CHAPTER 10
TRAINING

This chapter answers the following questions about environmental training:
- Why is training needed?
- What environmental training is required?
- What training classes should you take and who provides the training?

10.1 The Need for Training

It is the policy of the U.S. government that federal agencies conduct their environmental, transportation, and energy-related activities under the law in support of their respective missions in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and sustainable manner. Each head of a federal agency is responsible for establishing programs to implement this policy, including programs for environmental management training.

Training helps individuals perform their jobs properly, and is required to ensure the organization fulfills its commitments to comply with applicable legal and other requirements, maintain operational control, and achieve its mission.

An essential part of managing and operating your facility is keeping up with changing environmental regulations and safety practices. One of the easiest ways to stay current is to take training classes. Certainly, training can help you stay familiar with the ever-changing Code of Federal Regulations, Federal Registers, Presidential Executive Orders, Department of Defense (DoD) directives, and other requirements.

The Defense Logistics Agency (DLA) has established a framework and provided guidance to DLA commanders, managers, supervisors, and personnel specialists to make sure the DLA workforce is properly trained. Their guidance includes the Environmental Hazardous Material/Hazardous Waste (HM/HW) Training Plan, and the DLA Safety and Occupational Health Training Plan. These plans are designed to help facility commanders, managers, supervisors, and personnel specialists identify specific environmental training for employees, identify appropriate training courses, and keep training records.

The Environmental HM/HW Training Plan identifies specific training classes for each job function at depots, supply centers, service centers, and overseas installations. Workforce training classes are designed for three basic categories: environmental awareness for the general workforce, environmental awareness for non-environmental managerial functional areas, and environmental HM/HW employees who require more than awareness training. Environmental HM/HW employees, commanders/directors, and certain non-environmental managers/employees are assigned skill codes. Skills codes represent assigned duties and responsibilities and identify minimum training requirements.

Your employees must be aware of physical and chemical hazards in the workplace. Safety Data Sheets are to be readily available (29 CFR 1910.1200).

You must develop and implement an oil spill response training program, consisting of exercises and drills, if your facility is required to have a Facility Response Plan under OPA 90 (per 33 CFR 154.1050, 40 CFR 112.7[f], 40 CFR 112.21, 49 CFR 130.31, 49 CFR 194.117, and 49 CFR 195.403).

Employees that load, unload, transport, or handle hazardous materials must attend training on DOT shipping regulations (49 CFR 172 Subpart H).

Varying levels of training are also required for employees involved with hazardous waste management (40 CFR 265.16), universal waste management (40 CFR 273.16 and .36), stormwater management (per permit requirements), UST compliance (per Energy Policy Act of 2005), and various other environmental activities.
requirements. Courses are assigned a course identification number, including courses required by regulation (R/500 series), required refresher courses (R/600 series), and training implied by regulation but not explicitly required (R/700 series). Supervisors assign skill codes within 10 days for new or reassigned employees with environmental duties related to hazardous materials and hazardous waste. The Training point of contact (POC) approves assigned skill codes, and the supervisors initiate training requirements in accordance with local procedures and training class schedules prepared by the Training POC.

10.2 Regulatory Training Requirements

The following sections summarize the environmental and related training requirements of various regulations that may be applicable to your facility. Specifically, this chapter summarizes training requirements for:

- Educating employees on workplace hazardous chemicals
- Responding to hazardous substance spills and cleanup
- Implementing facility response plans
- Complying with the Spill Prevention, Control, and Countermeasure (SPCC) rules
- Preventing stormwater pollution
- Managing hazardous and universal wastes
- Transporting hazardous materials
- Operating underground storage tanks (USTs)
- Recognizing environmental impacts, targets and objectives

You may also need to become familiar with other federal and state laws and regulations with applicable training requirements.

10.3 Hazard Communication Standard

The Hazard Communication Standard (sometimes called HAZCOM) is based on a simple idea—you have a need and a right to know about the chemicals you may be exposed to in the workplace, the hazards of those chemicals, and how to protect yourself from exposure (see Title 29 of the Code of Federal Regulations, Part 1910.1200 [29 CFR 1910.1200]). This standard aligns with the United Nation’s Globally Harmonized System of Classification and Labeling of Chemicals.

