

# NHED

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Northeast Higher Education District

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Member of Minnesota State Colleges and Universities

## **HAZARDOUS WASTE TRAINING PLAN**

**May 2015**

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## Section 1: Introduction

Very Small Quantity Generators (VSQGs) and Minimal Quantity Generators (MiniQGs) of hazardous waste are not required under Minnesota Hazardous Waste Rules to train their employees. However, the Minnesota Pollution Control Agency (MPCA) encourages all waste generators to train their employees in hazardous waste management and emergency response.

VSQGs may be required under other federal or state regulations, such as Occupational Safety and Health Administration (OSHA) and Department of Transportation (DOT) regulations, to train employees in actions that may relate to hazardous waste.

NHED will provide Hazardous Waste Training to all new employees as part of their New Employee Orientation because it is recommended by the MPCA and it is considered an industry best practice.

## Section 2: Purpose

The purpose of NHED's Hazardous Waste Training Plan is to ensure that NHED employees are:

1. Aware of the hazardous waste being generated at their campus and work site
2. Familiar with the proper management of hazardous waste being generated at their work site
3. Aware of the emergency response procedures appropriate to their work site

## Section 3: Definitions

**Hazardous Waste:** Waste that displays one of the hazardous characteristics – including both used and unused products that are discarded, manufacturing and process wastes, and soil and debris contaminated with these wastes. The waste has been evaluated at the point of generation and has been determined to be hazardous based on either of the following reasons:

1. It is "listed" – its chemical name appears on one of four lists in the Minnesota Hazardous Waste Rules, or it contains 50 parts per million (ppm) or greater of polychlorinated biphenyls (PCBs); or
2. It is "characteristic" – it displays any of the six hazardous characteristics. The six characteristics are Ignitable, Oxidizer, Corrosive, Reactive, Toxic, or Lethal.

**Generator:** A business or other entity that first causes a material to be a waste.

### **Generator Size Determination:**

<b>If you generate:</b>	<b>Then your size is:</b>
<ul style="list-style-type: none"><li>• 220 pounds or less of hazardous waste per month</li></ul>	VSQG (Very Small Quantity Generator)
<ul style="list-style-type: none"><li>• More than 220 pounds but less than 2,200 pounds of hazardous waste per month</li></ul>	SQG (Small Quantity Generator)

<ul style="list-style-type: none"> <li>• More than 2,200 pounds of hazardous waste per month or</li> <li>• More than 2.2 pounds of acute hazardous waste per month</li> </ul>	<p>LQG (Large Quantity Generator)</p>
A VSQG that produces less than 100 pounds of hazardous waste and no acute waste per year	<p>MiniQG (Minimal Quantity Generator)</p>

**Universal Waste:** A subset of hazardous wastes that may be managed in Minnesota under reduced requirements. These wastes are referred to as *universal* because, at some point, almost every business, non-profit organizations, and government agency generates them. In Minnesota Universal waste includes:

- Batteries: Includes, but is not limited to lead acid, nickel cadmium, lithium greater than 9 volts, silver-containing and mercury-containing types.
- Lamps: Includes, but is not limited to fluorescent, high intensity discharge (HID), mercury vapor, low and high pressure sodium (LPS & HPS), metal halide, and neon.
- Mercury-containing equipment: Includes, but is not limited to thermometers, thermostats, barometers, pressure gauges, switches, relays, and pump seals.
- Pesticides: Includes, but is not limited to fungicides, herbicides, insecticides, nematicides, and rodenticides.
- Dental Amalgam being recycled
- Pretreated Dental Water

#### Section 4: Roles and Responsibilities

Specific responsibilities for carrying out this program are identified by position below.

##### NHED Safety Administrator:

- Ensures annual review, evaluation, and necessary updates to Hazardous Waste Training Plan.
- Ensures that employee training records and required records are maintained.
- Works in conjunction with work site supervisors to develop appropriate emergency procedures and training programs.
- Ensures proper waste management

##### Campus Safety Officers:

- Reviews and evaluates NHED's Hazardous Waste Training Plan annually.
- Evaluates and reviews the program effectiveness.
- Works in conjunction with work site supervisors to develop appropriate emergency procedures and training programs.
- Ensures proper waste management

##### Provost, Administration, Deans, Directors:

- Supports the overall Hazardous Waste Training Plan.
- Provides resources for hazardous waste training to meet regulatory requirements.

#### Department Heads or Supervisors:

- Ensure that the NHED Hazardous Waste Training Plan is followed.
- Oversees employee training.
- Develops appropriate emergency response procedures appropriate to their work site.
- Ensures proper waste management

#### Employees:

- Complies with the requirements of this training plan.
- Attends required training sessions.
- Learns emergency response procedures appropriate to their work site.

### **Section 5: Training**

NHED campuses will provide Hazardous Waste Training to all new employees as part of their New Employee Orientation. Hazardous Waste training will be provided at other times, as needed.

Training will include but is not limited to the following:

- Campus Waste Management Plans
- Hazardous Waste container management, selection, storage, and labeling
- Inspection of Stored Waste
- Shipping Procedures
- Accumulation Limits
- Recordkeeping
- Manifests / Land Disposal Restrictions
- Emergency Procedures
- Evaluation of Wastes

Employees that work in areas that generate hazardous waste which are identified on Hazardous Waste and Universal and Other Waste Management Plans will receive training specific to their work site.

Hazardous Waste refresher training may be given to all employees on campus Duty Days.

### **Section 6: Records**

Records of training are documented and retained for a minimum of 3 years. Training documentation includes:

1. Date and location of training
2. Names of employees attending and their signatures
3. Name and title of person conducting the training
4. Brief summary of material covered

### **Section 7: Program Review**

Annual reviews of the Hazardous Waste Management Plan are conducted.