

This guidance document is advisory in nature but is binding on an agency until amended by such agency. A guidance document does not include internal procedural documents that only affect the internal operations of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules and regulations made in accordance with the Administrative Procedure Act. If you believe that this guidance document imposes additional requirements or penalties on regulated parties, you may request a review of the document.

## Personnel Training Requirements for Large Quantity Generators

[Title 128 – Nebraska Hazardous Waste Regulations](#) requires all large quantity generators to provide and have record of employee training on the Resource Conservation and Recovery Act. [49 CFR §172.700-704](#) requires additional training on Department of Transportation (DOT) requirements. Employees who will handle or be involved with hazardous waste management should be included in these trainings.

Large quantity generators are required by reference in Title 128, Chapter 10, Section 004.01H to adhere to [Chapter 19 – Personnel Training](#).

### Training Requirements

- Training may be sourced from third party vendors or developed in house. Training must be taught by an instructor who is trained in hazardous waste management and teaches personnel hazardous waste management procedures relevant to their positions. Training should be directed to ensure personnel are able to respond effectively to emergencies and should include, where applicable:
  - Contingency plan training
  - Procedures for inspecting, repairing, and replacing emergency and monitoring equipment
  - Key parameters for automatic waste feed cut-off systems
  - Communications or alarm systems
  - Response to fires or explosions
  - Shutdown of operations
- Within 6 months of hire or new position assignment, training must be completed. Employees should not work unsupervised until training has been completed. Annual training should be completed as needed.
- Who specifically needs training?
  - Any personnel responsible for hazardous waste management.
  - This may include personnel who work in the 90-day accumulation area, are on the emergency coordinator list, perform spill clean-up, transport hazardous waste through the facility, or are working in the central accumulation areas.
  - Employees adding waste to satellite accumulation containers or working in the vicinity of satellite accumulation containers are not required to be trained in

hazardous waste management or have training records kept on site, although the facility may opt to as internal operating procedure.

## Training Records

- The generator must maintain the following documents and records at the site:
  - The job title for each position as it relates to hazardous waste management.
    - The job title for hazardous waste management may not match the title for which the employee was originally hired. For example, a Maintenance Worker 1, who consolidates satellite accumulation containers could have a secondary title of Hazardous Waste Consolidator. Only the title as related to hazardous waste management needs to be included for training documentation purposes.
  - The job description for each position – this must include the requisite skill, education, or other qualifications and duties of personnel assigned.
    - The description of an employee’s job related to hazardous waste management may not match the title for which the employee was originally hired. Following the example above, the maintenance worker might mostly work on equipment on site but additionally helps with hazardous waste consolidation. Only the description of the employee’s job as related to hazardous waste management needs to be included for training documentation purposes.
  - The name of each employee filling the positions.
  - A written description of the type and amount of both introductory and continuing training that will be given to each employee with hazardous waste management duties.
  - Records that document the training or job experience required have been completed by the facility personnel.
- Training records for current employees should be available for every year they have been employed. Training records for each employee must be kept for three years after termination of employment.

## Example

An example table has been provided on the next page to show one potential for how training documentation can be recorded. Facilities may opt to keep hard copy records rather than holding records electronically. Your records do not have to match exactly what is shown below, but all information listed above must be readily available.

Employee Name	Hire Date	Job Title	Job Description	Initial Training	Training Records	Termination Date (if applicable)
Current employee A	5/7/2018	Floor Worker 1; Hazardous Waste Consolidator	The Hazardous Waste Transitioner is responsible for transporting satellite accumulation containers when they are full to the 90-day storage area. 24-hour HAZWOPER and in house training required.	6/1/2018	6/1/2018, 6/7/2019, 6/8/2020, 5/2/2021, 6/1/2022, 5/7/2023	
Current employee B	1/6/2022	Environmental Supervisor; Hazardous Waste Coordinator	Current Emergency Coordinator. The Hazardous Waste Coordinator is responsible for weekly inspections of 90-day storage areas. They may help move satellite containers to the 90-day area as needed. 40-hour HAZWOPER and in house training required.	3/5/2022	3/5/2022, 5/7/2023	
Ex-Employee A	6/26/2020	Floor Worker 2; Hazardous Waste Packer	The Hazardous Waste Packer is responsible for organization of the 90-day accumulation area and coordinating pick up of waste with the transporter. They sign off on manifests and monitor receipts to ensure waste was received by the TSDF within 45 days. 24-hour HAZWOPER and in house training required.	9/8/2020	9/8/2020, 5/2/2021, 6/1/2022	9/8/2022

**Training Description:** Training is provided in house by the company's corporate environmental team. Initial training is four hours and covers the facility's contingency plan, key plant shut off points, locations of fire extinguishers, sprinklers, emergency telephone locations, spill kits, and what to do if spills or other emergencies occur. Initial training also covers RCRA, hazardous waste management best practices, and how to prevent accidents. Annual training is two hours long and provided by the company's corporate environmental team. A refresher of initial training is provided and is followed by potential emergency situations related to plant operations to help prepare employees.

## **RESOURCES:**

- NDEE Home Page: <http://dee.ne.gov/>
- Federal Code of Regulations: <https://www.ecfr.gov/>

### Contacts:

- NDEE Waste Compliance Environmental Assistance Coordinator (402) 471-8308
- NDEE Waste Compliance Section / NDEE main number (402) 471-2186
- NDEE Toll Free Number (877) 253-2603
- Email questions to: [ndee.moreinfo@nebraska.gov](mailto:ndee.moreinfo@nebraska.gov)

### NDEE Publications:

Title 128 – [Nebraska Hazardous Waste Regulations](#)

*Titles are available on the NDEE Home Page under “Laws/Regs & EQC”, “Rules & Regulations”*