As an employer, you must provide employees with information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever the chemicals or hazard change. You must inform employees of:

- The Hazard Communication Standard and its requirements
- Operations in their work area if hazardous chemicals are present
- Location and availability of the following:
  - Written hazard communication program
  - Lists of hazardous chemicals
  - Safety data sheets (SDSs)

Employee training must include the following:

- Methods and observations that may be used to detect the presence or release of a hazardous chemical
- Physical and health hazards of the chemicals in the work area
- Measures employees can take to protect themselves from these hazards
Details of the hazard communication program developed for your facility, including how to read and interpret information on labels and SDSs, and how to obtain and use the appropriate hazard information.

The DLA Environmental HM/HW Training Plan states that Hazard Communication and emergency response training should be scheduled first for a new employee, whenever possible. In addition to the safety issues involved, these courses serve as the foundation for environmental HM/HW training. For more information, refer to the Hazard Communication Program for your installation.

10.4 Emergency Response and Spill Cleanup (HAZWOPER)

Personnel asked to clean up or respond to spills of hazardous-substances must be trained under Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations. These are health and safety requirements of the Occupational Safety and Health Administration (OSHA), listed in 29 CFR 1910.120. Hazardous substances include those listed in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (at 40 CFR 302.4), U.S. Department of Transportation (DOT) hazardous materials (at 49 CFR 172.101), Resource Conservation and Recovery Act (RCRA) hazardous waste (at 40 CFR 261), and any biological or disease-causing agents causing harm to persons or their offspring.

Small, incidental spills on land where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area or maintenance personnel do not generally require HAZWOPER emergency response training. However, personnel would require at a minimum training in HAZCOM and using personal protective equipment, as well as proper disposal of waste materials (waste management). It is worth noting that even small spills of oil into surface water require response and notification (see Chapter 2, Incident and Spill Reporting).

If you have employees (or hire contractors) whose roles and responsibilities include responding to spills (or even threatened releases) of hazardous substances where there is a potential for fire, explosion, chemical exposure, or other health or safety hazards, you must provide training that complies with the requirements of 29 CFR 1910.120(q). Employees must be trained before they can participate in an actual emergency and must receive annual refresher training. The training must be based on the duties and function to be performed by each responder. The skill and knowledge levels for emergency response employees are as follows:

- **First responder awareness**: includes personnel likely to witness or discover a spill, recognize emergency situations, initiate an emergency response sequence, and evacuate.
- **First responder operations**: includes personnel who respond by taking defensive actions to protect nearby persons, property, or the environment (for example, contain the release from a safe distance, keep it from spreading, and prevent exposures) without trying to stop the release.
- **Hazardous materials technician**: includes personnel who assume a more aggressive role to stop the release.
Hazardous materials specialist: personnel with more specific knowledge of the substances, or personnel who act as the site liaison with federal, state, local, and other government authorities.

On-scene incident commander: personnel who assume control of the incident scene, including the installation’s incident command system.

Training requirements for each response level are provided in the regulation. Training curriculum guidelines are provided in Appendix E to 29 CFR 1910.120.

10.5 Emergency Response Plans

Under the Oil Pollution Act of 1990 (OPA 90), you may be required to prepare one or more of the following response plans if your facility could cause substantial harm to the environment by discharging oil into or on navigable waters:

- U.S. Environmental Protection Agency (EPA) Facility Response Plan (40 CFR 112.20)
- U.S. Coast Guard (USCG) Marine Transfer-Related (MTR) Facility Response Plan (33 CFR 154)
- DOT Pipeline and Hazardous Materials Safety Administration (PHMSA) Pipeline Response Plan (49 CFR 194)

These plans prepare facility personnel to respond to an oil spill (see Chapter 1, Environmental and Emergency Response Planning). If you are subject to any of the above regulations, you must develop and implement a response training program and a drill/exercise program for your facility. All personnel involved in oil spill response activities must be trained in oil spill response procedures and in applicable oil spill response laws, rules, and regulations. This response training protects the safety of workers, and prevents or reduces the environmental and economic effects of a spill.

