

This chapter answers the following questions about environmental training:

- Why is training needed?
- What are some examples of environmental conditions that could trigger training requirements?
- What are some examples of training courses that could be required?

10.1 The Need for Training

Training helps individuals perform their jobs properly and is required to ensure the organization complies with applicable legal and other requirements and maintains operational control while achieving 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 through training is to develop a training matrix with job titles and associated required training and due dates. Training can help you stay familiar with the ever-changing regulations, such as the *Code of Federal Regulations*, the *Federal Register*, Presidential Executive Orders, state and local requirements, U.S. Department of Defense (DoD) directives, and other requirements.

10.2 Regulatory Training Requirements

Each site must ensure that employees are properly maintaining the training requirements of their installation. Training requirements must be based on all applicable environmental and safety laws, rules, and regulations. 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 (FRPs)
- 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 management system (EMS) requirements

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





- Safety and Health Training: Supervisors must ensure employees are made aware of the physical and chemical hazards associated with chemicals in the workplace. Safety Data Sheets (SDSs) must be readily available to employees (29 CFR 1910.1200).
- Response Plan Training: Facility Management must ensure an oil spill response training program is developed and implemented if your facility is required to have a:
 - Response plan for marine transportation-related (MTR) facilities (33 CFR 154.1050)
 - SPCC Plan (40 CFR 112.7(f))
 - FRP (40 CFR 112.21)
 - DOT response plan for transport (49 CFR 130.31)
 - DOT response plan for pipelines (49 CFR 194.117)
 - DOT cross-county pipeline (49 CFR 195.403)
 - DOT Hazardous Materials (HAZMAT) Training: Employees who load, unload, and/or transport HAZMAT must attend training on DOT shipping regulations (49 CFR 172 Subpart H)
- Other Environmental Training: Hazardous waste management (40 CFR 262.17(a)(7)), universal waste management (40 CFR 273.16 and .36), and stormwater management (per NPDES).



10.3 Examples of Environmental and Safety Training

10.3.1 Hazard Communication Standard

The **Hazard Communication Standard** (HCS, 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 (29 CFR 1910.1200). This standard aligns with the United Nation's Globally Harmonized System of Classification and Labeling of Chemicals.

Employers 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. Employers must inform employees of:

- The HAZCOM standard and its requirements
- Operations in their work area if hazardous chemicals are present
- Location and availability of the following:
 - Written HAZCOM Plan
 - Hazardous chemical inventory
 - Safety data sheets (SDSs)

Employee training must include, but is not limited to, the following:

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

10.3.2 Hazardous Waste Operations and Emergency Response Training

Hazardous Waste Operations and Emergency Response (HAZWOPER) training is required for the following personnel involved in the:

- Cleanup of a Superfund site (29 CFR 1910.120(a)(1)(i)) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
- Cleanup of a site under Resource Conservation and Recovery Act (RCRA) corrective action (29 CFR 1910.120(a)(1)(ii))
- Voluntary cleanup operations at sites recognized by federal, state, local, or other governmental bodies as uncontrolled hazardous waste sites (29 CFR 1910.120(a)(1)(iii))

The Law Says...

CERCLA's Petroleum Exclusion

Fuel spills are subject to HAZWOPER requirements.

EPA interprets CERCLA Section 101(14) to exclude crude oil and fractions of crude oil – including the hazardous substances, such as benzene, that are indigenous in those petroleum substances – from the definition of hazardous substance. However, under 29 CFR 1910.120 petroleum products are covered under the definition of "hazardous substance" which references hazardous materials under 49 CFR 172.101, where petroleum products are listed.

