p> <p>Recurrent training is required every two years.</p> <p>Duration of training is not specified.</p>	<p>Training records:</p> <ul style="list-style-type: none"> - Employee's name, - Most recent training completion date, - Description, copy or location of training materials, and - Name and address of trainer.

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CWA – Oil Spill Prevention Control and Countermeasures						
Regulation	Applicability	Training Objective	Training Elements	Whom to Train / Trainer Qualifications	Frequency / Duration	Recordkeeping / Documentation
40 CFR Part 112.7(f) Oil Pollution Prevention	Facilities required to have an Oil Spill Prevention Control & Countermeasure (SPCC) Plan ->42,000 gals UST ->1,320 gals AST (including ≥55 gallon containers in threshold determination).	To help prevent releases of oil and promote facility safety.	<ol style="list-style-type: none"> 1. Equipment O&M to prevent discharges. 2. Discharge procedure protocols. 3. Applicable pollution control laws & 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. 	<p>“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.</p> <p>Trainer qualifications are not specified.</p>	<p>Annual training is required.</p> <p>Duration of training is not specified.</p>	Not specified in the regulation.

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CWA – Stormwater Pollution Prevention - Multi-Sector General Permit for Industrial Activities						
Regulation	Applicability	Training Objective	Training Elements	Whom to Train / Trainer Qualifications	Frequency / Duration	Recordkeeping / Documentation
2015 NPDES MSGP Section 2.1.2.8	Industrial facilities regulated under the federal stormwater regulations for industrial activities with potential stormwater exposure to significant materials.	Implementation of Best Management Practices to prevent stormwater contamination and familiarity with the Stormwater Pollution Prevention Plan (SWPPP) content and permit requirements.	The facility-specific SWPPP will describe the elements of the training program. Required elements include: <ol style="list-style-type: none"> 1. Overview of the SWPPP contents. 2. Spill response. 3. Good housekeeping. 4. Maintenance requirements. 5. Material management practices. 6. Type and location of site controls for stormwater pollution prevention. 7. Inspections, recordkeeping, and corrective actions. 	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 SWPPP (including the Pollution Prevention Team). Trainer qualifications are not specified.	Routine training is required. Duration of training is not specified.	All records must be kept with the SWPPP.

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CAA – Chemical Accident Prevention Provisions						
Regulation	Applicability	Training Objective	Training Elements	Whom to Train / Trainer Qualifications	Frequency / Duration	Recordkeeping / Documentation
40 CFR Part 68 Section 68.54; For Program 2 Prevention Program and Section 68.71 for Program 3 Prevention Program	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.	To minimize potential for a catastrophic release of regulated substances in process; e.g., <ul style="list-style-type: none"> • Ammonia (10,000 lbs.), • Chlorine (2,500 lbs.), • Nitric acid (15,000 lbs.), • Propane – non-retail (10,000 lbs.) 	<ol style="list-style-type: none"> 1. Initial training - specific safety and health hazards; emergency operations, safe work practices. 2. Trained or tested competent in operating procedures pertaining to their duties. 3. Refresher training – to ensure that the employee understands and adheres to current operating procedures of the process. 	<p>Employees involved in an operating process.</p> <p>Trainer qualifications are not specified; owner/operator is required to ensure training is adequate.</p>	<p>Initial training and prior to process startup.</p> <p>Refresher training – at least every 3 years.</p>	Records identifying the employee, date of training, and means used to verify the employees understanding of the training.

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OSHA – Occupational Health & Safety Act

Hazardous Waste Operations (HAZWOPER)						
Regulation	Applicability	Training Objective	Training Elements	Whom to Train / Trainer Qualifications	Frequency / Duration	Recordkeeping / Documentation
29 CFR 1910.120 (Section q) Hazardous Waste Operations and Emergency Response	Emergency response operations for releases of, or substantial threats of releases of, hazardous substances without regard to the location of the hazard.	To ensure that employees who are responding to an emergency are protected from safety and health hazards.	<ol style="list-style-type: none"> 1. Recognition of hazardous materials. 2. Notification procedures. 3. Basics of hazard recognition and risks associated with the cleanup of these materials. 4. Use of PPE. 5. Decontamination procedures. 6. Control and confinement operations. 	<p>Employees who participate, or are expected to participate, in emergency response.</p> <p>Trainer qualifications are not specified; owner/operator is required to ensure training is adequate.</p>	Annual refresher training of sufficient content and duration to maintain their competencies, or shall demonstrate competency in those areas at least yearly.	Documentation of training indicating the name of the employee and the date(s) of training.

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Hazard Communication						
Regulation	Applicability	Training Objective	Training Elements	Whom to Train / Trainer Qualifications	Frequency / Duration	Recordkeeping / Documentation
29 CFR 1910.1200(h) Hazard Communication	All facilities in which hazardous materials are in use.	To train facility employees to work safely with hazardous materials and to inform them of the proper personal protective equipment available for use with the material.	<ol style="list-style-type: none"> Categories of hazards (e.g., flammability, carcinogenicity). Properties and hazardous nature of the hazardous materials. Chemical-specific information such as labels and safety data sheets. 	<p>All employees who may be "exposed" to hazardous materials.</p> <p>Trainer qualifications not specified.</p>	<ol style="list-style-type: none"> At the time of their initial assignment to work with a hazardous material. Whenever the hazard changes or new hazardous materials are introduced. 	The rule does not require employers to maintain records of employee training, but employers are encouraged to do so to demonstrate compliance.

Laboratory Standard						
Regulation	Applicability	Training Objective	Training Elements	Whom to Train / Trainer Qualifications	Frequency / Duration	Recordkeeping / Documentation
29 CFR 1910.1450(f) Occupational Exposure to Hazardous Chemicals in Laboratories	All employees engaged in the laboratory use of hazardous chemicals.	To inform employees of the hazards of chemicals present in their work area.	<ol style="list-style-type: none"> Methods and observations that may be used to detect the presence or release of hazardous materials. Symbols representing physical and health hazards of chemicals used. Safety Data Sheets / Instruction on how to protect themselves from exposures. 	<p>All employees engaged in the use of materials deemed "laboratory chemicals".</p> <p>Trainer qualifications are not specified in the standard.</p>	<ol style="list-style-type: none"> Initial assignment to tasks where occupational exposure may take place. Thereafter, whenever deemed necessary (e.g., new exposures or refresher) by the employer. 	The rule does not require employers to maintain records of employee training, but employers are encouraged to do so to demonstrate compliance.

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