Your training program should be based on the Training Reference for Oil Spill Response manual, developed by EPA, USCG, PHMSA, and the U.S. Department of Interior (DOI) Bureau of Safety and Environmental Enforcement (BSEE) (formerly Minerals Management Service [MMS]) to help facilities meet their regulatory responsibilities. The manual provides general guidelines that may be catered to your specific response training requirements. Training guidelines are provided for each of the following key individuals or groups of people required to be identified in response plans, as well as for worker health and safety:

- Qualified Individual (QI)
- Spill management team
- Vessel personnel
- Facility personnel
- Oil spill removal organizations (OSROs)

Your drill or exercise program should also follow the National Preparedness for Response Exercise Program (PREP) Guidelines. Completing the PREP exercises satisfies the response exercise requirements for all response plans under OPA 90.

Based on the PREP Guidelines, you must conduct internal and external exercises. Internal exercises are conducted within your organization. External exercises extend beyond your organization and involve other members of the response community. Internal training programs for MTR facilities require both announced and unannounced training exercises covering the following minimum exercise requirements:

- QI notification exercises (annually during non-business hours)
Emergency procedures exercises (quarterly for vessels and optional for facilities with cargo transfer activities)

Spill management team tabletop exercises (annually, with a worst-case scenario at least once every 3 years)

Equipment deployment exercises (semiannually for facility owned and operated equipment, and annually for oil spill removal organization equipment)

External exercises include area exercises and government-initiated unannounced exercises. Area exercises are designed to exercise the entire response community in a particular area. All area exercises are developed by a team of representatives from federal, state, and local governments and industry. Participation in an area exercise lets you test your response plans and systems before an actual emergency. EPA, USCG, PHMSA, and BSEE develop and publish a proposed area exercise schedule.

10.6 Spill Prevention, Control, and Countermeasure Plan

The SPCC regulations of 40 CFR 112 require training for personnel handling oil and petroleum products. If your facility is subject to the SPCC regulations, you must develop a program to train personnel involved in oil spill response activities and include, at a minimum:

- Procedures to respond to discharges of oil
- Operation and maintenance of equipment to prevent the discharge of oil
- Applicable oil spill response laws, rules, and regulations
- SPCC Plan contents

The training program should include annual discharge prevention briefings for oil-handling personnel to ensure adequate understanding of general facility operations and the contents of the SPCC Plan. In addition, you may develop specific lesson plans relevant to facility personnel and implement a program of facility response drills and exercises based on PREP.

10.7 Stormwater Pollution Prevention Plan

EPA and state National Pollution Discharge Elimination System (NPDES) individual, general, and Multi-Sector General Permits (MSGP) require that qualified, trained personnel be responsible for implementing activities identified in the installation’s Stormwater Pollution Prevention Plan (SWPPP). The purpose of the training is to make sure that personnel understand the contents of the SWPPP and have the expertise to conduct facility inspections, stormwater monitoring and sampling, and reporting per the NPDES permit. The training also ensures that personnel have the tools necessary to implement and/or revise the contents of the SWPPP based on inspections, observations, sampling results, and/or audits.

Per the stormwater permit, qualified personnel are those who possess the knowledge and skills to assess conditions and activities that could impact stormwater quality at your facility, and who can also evaluate the effectiveness of control measures. At a minimum, the training must take place annually. Employee training must address the following items applicable to your facility:

- Summary of the facility’s SWPPP requirements
Stormwater outfall locations and general industrial activities draining to the outfalls
Used oil management
Spent solvent management
Hazardous material handling and storage
Spill prevention, response, and control
Fueling procedures and fuel storage
Good housekeeping practices
Best management practices (BMPs)
Proper painting procedures
Used battery management

The SWPPP training requirements may be fulfilled by a series of in-house training sessions conducted by the pollution prevention team leader and other knowledgeable individuals. See Chapter 9, Wastewater and Stormwater, for more information about the SWPPP.

