

# Chapter 7

## Training, Inspections, and Recordkeeping

“☞” - Indicates that a more restrictive state rule or regulation may exist for particular federal regulation. Reference the units' physical location (state) within the CEU Supplement for further guidance.

This chapter gives information, instructions, and forms for required training, periodic internal inspections, and recordkeeping.

<b>Section</b>	<b>Page</b>
7.1 Required Training	7-1
7.2 RCRA HW Management Training	7-2
7.3 HM Training	7-3
7.4 Training Records	7-4
7.5 Inspections	7-4
7.6 Recordkeeping	7-5
7.7 Reporting	7-6
7.8 Forms and Instructions	7-6

### 7.1 Required Training

The following EPA, DOT, and OSHA regulations require that all persons working with or transporting HM and/or HW be properly trained:

- RCRA HW Management (EPA): 40 CFR 265.16 requires that facility personnel successfully complete classroom or on-the-job ☞ training that teaches them to perform their duties to ensure that the facility is compliant with RCRA.
- Hazardous Materials Management (DOT): 49 CFR 172.704 requires that employees handling HM undergo general awareness/ familiarization training, function-specific training, and safety training.
- HM Transportation (DOT): 49 CFR 177.800 and .816 requires that drivers of HM be properly trained in safety and vehicle operation.
- HW Operations and Emergency Response (HAZWOPER) (OSHA): 29 CFR 1910.120 (q)(6) requires the appropriate level of training for employees who are expected to participate in cleaning up HM.

- Hazard Communication (HAZCOM) (OSHA): 29 CFR 1910.120(h) requires facilities to train their employees about the hazardous chemicals to which they are exposed.

## 7.2 RCRA Hazardous Waste Management Training

Note USCGR personnel handling or responsible for managing HW must complete ☞ training requirements before they can work in waste management positions unsupervised.

### Unit Hazardous Material and Waste Coordinators

Unit Hazardous Material and Waste Coordinators are appointed by their Unit Commander to ensure that the unit is adhering to all environmental requirements, including HW management regulations.

Note Unit Hazardous Material and Waste Coordinators must successfully complete a ☞ HW training course.

This course should be conducted or arranged by the respective CEU. The training must describe proper handling and ☞ emergency procedures appropriate to the type(s) of HW generated by the activity, as well as information on how to comply with environmental federal, state, local, and USCG regulations.

Training should address the following areas:

- Regulations governing generation, storage, and transport of HW
- Identifying and classifying HW
- Establishing and maintaining HW accumulation sites
- Packaging and labeling tanks and containers of HW
- Inspection procedures
- Recordkeeping
- Completing applicable forms
- Preventing and responding to spills (including PPE)

Unit Hazardous Material and Waste Coordinators must complete their training before they take over their duties, and must attend an ☞ annual/semiannual refresher course thereafter.

### Other Hazardous Waste Management Personnel

Unit Hazardous Material and Waste Coordinators must ensure that personnel who handle or manage HW and HM receive required training on HW management procedures identified

within this plan (including emergency response procedures). Initial training should be provided within six months of employment or assignment. In addition, there must be an annual training review, and refresher training if necessary.

This training may be accomplished in the classroom (e.g., by holding monthly shop meetings) or on-the-job. Regardless of where it is performed, it should be recorded and documented in the facility's training records.

**Note** Employees newly assigned HW handling responsibilities must be supervised by trained personnel until the new employee can receive formalized training.

### **Hazardous Waste Transporters**

Persons transporting HW must have the following DOT training:

- Initial training on packaging, labeling, and marking HM
- Preparing shipping papers and placarding
- Preparing manifests
- Packaging HW
- Refresher training at least once every three years

**Note** Each unit and shop should maintain a roster listing personnel who are allowed to transport HW and HM.

## **7.3 Hazardous Material Training**

HM personnel must successfully complete general awareness and familiarization training, function-specific training, and safety training upon assignment and annually thereafter.

### **Hazardous Material Transportation**

Persons who transport, load, or unload HM must have the following DOT training:

- Initial training on packaging, labeling, and marking HM
- Preparing shipping papers and placarding
- Biennial refresher training

### **Hazard Communication**

Persons who work with chemicals on the job are required by OSHA to have "Hazard Communication" or "Worker-Right-to-Know" training. Training is required:

- At initial job assignment

- Whenever hazards change (e.g., a significant change in mission may have a major affect on the types and quantity of HM used and stored)
- Biennially thereafter

This training should be consistent with the USCG Hazardous Material Communications Program.

