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OSHA Training Under RCRA

The Resource Conservation and Recovery Act (RCRA) was passed by Congress in 1976 to regulate how to dispose of waste. The federal government was pressured to develop a national policy regarding the handling of hazardous waste. RCRA is the regulatory statute designed to provide "cradle-to-grave" control of hazardous waste by imposing management requirements on generators and transporters of hazardous wastes, and upon owners and operators of treatment, storage and disposal (TSD) facilities.

For the purpose of this article, I am going to concentrate on the training requirements for the OSHA Standard

29 CFR 1910.120 Hazardous Waste Operations and Emergency Response (HAZWOPER). Could one of your employees encounter an emergency release of a hazardous substance at your metal finishing operation? If so, has this employee been trained to respond, or been assigned to perform particular emergency response duties? If this is the case, you may be subject to regulation under the HAZWOPER regulation 29 CFR 1910.120. This regulation established standards for company preparedness and employee training standards for persons performing tasks involving hazardous substances. The specific activities covered by this standard include:

1. Emergency response to hazardous substance releases,
2. Work at sites where hazardous wastes are being cleaned up or controlled, or
3. Routine work at an RCRA-permitted hazardous waste TSD facility.

Each of the three categories of regulation mentioned here has a corresponding set of training requirements. Workers at hazardous waste sites—such as Superfund clean-up sites—must receive 40 hours of specified training. Workers performing routine operations at TSD facilities must receive 24 hours of specified training. Workers at metal finishing firms must receive training that corresponds with the employee's role in an emergency. The rule specifies five levels of training for members of an emergency response team, down to an unspecified amount of awareness training for persons who may simply encounter an emergency

and make a call for help, or need to evacuate the premises.

In August 1994, OSHA issued non-mandatory *Appendix E—Training Curriculum Guidelines*, which provides detailed information that can be used in the development of a HAZWOPER training program. Suggested general criteria for a site-specific HAZWOPER training curriculum should include:

1. *Training Facility.* The training facility should have available sufficient resources, equipment and site locations to perform instructive and hands-on training when appropriate.
2. *Training Director.* Each training program should be under the direction of a training director who is responsible for the program. The training director should have a minimum of two years' employee education experience.
3. *Instructors.* Instructors should be deemed competent on the basis of previously documented experience in their areas of instruction, successful completion of a "train-the-trainer" program specific to the topics they will teach, and an evaluation of instructional competence by the training director.
4. *Course Materials.* The training director should approve all course materials to be used by the training provider. Course material should be reviewed and updated at least annually.
5. *Students.* The program for accepting students should include:
 - a. Assurance that the student is or will be involved in work

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- where chemical exposures are likely, and that the student possesses the skills necessary to perform the work.
- b. A policy on the necessary medical clearance.
6. *Ratios*. Student-instructor ratios should not exceed 30 students per instructor.
7. *Proficiency Assessment*. Proficiency should be evaluated and documented by the use of a written assessment and a skill demonstration selected and developed by the training director and training staff.
8. *Course Certificate*. Written documentation should be provided to each student who satisfactorily completes the training course. The documentation should include:
- a. Student's name
 - b. Course title
 - c. Course date

- d. Statement that the student has successfully completed the course.
 - e. Name and address of the training provider.
 - f. An individual identification number for the certificate.
 - g. List of the levels of personal protective equipment (PPE) used by the student to complete the course.
9. *Recordkeeping*. Training providers should maintain records listing the dates courses were presented, the names of the individual course attendees, the names of those students successfully completing each course, and the number of training certificates issued to each successful student.
10. *Program Quality Control*. The training director should contact or direct an annual written audit of the training program.

The information provided here gives just a brief overview of some very comprehensive training requirements. It is recommended that you contact your nearest OSHA office or study the various regulations to see how the training requirements may affect your facility. **P&SF**

About the Columnist
John A. Stevenson, CEF, is the director of process control and safety at Anoplate Corporation in Syracuse, NY. He holds an AAS in electroplating and metal finishing from Triton Community College, River Grove, IL, and a BS in managing in a technical environment from Empire State College SUNY. He is a member of AESF's OSHA Committee, an officer of the Syracuse Branch and an active member of the Safety Council of Central New York.