- Operations involving hazardous wastes that are conducted at a RCRA treatment, storage, and disposal (TSD) facility (29 CFR 1910.120(a)(1)(iv))
- Emergency response operations for releases of, or substantial threats of releases of, hazardous substances without regard to the location of the hazard (29 CFR 190.120(a)(1)(v))

Although 29 CFR 1910.120(a)(1)(v) refers specifically to hazardous substances, which is a term used under CERCLA, 29 CFR 1910.120(a)(3) broadens the definition to include U.S. Department of Transportation (DOT) hazardous materials, RCRA hazardous wastes, and certain biological agents as explained below:

- Hazardous Substances are those:
 - Listed Hazardous Substances in 40 CFR 302, Table 302.4, <u>List of Hazardous</u> Substances and Reportable Quantities.
 - **Unlisted Hazardous Substances** that include solid wastes, as defined in 40 CFR 261.2, which are not excluded from regulation as a hazardous waste under 40 CFR 261.4(b), that exhibit any of the characteristics identified in 40 CFR 261.20 through 261.24.
- Hazardous Materials are those listed under DOT regulations in 49 CFR 172.101, <u>Hazardous Materials Table</u>.
- Hazardous Wastes are those wastes defined under the RCRA regulations in <u>40 CFR 261, Subparts C and D</u>.
- Biological Agent and other disease-causing agent that, after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any person, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction), or physical deformations in such persons or their offspring.

General training requirements under 29 CFR 1910.120(e)(1)(i), (3), and (8) require that all employees, supervisors, and managers working on-site (and managers responsible for the site) who are exposed to hazardous substances, health hazards, or safety hazards must receive initial training before working on-site. Training for regular general site workers, supervisors, and managers must include a minimum of an initial 40 hours of off-site instruction (and 8 hours of annual refresher) and a minimum of 3 days actual field experience under the direct supervision of a trained, experienced supervisor. Other site workers, supervisors, and managers (e.g., occasional workers) require less training.

Specific training requirements for emergency response, no matter where it occurs, are found in 29 CFR 1910.120(q). If you have employees (or contractors) whose roles and responsibilities include responding to spills (or even threatened releases) of hazardous substances, materials (including fuels), or wastes 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

The Law Says

These HAZWOPER requirements are all part of an Emergency Response Plan required under 29 CFR 1910.120(q)(1). However, if you have an Emergency Action Plan that complies with 29 CFR 1910.38(a) and you evacuate your employees when an emergency occurs (and do not let them assist in emergency operations), then you are exempt from the Emergency Response Plan requirements. 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 29 CFR 1910.120(q) (6)(I) through (v).Training curriculum guidelines are provided in Appendix E to 29 CFR 1910.120.

Small, incidental releases onto the land where the spill 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 training. Nevertheless, personnel would still be required to have at a minimum training in HAZCOM, using personal protective equipment (PPE), and proper disposal of waste. It is important to note that even small spills of oil into surface water require response and notification (see <u>Chapter 2, Incident and Spill</u> <u>Reporting</u>).

10.3.3 Oil Spill Response Plan Training

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

These plans prepare facility personnel to respond to an oil spill (see <u>Chapter 1,</u> <u>Environmental and Emergency Response Planning</u>). 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.



To facilitate compliance, it is recommended that site training programs be based on the latest version of the <u>National Preparedness for Response Exercise Program</u> (<u>PREP</u>) <u>Guidelines</u> developed by EPA, USCG, PHMSA, and the U.S. Department of Interior, Bureau of Safety and Environmental Enforcement (BSEE). The link provided is to the 2016 PREP Guidelines, so be sure to use the most recent version of the guidelines. This guidance profiles general guidelines that may be applied to your specific response training requirements.

PREP addresses the exercise requirements for oil pollution response plans. Although use of the guidelines is strictly voluntary, its use is encouraged because it provides information to improve response plans and the response system. Because PREP Guidelines describe the minimum requirements for ensuring adequate response preparedness, plan holders may want to expand their training programs beyond the PREP Guidelines.

Section 2.0 of the PREP guidelines describes how response planning should be generally approached under the following four basic guiding principles: safety, core response plan components, plan-holder training exercises, and area-level exercises. These guiding principles offer details on how plan-holders may implement their plans based on the type of plan and the level of participation of the participants to include contractor support. PREP provides detailed guidance on various types of regulated operations, such as DOT/PHMSA regulated facilities and pipelines (PREP Guidelines, Section 5.0).