## Emergency Response

Persons assigned to the Installation Emergency Response, Spill Response, or HM teams are required to have annual training. This training may include the following topics:

- Proper use of PPE
- Use of emergency equipment
- First aid
- Use of communications and alarm systems
- Emergency notification procedures and emergency actions
- Response to fire and explosion
- Shut-down procedures
- Decontamination procedures

Note	Training requirements vary depending on assigned duties or levels of response and are detailed in the Spill Prevention Control and Countermeasure Plan (if applicable). Requirements may include annual training exercises.
------	---

## 7.4 Training Records

Every facility is required to keep training records for each person handling HW and HM. Records also must be kept for each class training class conducted at the facility. Retain these records for three years at the facility. See the following training forms in the “Forms and Instructions” section of this chapter:

- Hazardous Waste and Hazardous Materials Training Record
- Facility Hazardous Waste and Hazardous Materials Training Record

## 7.5 Inspections

All USCG activities are subject to external inspections by the CEU Environmental Office and by state and federal regulatory agencies. Local governments may also inspect for compliance with permits, local codes, or other regulations. In the event of an external inspection, immediately notify the CEU by telephone and forward copies of all

correspondence related to the inspection. Keep any records of these inspections in the hazardous waste management binder (see the “Hazardous Materials and Hazardous Waste Management Binder” section in this chapter for more information).

All USCG activities must conduct and record self-inspections of HW accumulation areas, SAPs, and HM storage areas. At a minimum, these inspections should be weekly. These inspections are described in this section.

A blank Hazardous Materials/Hazardous Waste Weekly Inspection Log is provided in the “Forms and Instructions” section at the end of this chapter. It may be reproduced at the user level. The current checklist will be kept in a document protector in the HW storage building until filled. Completed inspection checklists will be retained in the hazardous waste management binder for three years and then transferred to an inactive file.

All discrepancies found during inspections will be reported through channels to the HW Management Specialist.

## **7.6 Recordkeeping**

Unit Hazardous Material and Waste Coordinators must ensure that all necessary HW and HM records, plans, and files for their unit or facility are prepared, maintained, and updated.

### **Hazardous Materials and Hazardous Waste Management Binder**

Each generator and transporter will maintain a hazardous waste management binder. The binder will be clearly labeled and contain the following:

- Completed Hazardous Materials Storage Inventory Sheets
- Completed Hazardous Waste Document Registers
- DD Form 836s or equivalent shipping documents
- Completed Waste Accumulation Inventory Logs
- Completed Hazardous Materials/Hazardous Waste Weekly Inspection Log
- Completed Hazardous Waste and Hazardous materials Training Records
- Completed Facility Hazardous Waste and Hazardous Materials Training Reports

### **Hazardous Waste Manifest File**

**Note** Individual copies of completed HW Manifests and LDNFs must be maintained in a separate, active HW Manifest File by the generator for a period of no less than three years.

Manifests should be filed by the calendar year. It is the policy of the USCG that all manifests and records concerning hazardous waste will be maintained indefinitely. Files from previous years will be kept in inactive files.

## **7.7 Reporting**

All units and facilities may be required to submit reports (with supporting data) to the CEU upon request. The reports may include copies of all inventory logs, training records, and HW turn-in documents for the previous calendar year. These reports will enable the CEU's to compile the hazardous waste ➡ biannual reports required by the requesting enforcement regulatory agency.

## **7.8 Forms and instructions**

This section contains the following forms and instructions:

- Hazardous Waste and Hazardous Materials Training Record
- Hazardous Waste and Hazardous Materials Training Report
- Hazardous Material/Hazardous Waste Weekly Inspection Log



This page intentionally left blank.



This page intentionally left blank.

### Hazardous Materials/Hazardous Waste Weekly Inspection Log

**Facility Name:** \_\_\_\_\_

**Hazardous Material Storage/Waste Accumulation Building/Room #:** \_\_\_\_\_

Inspect Hazardous Materials Storage/Waste Accumulation Consolidation Site and ensure that:

1. All containers are tightly closed (lids, bung plugs, and boxes).
2. All containers have a Hazardous Waste label marked with contents and accumulation start date.
3. All accumulation start dates are within required time limits of the generator status.
4. Appropriate signage is posted on the outside of the Hazardous Materials Storage/Hazardous Waste Accumulation Building.
5. Labels are visible and adequate aisle space is present (4 drums/pallet, labels to outside, 4 feet between pallet rows).
6. All containers of hazardous material have in date shelf life.
7. All containers are free of severe corrosion, bulges or damage. If not, transfer contents to a new container.
8. No leaking containers.
9. All containment systems are free of cracks or severely eroded areas. If not, schedule to repair promptly.
10. All containment systems are free of spilled wastes or rainwater. Rainwater must be removed within 24 hours.

**IMMEDIATELY CORRECT ANY DEFICIENCIES. If the deficiency cannot be immediately corrected, note the deficiency below and notify the Unit Hazardous Materials and Waste Coordinator. Once the correction is made, record the Date Corrected.**

**If immediate corrections are made or no corrections are required, date and initial the next available line.**

DATE	INSPECTORS INITIALS	DEFICIENCIES	DATE CORRECTED
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

This page intentionally left blank.