10.8 Hazardous Waste

Training requirements for small quantity generators (SQGs) and large quantity generators (LQGs) of hazardous waste are outlined in 40 CFR 262.34 and 40 CFR 265.16. Note that if you are a conditionally exempt small quantity generator (CESQG) and NOT a small or large quantity generator/handler of universal waste, you are not required to have training. Although training is not required for CESQGs, many organizations provide basic instruction on what types of hazardous wastes are generated for worker awareness. For information on hazardous waste generator classifications and universal waste, see Chapter 7, Hazardous and Recycled Waste.

10.8.1 Large Quantity Generators

Within 6 months of employment or assignment to your facility, or to a new position at your facility, employees that handle hazardous waste as part of its generation, storage, or shipping must complete a program of classroom instruction or on-the-job training in hazardous waste management procedures. The program must be directed by a person trained in hazardous waste management procedures, and must include job-specific hazardous waste management procedures (including contingency plan implementation). The program must also include emergency procedures, equipment, and systems, including where applicable:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Key parameters for automatic waste feed cut-off systems
- Communications or alarm system
- Response to fires or explosions
- Response to groundwater contamination incidents
- Shutdown of operations
Until training is completed, prohibit personnel from working unsupervised in the vicinity of hazardous waste. Provide annual refresher training for all facility personnel whose jobs require that they handle hazardous waste and for those who work near it. Keep personnel training records until the facility is closed or, for personnel who have left your facility, for at least 3 years from the date they last worked. The written training records must describe the initial and refresher training provided and include a job description for each position related to hazardous waste management.

**10.8.2 Small Quantity Generators**

As an SQG, you are exempt from the written hazardous waste training and associated recordkeeping requirements of LQGs. However, you must ensure that all employees are trained in waste handling and emergency procedures relevant to their job responsibilities.

**10.9 Universal Waste**

EPA established less strict requirements for certain hazardous wastes that are recycled. These “universal wastes” consist of batteries, recalled and unused pesticides, lamps (for example, fluorescent and high intensity discharge light bulbs), and mercury-containing equipment (for example, electric relays, monometers, tilt switches, and thermostats). Both small quantity handlers and large quantity handlers of universal waste must provide training (40 CFR 273.16 and 273.36, respectively). Employees who handle universal waste or are responsible for universal waste operations should receive training on the proper handling and emergency procedures for the universal waste that they manage. For large quantity handlers, training should be based on the employee responsibilities during normal facility operations and emergencies.

**10.10 Hazardous Materials Transportation**

The transportation regulations of 49 CFR 172 includes training and testing requirements for personnel involved in hazardous materials transportation (referred to as hazmat employees). Examples of hazmat employees include workers who:

- Prepare hazardous materials for transportation, including preparing manifests
- Load, unload, or handle hazardous materials
- Operate a vehicle used to transport hazardous materials

The minimum training requirements for transporting hazardous materials are:

- **General awareness training** to enable employees to recognize and identify hazardous materials
- **Job-specific training** for proper handling of materials
- **Safety training** that protects employees from the hazards associated with exposure to hazardous materials, and that includes emergency response information and procedures for avoiding accidents
- **Security awareness training** to provide an awareness of security risks associated with hazardous materials transportation and methods designed to enhance transportation security
- **In-depth security training** for each hazmat employee who handles hazardous materials covered by the plan, performs a regulated function related to the...
hazardous materials covered by the plan, or is responsible for implementing the plan.

Training must be provided within 90 days of employment or a change in job function. Prohibit employees from working unsupervised until training is completed. Provide refresher training at least once every 3 years and maintain personnel training records until 90 days from the date last worked as a hazmat employee. For additional training requirements for the individual modes of transportation (for example, public highway, vessels, etc.), refer to 49 CFR 174–177.

10.11 Onshore Pipelines

The Department of Transportation’s PHMSA regulates the transportation of natural gas, petroleum, and other hazardous materials by pipeline.

