

Hazardous waste training

What kind of training do your employees need if your company generates hazardous waste? This depends on how much hazardous waste is generated and stored at your facility. Small-quantity generators are not required by regulation to train their employees; however, training is recommended to assure your employees' safety. Kansas-category generators, however, are required by the state [Kansas Administrative Regulations or K.A.R. 28-31-4(h)(8)] to train their employees in "proper waste handling and emergency procedures that are relevant to the employee's responsibilities during normal facility operations and emergencies" and to have one person designated as an emergency coordinator to handle emergencies involving hazardous waste accumulated on site (K.A.R. 28-31-4-(h)(6)). The K.A.R. can be downloaded or referenced at KDHE's Bureau of Waste Web site by going to <http://www.kdheks.gov/waste/index.html> and choosing "Hazardous Waste Statutes and Regulations" on the left-hand side of the page under the Regulations and Policies sidebar. EPA generators must conduct and document more extensive employee training as required by K.A.R. 28-31-4(g)(4) and the Code of Federal Regulations (CFR) Chapter 40 Part 265.16.

So what should Kansas-generator employee training include? Let's break the requirements down into two parts. The first is what an employee should know for "normal" operations and secondly, what to know during emergency operations. During normal operations, if an employee is involved in a process that uses a hazardous material that will become a hazardous waste and he or she has to handle, containerize, label, or store this waste, they should know—

- the definition of a waste, what makes it hazardous, and how to classify the waste.
- if wastes are compatible with other wastes or raw materials stored in the same areas, and be able to segregate wastes accordingly.
- where hazardous waste is stored and the difference between satellite container management and container management in the hazardous waste storage area.
- proper labeling and storage requirements, container compatibility and dating requirements, closed-container requirements, and how to determine if a container is "RCRA-empty."
- how to quantify waste and be aware of the company's generator category and monthly waste tracking and recordkeeping requirements (as pertinent to the employees' positions).
- what to look for when inspecting the hazardous waste storage area at the facility, if appropriate to their duties.

- requirements for using, preparing, and signing hazardous waste manifests as pertinent to an employee's duties.

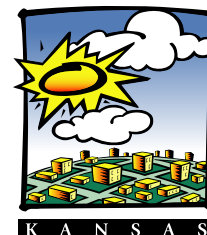
Regulations also stipulate that employees of Kansas-category generators should be thoroughly familiar with emergency procedures relevant to their job duties or responsibilities. Although companies that generate hazardous waste are not required by hazardous waste regulations to have an emergency spill-response team on site and may contract out spill-response and cleanup work, they are responsible for the following:

- Emergency calls to fire departments in case of fires and attempts to extinguish fires as quickly as possible.
- Knowing when to activate internal emergency procedures and who to call in the event of emergency. Emergency contact information must be posted near a phone that is accessible during emergencies.
- Containing spills to the extent possible as soon as possible and calling appropriate emergency responders if contracted by an outside agency.
- Knowing what kinds of emergencies they are required to respond to and what emergency response procedures they are qualified and expected to perform.
- Knowing where emergency response equipment is located and under what conditions it should be used.
- Contacting KDHE and the National Response Center as appropriate and according to K.A.R. 28-31-4(h)(9)(c).

Both Kansas and EPA generators must comply with emergency preparedness and prevention requirements found in 40 CFR 265 Subpart C, to minimize the hazards of unplanned releases of hazardous waste. Additionally, EPA generators must also comply with 40 CFR Subpart D, contingency plan and emergency procedures.

The amount of training your employees need is highly dependent on the hazards involved in your facility's operations, what employee job duties are with respect to handling hazardous waste and emergencies, and how "pro-active" you wish to be. Companies with high potential for spills of hazardous waste often choose to train their own emergency spill-response team so they can control the emergency as soon as possible and limit the impact of such incidences. In this case,

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additional training is required by OSHA regulations and the level of training depends on the employees' level of involvement in the spill response. For a detailed explanation on different levels of training for employees involved in a hazardous waste spill

response, please see the presentation at <http://www.osha.info.gatech.edu/hazwoper/sld019.htm>.

For more information on training resources, please contact Kansas SBEAP at 800-578-8898.

Why do I need an environmental management system?

Do you want greater assurance in maintaining regulatory compliance? Would you like to have a training document that guides employees' handling of hazardous wastes, contaminated water discharges, or air emissions to help your company stay in compliance? If so, an environmental management system (EMS) is the answer and you will not want to miss the free EMS workshops to be held in Salina, Wichita, and Kansas City on April 4, 11, and 25, respectively, in 2006.

An EMS provides a tool for improving environmental performance and is based on the "plan, do, check, act" model for continuous improvement and compliance assurance. In the planning phase, upper management defines an environmental policy suited to your products, activities, and services, and commits resources to develop the EMS. The planning phase "sets the pace" for your employees to understand the company's long-term commitment to environmental compliance.

In the "do" phase, environmental management responsibilities are assigned, training needs are identified, work procedures are

written, and emergency response plans are created. This part of the EMS systematically determines every "aspect" of your processes that has significant environmental impact and develops procedures to minimize or control those impacts. The documents developed in the "do" phase will save your company many hours of time and money because they basically yield a written training document that human resources, line supervisors, and new and old employees can use to guide their work in the safest, most cost-effective, and environmentally compliant manner. In the "check" phase, activities are monitored and results are noted. In the "act" phase, variances from the plan are reviewed with top management and the EMS is adjusted as necessary to provide continuous improvement.