10.3.4 Spill Prevention, Control, and Countermeasure Plan

The SPCC regulations in 40 CFR Part 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 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 should develop specific lesson plans relevant to facility personnel and implement a program of facility response drills and exercises based on PREP.

Training should emphasize oil/water separators and grease traps. In addition to being part of the SPCC Plan, many municipalities have specific ordinances that prohibit the pass-through of oil and grease into the sanitary sewer system. These local ordinances typically address operation and maintenance, inspections, cleaning out, and required covers to exclude stormwater from entering the sewer system and grit interceptors for vehicle wash racks.

Check with your state, county, or local municipality for specific training requirements.







10.3.5 Stormwater Pollution Prevention Plan

EPA and state National Pollution Discharge Elimination System (NPDES) individual, general, and Multi-Sector General Permits (MSGPs) 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 in accordance with 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.

EPA's <u>Developing Your Stormwater Pollution Plan</u>, Section 4.I, Employee Training, states that stormwater pollution prevention training is required for all employees who work in operations that affect stormwater and/or are responsible for implementing activities necessary to meet the conditions of this permit, including inspectors, maintenance personnel, and all members of the pollution prevention team. Training must cover:

- Content of the SWPPP
- Control measures implemented to achieve compliance with applicable discharge requirements
- Spill containment and cleanup procedures
- Maintenance, monitoring, inspection, and planning
- Reporting and recordkeeping requirements

Best management practices (BMPs) are critical components of the SWPPP. BMP implementation should be reinforced through regular training. In fact, training itself is a BMP. An effective BMP for fueling dispensing operations is to ensure the area is designed and operated to minimize contact between spilled fuel and stormwater. This can be accomplished through roofing and providing an impervious berm to keep the surface runoff outside the liquid dispensing area. Other common BMPs include:

- Good housekeeping
- Drum and container containment
- Tank containment
- Impervious vehicle, pavement, and building washing with proper drainage
- Oil/water separators
- Equipment covers
- Dumpster covering
- Stormwater diversion
- Speed bumps and speed humps

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 <u>Chapter 9, Wastewater and Stormwater</u> for more information about the SWPPP.



10.3.6 Hazardous Waste

Training requirements for **large quantity generators (LQGs)**, **small quantity generators (SQGs)**, and **very small quantity generators (VSQGs)** of hazardous waste are outlined in *Exhibit 10–1*.

EXHIBIT 10-1

Hazardous Waste Generator Requirements

| Requirement | VSQG | SQG | LQG |
|--|-------------------------------|--|---|
| Ensure appropriate personnel complete classroom or on-the-job training to become familiar with proper hazardous waste management and emergency procedures for the wastes handled at the facility. | Not Required 40 CFR 262.14 | Basic training required 40 CFR 262.16(b) (9)(iii) | Full training required 40 CFR 262.17(a)(7) |

For information on hazardous waste generator classifications and universal waste, see <u>Chapter 7, Hazardous and Recycled Waste</u>.

10.3.6.1 Large Quantity Generators

Within 6 months of employment or assignment to your facility, or to a new position at your facility, employees who handle hazardous waste as part of its generation, storage, or shipping must complete a program of classroom instruction, computer-based, 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.

10.3.6.2 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.

10.3.6.3 Very Small Quantity Generators

Although training is not required for VSQGs, many organizations provide basic instruction on what types of hazardous wastes are generated for worker awareness.

10.3.7 Universal Waste

EPA established less strict requirements for certain widely used 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.

10.3.8 Hazardous Materials Transportation

The transportation regulations of 49 CFR Part 172 include 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) refer to 49 CFR Parts 175–177.

10.3.9 Onshore Pipelines

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. See <u>Section</u> <u>1.5.3, Onshore Pipelines</u> for more information on this plan. Each operator must know the contents of the response plan, their responsibilities in an emergency, and how to contact the qualified individual (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 Part 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.