Site-specific training that addresses the requirements in 49 CFR 194.117 must be described in the facility’s Onshore Oil Pipeline Response Plan. Each operator must know the contents of the Response Plan, their responsibilities in an emergency, and how to contact the QI and make other emergency notifications. Personnel engaged in emergency response need additional training on spill mitigation equipment operation, proper firefighting procedures, and other response control measures to prevent spills from escalating to worsening situations. Regular emergency action drills are required, consisting of:

- Annual shore-based spill management tabletop drills
- Annual field equipment deployment drills for Oil Spill Removal Organizations
- Drills that exercise the entire Pipeline Response Plan at least once every 3 years

The PHMSA regulations in 49 CFR 195 address hazardous liquids pipelines used for interstate commerce, including pipelines that transport highly volatile liquids, anhydrous ammonia, and onshore gathering lines for petroleum. Pipeline operators must be familiar with their Operations and Maintenance Manual that addresses procedures for normal operations, abnormal operations, and emergencies. Annual operator training must address the characteristic of hazardous liquids, conditions that are likely to cause emergencies, steps to control accidental releases, and the use of fire control equipment appropriate to the operator’s job assignment. An operator’s job requirements must be written and the operator’s performance must be evaluated to ensure they are qualified.

10.12 Underground Storage Tanks

Although there are currently are no federal training requirements for owners or operators of UST systems, EPA was required by Section 1524 of the Energy Policy Act of 2005 to develop training guidelines for three distinct classes of operators who operate and maintain federally regulated UST systems. EPA published these guidelines on April 10, 2007. States that receive federal funding for its UST program must adopt state-specific training requirements consistent with the guidelines. The three classes of operators include:

- Class A Operators: Individuals with primary responsibility for onsite operation and maintenance of the UST systems
- Class B Operators: Individuals having daily onsite responsibility for the operation and maintenance of the UST systems
Class C Operators: Daily onsite employees with primary responsibility for responding to UST related emergencies such as alarms or spills and releases

Designated operators must be trained according to individual state requirements. The frequency for retraining or recertification also depends on the state requirements. Refer to Appendix E for your state agency contact information.

10.13 Environmental Management System

DLA Energy and all DoD facilities have and continue to implement an Environmental Management System (EMS) in accordance with Executive Order 13514. The EMS is patterned after International Organizations of Standards 14001 (ISO 14001). An EMS provides a practical framework for organizations to manage potential and existing environmental risks. The EMS integrates into overall business management to control the impacts that the facility’s activities, operations, products, and services have on the environment. As such, employee training is one of the key elements of an EMS. Employees should be given EMS awareness training to understand their role related to the facility’s environmental impacts, targets, and objectives. Refer to Chapter 11, Sustainable Practices, for more information about the DLA EMS. Your host installation or military Service Control Point may also have specific EMS training courses.

10.14 What Training Classes Should I Take, and Who Provides Training?

The DLA HM/HW Training Plan defines each training course and relevant criteria or content, and lists locations where these courses are offered. To identify your environmental training requirements, go to the HM/HW Training Plan and click on your facility type. Find the description that best fits your role under “Who Needs Training” and see the skill codes and required courses listed.

The HM/HW Training Plan provides a Directory of Environmental Training Courses, which lists where courses are offered. Your supervisor and your installation or Service Control Point training POC will help you identify the training required based on roles and responsibilities, and schedule your training.

Training courses are offered by a variety of DoD and non-DoD sources (see Section 10.17, For More Information). Generally, courses approved by the Interservice Environmental Education Review Board or ISEERB (see Appendix H of the DLA HM/HW Training Plan) will be given first consideration, followed by DoD courses presented or sponsored by DoD schoolhouses. When DLA/DoD courses are not available or are not competitive, courses may be obtained outside DoD to meet training requirements if they meet regulatory training requirements as determined by the environmental HM/HW POC.

