



# Hazardous Waste Training

## Small Quantity Generators

Reviewed/Revised November 2019

### Requirements

Pursuant to section 262.16(b)(9) of the Colorado Hazardous Waste Regulations, 6 CCR 1007-3 (the regulations), small quantity generators (SQGs) of hazardous waste must provide hazardous waste training to all employees involved in the management of and/or documentation of hazardous waste activities. Additionally, in Colorado, SQGs must document and maintain hazardous waste training records for all current employees.

### Training components

The hazardous waste training provided to each employee must focus on the regulations applicable to individual job responsibilities during normal facility operations and emergencies. In general, any employee that generates hazardous waste, places it in containers, works in close proximity to an area where hazardous waste is generated or stored, conducts weekly inspections, acts as the emergency coordinator, signs hazardous waste shipping manifests, and/or is involved with hazardous waste recordkeeping, should receive hazardous waste training. Examples of topics that should be included in an SQG's hazardous waste training program include:

- Hazardous waste identification and determination.
- “Cradle-to-grave” responsibility (i.e., from the moment it is generated at your facility until its ultimate disposal).
- Hazardous waste accumulation area quantity/time limits (central/satellite).
- Hazardous waste container and tank management.
- Proper labeling of hazardous waste containers and tanks.
- Aisle space.
- Hazardous waste compatibility.
- Hazardous waste weekly inspection requirements.
- Hazardous waste manifest requirements.
- Land disposal restriction (LDR) forms.
- Hazardous waste generator recordkeeping requirements.
- “Used Oil” labeling and management.
- Emergency coordinator contact information.
- Emergency coordinator phone postings.
- Emergency response procedures, including alarms and evacuation routes.
- Use of emergency response equipment.
- Spill cleanup.
- Arrangements with local emergency response authorities (e.g. fire department, police department, local health department, local hospitals and emergency response teams).

SQGs have the flexibility to provide each employee with their own unique hazardous waste training that is specifically tailored to their job responsibilities. Table 1 attached to this guidance document sets forth examples of common employee positions that exist at SQGs and the specific topics on which they may be required to receive training.

### Emergency response training

All facility personnel, regardless of their position, should have emergency response training so they can respond effectively in an emergency involving hazardous waste. At a minimum, all employees should receive training in emergency response procedures including internal communications/alarms and

evacuation procedures. For example, if there is an evacuation due to volatilization of spilled hazardous waste, most of the employees will be responsible for vacating the premises in a predetermined manner. Other properly trained employees will be responsible for containing the spill, informing local officials, using firefighting equipment, etc. All employees should be trained to know who the emergency contact for the facility is and when and how to contact them in the event of an emergency.

## Performance-based

SQGs are responsible for ensuring their employees are properly implementing the hazardous waste training they have received and are performing their job duties in compliance with the applicable regulations. Facilities unable to demonstrate performance-based compliance with the regulations may be in violation of the training requirements set forth in the regulations. For example, if during a hazardous waste compliance evaluation inspection, an inspector observes multiple hazardous waste management violations, the facility may be cited for failing to have adequate hazardous waste training, even if facility records indicate employees have been trained in these areas.

Hazardous waste training for an SQG is only required to be a one-time activity for each employee. However, annual refresher classes are strongly recommended to ensure all facility personnel are aware of their responsibilities as they relate to management of hazardous waste and emergency response.

## OSHA training

Many facilities are also required to comply with the Occupational Safety and Health Administration's (OSHA) hazardous waste training requirements (e.g., HAZWOPER, hazardous communication, personal protective equipment, etc.). Although various aspects of OSHA training may overlap with Colorado's hazardous waste training requirements, OSHA training alone typically does not meet all of the necessary Colorado specific requirements for hazardous waste training.

## Recordkeeping

Documentation of employee training is required. To prove compliance with the training requirements, the Division suggests SQGs develop and keep on file a written training plan that includes a roster of employee names, dates of training and employee signatures that documents when training was completed. SQGs must maintain employee training records on-site for all current employees. An example of a general training roster that includes various hazardous waste training topics is included in Table 2 attached to this guidance document. This training roster can be modified to reflect the type of hazardous waste training provided to your employees.

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## For more information

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Table 1

## Example personnel training requirements for small quantity generators of hazardous waste\*

Training element	Generic job category							
	Environmental manager (1)	Recordkeeper (2)	General office personnel (3)	Production supervisor (4)	Maintenance supervisor (5)	Haz. waste technician (6)	Plant worker (Generator) (7)	General plant worker (8)
Hazardous waste regulations	Y							
Making waste determinations	Y					Y		
Properties of facility wastes	Y	Y			Y	Y	Y	
Waste Minimization	Y	Y		Y	Y	Y	Y	Y
Recordkeeping	Y	Y				Y		
Accumulation (satellite / central)	Y	Y		Y	Y	Y	Y	
Container and tank management	Y				Y	Y	Y	
Inspections	Y	Y			Y	Y	Y	
Waste packaging procedures	Y				Y	Y		
Pre-transportation (manifests, labels)	Y	Y				Y		
Emergency response procedures	Y			Y	Y	Y	Y	
Emergency equipment use, inspection, repair	Y				Y	Y		
Communications and alarms	Y	Y	Y	Y	Y	Y	Y	Y
Evacuation routes	Y	Y	Y	Y	Y	Y	Y	Y
Response to fire, explosion, and groundwater contamination incidents	Y			Y	Y	Y	Y	

**Table 1**

**Example personnel training requirements for small quantity generators of hazardous waste\***

\* Training requirements for a hypothetical manufacturing facility. This table has been developed to be representative of an average facility. Job categories and associated training requirements will be specific to each facility and may not be identical to those presented in this table.

- 1) Responsible for the overall hazardous waste management functions at the facility.
- 2) Responsible for hazardous waste paperwork and recordkeeping functions. Has no direct contact with physical hazardous waste activities.
- 3) General administrative and clerical personnel. No responsibilities related to hazardous waste management.
- 4) Responsible for production activities at the facility. Supervises staff that are hazardous waste generators.
- 5) Responsible for maintenance activities at the facility. Supervises staff that are hazardous waste generators and has some environmental management responsibilities.
- 6) Responsible for some hazardous waste management functions. Performs physical waste activities (e.g., moving and labeling containers, collecting samples, etc.)
- 7) Generates hazardous waste as part of production process. May utilize a satellite accumulation container.
- 8) Generates no hazardous waste and has no direct contact with physical hazardous waste activities as part of the production process.