10.3.10 Underground Storage Tanks

Although there are currently are no federal training requirements for owners or operators of underground storage tank (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 their UST programs must adopt state-specific training requirements consistent with the guidelines. The three classes of operators include:



- Class A operators: individuals with primary responsibility for on-site operation and maintenance of the UST systems
- Class B operators: individuals having daily on-site responsibility for the operation and maintenance of the UST systems
- Class C operators: daily on-site employees with primary responsibility for responding to UST-related emergencies, such as alarms or spills and releases

In 2015, EPA revised the UST operator training requirements as outlined in *Exhibit* 10–2.

EXHIBIT 10-2

Class A and B UST Operator Training Requirements

| Requirement | Class A Operator | Class B Operator |
|---|---------------------|---------------------|
| Spill and overfill prevention | \checkmark | \checkmark |
| Release detection | \checkmark | |
| Release detection and related reporting | | \checkmark |
| Corrosion protection | \checkmark | \checkmark |
| Emergency response | \checkmark | \checkmark |
| Product and equipment compatibility and demonstration | \checkmark | \checkmark |
| Financial responsibility | \checkmark | |
| Notification and storage tank registration | \checkmark | |
| Temporary and permanent closure | \checkmark | |
| Environmental and regulatory consequences of releases | \checkmark | \checkmark |
| Operation and maintenance | | \checkmark |
| Release detection and related reporting | | \checkmark |
| Reporting, recordkeeping, testing, and inspections | \checkmark | \checkmark |

Class C operators must either (1) be trained by a Class A or Class B operator; (2) complete a training program; or (3) pass a comparable examination. The training option chosen must teach or evaluate the Class C operator's knowledge to take appropriate actions (including notifying appropriate authorities) in response to emergencies or alarms caused by spills or releases resulting from the operation of the UST system.

Class A operators must also meet the training requirements for Class B and C operators. Class B operators must also meet the training requirements for Class C operators.

The training program must include an evaluation through testing, a practical demonstration, or another approach acceptable to the implementing agency. A comparable examination must, at minimum, test Class A, Class B, or Class C operators' knowledge on the required topics.

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

10.3.11 Environmental Management System

An EMS program 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. DLA Energy continues to, and other DoD facilities may have to continue to, maintain an EMS program in accordance with DoD guidance. DoD patterned the EMS requirement after International Organization for Standardization 14001 (ISO 14001). Employee training is one of the key elements of an EMS program. Employees should be given EMS awareness training to know and understand DLA Energy's Environmental Policy and, at minimum, how their role relates to their installation's:

- Environmental aspects
- Legal and other requirements
- Operational controls

Your host installation or military Service Control Point also may have specific EMS training courses.

10.4 Other Requirements

Each installation needs to understand if its state has any unique environmental and/or safety requirements for training. Check with your supervisor, installation environmental point of contact (POC), or training POC for state and local training requirements. Examples of state-required training include:

Even after EPA's changes in UST requirements that went into effect in October 2018, California's UST operator training and certification requirements are still more stringent that the federal requirements. For example, UST owners and operators must submit a signed statement indicating that the owner or operator understands and is in compliance with all applicable UST requirements and identifying the designated UST operator(s) for each of their facilities. Also, California requires 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 in addition to 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. In California, there are no Class A or Class B operators, only a designated operator (DO). All DOs must be certified through the International Code Council (ICC) every 2 years. DOs also perform a detailed monthly on-site inspection and provide on-site training to Class C employees. In general, the UST operator training program (California Code of Regulations Title 23, Chapter 16, Section 2715, Certification, Licensing, and Training Requirements for Underground Storage Tank Owners, Operators,

Other Requirements

Facility Employees, Installers, Service Technicians, and Inspectors) exceeds the minimum federal requirements.