10.15 DLA Environmental Training Courses

The DLA recommends training courses for contracting officers, facility managers, superintendents, quality surveillance specialists, and others in the field. Listed below are some potential course topics that DLA Energy suggests may be important in your training:

- **In-Land Oil Spill Response** – information and training to evaluate the management of spill response
Environmental Laws – information about various laws and regulations, including the following:

- Clean Air Act (CAA)
- Clean Water Act (CWA)
- CERCLA
- Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA)
- National Environmental Policy Act of 1969 (NEPA)
- OSHA
- OPA 90
- RCRA
- Toxic Substances Control Act (TSCA)

Soil and Groundwater Remediation – overview of the many investigation and remediation techniques used today and case studies of actual projects

Hazardous Waste Management – information on identifying, storing, transporting, and disposing of hazardous wastes

OSHA HAZWOPER – OSHA requirements for personnel involved in cleaning up hazardous substances

EPCRA/Community Right-to-Know – requirements for working with your state and community emergency planning committees to plan for and respond to emergencies (also includes reporting requirements to your community)

Pollution Prevention and Sustainability – environmentally friendly or “green” procurement, building operations, infrastructure, materials management, resource consumption, as well as life cycle analysis and other strategies

Stormwater Management – soil and sediment erosion control management practices and implementation

Environmental Management System – awareness of environmental impacts and setting objectives and targets to improve environmental performance

Training is more effective when it’s part of operations and connected directly to the job. Formal classroom training is best if supplemented with on-the-job training (OJT). OJT is a form of apprenticeship where employees are supervised and shown skills and competencies at their work site using the actual tools, equipment, and documents that are required when fully trained. In addition, check with your Service Control Point as to specific training opportunities.

10.16 State Requirements

In addition to online courses, many locally offered classes address unique local and state requirements that could be important to you. Check with your supervisor, installation environmental POC or training POC for state and local training requirements. For instance:

- In California, UST operators need training, testing, and certification every 24 months. All UST facility employees in California must be trained annually by a designated UST operator on proper operations, maintenance, and spill response. California has other unique training requirements besides the UST operator requirements. Since 1994, California regulations have required marine terminal personnel to be trained in proper oil handling and leak detection monitoring, and require a facility to certify that the personnel have been properly trained.
California requires state-specific training courses for Qualified SWPPP Developers who write SWPPPs and Qualified SWPPP Practitioners who implement SWPPPs.

Certified Erosion and Sediment Control Lead Inspectors are required in Washington, South Carolina, Tennessee, and Florida for personnel responsible for construction stormwater inspections and sampling at construction sites. Other states are also proposing formal certification and training for their SWPPP implementers.

Texas has training and licensing requirements for wastewater and sewage operations, water treatment specialists, landfill operators, and other environmentally related roles.

In Illinois, as in many other states, Class A and Class B UST Operator certifications are combined into the Class A/B Operator certification. Also, most states do not offer reciprocity for UST operator training from another state.

### 10.17 For More Information

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<td><strong>Agencies</strong></td>
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<td>DLA Training Center Columbus, OH</td>
<td><a href="http://www.hr.dla.mil">www.hr.dla.mil</a> 800-458-7903</td>
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<td><strong>Documents and References</strong></td>
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<td>Response Plan training</td>
<td>Training Reference for Oil Spill Response (USCG-X0188), August 1994, available from TASC Dept. Warehouse, 3341Q 75th Ave., Landover, MD 20785, or <a href="http://www.nrt.org/production/NRT/NRTWeb.nsf/AllAttachmentsByTitle/A-384trosr/SFile/trosr.pdf?OpenElement">www.nrt.org/production/NRT/NRTWeb.nsf/AllAttachmentsByTitle/A-384trosr/SFile/trosr.pdf?OpenElement</a></td>
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### 10.18 Action Items

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<td>Prepare and update all Emergency Response Plans applicable to your facility.</td>
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<td>Develop and implement environmental training programs applicable to your operations.</td>
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<td>Ensure that new employees receive appropriate training in a timely manner.</td>
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<td>Review environmental permits and state and local regulations for training requirements.</td>
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<td>Make sure all employees know their role in responding to spills and have been adequately trained for that role.</td>
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