For more information about the free EMS workshops, contact Steve Travis at 913-764-6305 or visit our Web site at www.sbeap.org for registration information. Some helpful Web sites for EMS information are www.peercenter.net, www.p2pays.org, www.epa.gov/performancectrack, and <http://www.dnr.mo.gov/services/memp-ems.htm>.

Who, what, and where...

When you have a question about waste, water discharge, or air emissions, do you have a clear-cut idea who to call? The Web sites of the Kansas Department of Health and Environment (KDHE) and its Small Business Environmental Assistance Program (SBEAP) are a good place to start your search for assistance.

KDHE's main Web site has a new address, so you may want to take the time now to update your Web bookmarks. The main page lists each regulatory bureau and can be found at

<http://www.kdheks.gov/environment/index.html>. Each bureau page provides up-to-date staff listings and phone numbers to help you identify the person most appropriate for your questions and also includes valuable technical documents, permits, and instructions.

KDHE also funds the SBEAP at Kansas State University to help companies with their regulatory requirements. SBEAP can be reached via a toll-free hotline at 800-578-8898, or you may wish to visit its Web page at <http://www.sbeap.org/>.

Small Business Environmental Assistance Program

The mission of the Kansas Small Business Environmental Assistance Program (SBEAP) is to help Kansas small businesses comply with environmental regulations and identify pollution prevention opportunities. SBEAP is funded through a contract with the Kansas Department of Health and Environment. SBEAP services are free and confidential. For more information, call 800-578-8898, send an e-mail to SBEAP@ksu.edu, or visit our Web site at www.sbeap.org.



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Dear EnviroMike:

I collect hazardous waste at my work station during the day in a gallon jug and empty it into a drum at the end of my shift. I'd like to confirm I'm managing this waste properly. Thanks for any advice.

— Signed,
Day-Container Dave



If your facility is a Kansas or EPA hazardous waste-category generator, the gallon jug at your work station is a "day-accumulation container." KDHE defines this as any container with a capacity of five gallons or less that is used to accumulate hazardous waste at a work area or station, and that is under direct control of the operator of the work area or station. You must have written approval from KDHE to use day containers. Make sure your jug is in good condition and labeled "Hazardous Waste." The lid must be on tight when not adding or removing waste from the jug. Check the new guidance document for additional details.

Dear Dave,

Take a look at KDHE's new technical guidance document on container management on the Web at www.kdheks.gov/waste. Click on the link, Technical Guidance Documents, in the left column under the Regulations and Policies heading. If you prefer a hard copy, contact SBEAP at 800-578-8898.

Don't be shy—apply for pollution prevention awards

Last August, eight Kansas businesses, industries, and/or individuals were recognized for waste-minimization efforts and received pollution prevention (P2) awards.

The Kansas P2 Award Program, referenced at <http://www.kdheks.gov/sbcs/>, is among several awards programs that recognize P2 efforts.

Others include –

- National Small Business Assistance Program: http://www.smallbiz-enviroweb.org/sbalawards_smallbusiness_2006.html
- EPA Region 7: <http://www.epa.gov/region7/p2/awards.htm>
- National P2 Roundtable: <http://www.p2.org/p2week/Awards.cfm>
- Hospitals for a Healthy Environment: <http://www.h2e-online.org/awards/index.htm>

Kansas applications are due in June, but don't delay. If you need help quantifying your P2 efforts, call SBEAP at 800-578-8898 now for ideas and assistance. With some thought and planning, YOU could be accepting an award next year. So don't be shy—let SBEAP help you apply!



Air Quality 101 Workshops

Program overview and regulatory updates

January 10 – Salina

January 19 – Wichita

January 24 – Overland Park

Call 800-578-8898 to register.

Envirolines reporting and events calendar

Air Quality 101 Workshops will be held at the following locations in January 2006:

Jan. 10 – Salina

Jan. 19 – Wichita

Jan. 24 – Overland Park

Details are posted at <http://www.sbeap.org/workshops.html>.

2nd Annual Watershed Restoration and Protection Strategy (WRAPS) Conference will be held Jan. 26, 2006, at the Holiday Inn in Salina. Contact Lisa Duncan, KDHE, at 785-296-4195 or email nps@kdhe.state.ks.us for registration information.

Environmental Management System (EMS) Workshops will be held in 2006 on April 4, 11, and 25 in Salina, Wichita, and Overland Park, respectively. Details will be posted soon on the SBEAP workshop page at <http://www.sbeap.org/workshops.html>.

Dry-cleaner compliance calendars: All registered dry cleaners will receive their 2006 compliance calendars in December. Please call 800-578-8898 if you do not get yours.

Small Business Assistance Program National Conference will be March 26–30, 2006, at the Mt. Washington Resort, Bretton Woods, New Hampshire. Details are posted at <http://www.sbaconference.com/>.

The EHS (Environmental Health and Safety) Network meets regularly in Hesston, Moundridge, and Wichita to provide important safety and environmental training to small businesses absolutely free. For more information about topics or meeting locations and times, please contact:

Sandy LeSage, The Hayes Co., 316-337-7651

Christy Call, Lee Aerospace, 316-636-9200

Mick Groom, AGCO Corp., 620-327-6261



Pollution Prevention Institute

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