- California requires state-specific training courses for qualified SWPPP developers who write SWPPPs and qualified SWPPP practitioners who implement SWPPPs. The California Stormwater Best Management Practice Handbooks published by the Stormwater Quality Task Force (SWQTF) provides guidance.
- Certified Erosion and Sediment Control Lead (CESCL) certification is required in some states (for example, Washington, South Carolina, Tennessee, Virginia, and Florida) for personnel responsible for construction stormwater inspections and sampling at construction sites. Other states may have formal certification and training for their SWPPP implementers. Check with your state regulatory agency.
- Texas has training and licensing requirements for wastewater and sewage operations, water treatment specialists, landfill operators, leaking petroleum storage tank corrective action specialist and project managers, UST contractors and on-site supervisors, and other environmentally related roles. Other states may have similar requirements. Check with your state regulatory agency.

Always check with your state agency for certification/licensing requirements, state-approved training programs, and other training opportunities.



10.5 For More Information

| For Information On | See | | |
|---|--|--|--|
| Agencies | | | |
| DLA Training Center Columbus, OH | http://www.dla.mil/HQ/InformationOperations/ Offers/Services/TrainingandReference/Training.aspx (800) 458–7903 | | |
| Defense Environmental Network and Information eXchange (DENIX) | https://www.denix.osd.mil | | |
| Fed Center sponsored training | https://www.fedcenter.gov/training | | |
| EPA National Enforcement Training Institute eLearning Center | www.epa.gov/compliance/training/neti/courses. <u>html</u> | | |
| Interstate Technology and Regulatory Council, advancing environmental solutions | <u>www.itrcweb.org</u> | | |
| Trainex, the Training Exchange Website | www.trainex.org/hazwoper.cfm | | |
| U.S. Army Environmental Command, Defense and Federal Training | http://www.aec.army.mil/ | | |
| U.S. Army Quartermaster School, Petroleum and Water Department, Fort. Lee, VA 23801 | <u>www.quartermaster.army.mil/pwd/pwd_main.html</u> (804) 734–2820 | | |
| U.S. Army Corps of Engineers, Learning Center | http://ulc.usace.army.mil | | |
| Naval Civil Engineering Corps Officers School Environmental Compliance Courses | https://www.public.navy.mil/netc/centers/csfe/ cecos/CourseList.aspx?GroupID=3 | | |

| For Information On | See | | |
|---|---|--|--|
| Documents and References | | | |
| Hazard Communication Standard and United Nation Globally Harmonized System of Classification and Labeling of Chemicals | www.osha.gov/dsg/hazcom/index.html www.osha. gov/dsg/hazcom/ghs.html | | |
| HAZWOPER training (U.S. National Response Team website) | https://www.nrt.org/ | | |
| Response Plan Training | Training Reference for Oil Spill Response (USCG– X0188), August 1994, available from TASC Dept. Warehouse, 3341Q 75th Ave., Landover, MD 20785, or https://www.nrt.org/sites/2/files/trosr%201994.pdf National Preparedness for Response Exercise Program (PREP) Guidelines (USCG–X0241), August 2002 available from TASC Dept. Warehouse, 3341Q 75th Ave., Landover, MD 20785, or https://www.bsee.gov/sites/bsee_prod.opengov. ibmcloud.com/files/final_2016_prep_guidelines.pdf | | |

10.6 Action Items

| Item | Date Started | Date Completed | N/A | Comment(s) |
|---|-----------------|-------------------|-----|------------|
| <i>Develop and implement</i> environmental training programs applicable to your operations. | | | | |
| <i>Review</i> your roles and responsibilities, as well as assigned skill codes and training requirements with your supervisor. | | | | |
| <i>Ensure</i> that new employees receive appropriate training in a timely manner. | | | | |
| <i>Conduct</i> refresher training as often as required (or more frequently if necessary). | | | | |
| <i>Keep</i> records of environmental training courses attended. | | | | |
| <i>Review</i> environmental permits and state and local regulations for training requirements. | | | | |
| <i>Make sure</i> all employees know their role in responding to spills and have been adequately trained for that role. | | | | |
| <i>Provide</i> general awareness training for your employees so they know where hazardous substances are used, and hazardous waste is managed. | | | | |

 \checkmark

Action Items

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