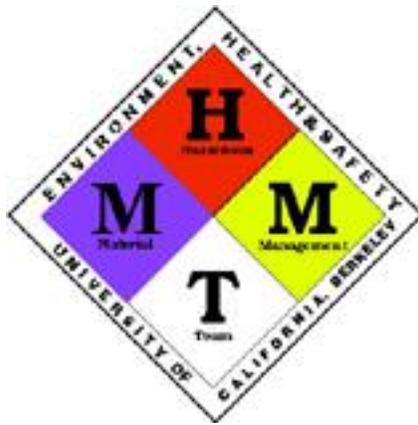


University of California, Berkeley

Training Plan for Hazardous Materials Employees



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UC Berkeley is subject to Hazardous Materials Business Plan and certain Hazardous Waste Generator regulations. This written employee training plan (Plan) meets the requirements of Health and Safety Code Section 25504(c), Title 19 Section 2732, Title 22 Section 66265.16 and 49 CFR Subpart H for employees who ship or transport hazardous materials.

1. Scope

This Plan is applicable to all UC Berkeley employees who have job responsibilities involving any of the following activities:

- a) Using or managing hazardous materials
- b) Generating, treating or managing hazardous wastes
- c) Responding to hazardous materials spills or releases
- d) Packing or shipping hazardous materials through Fed Ex or other shipping service
- e) Transporting hazardous materials or waste in University vehicles on public roads
- f) Testing or maintaining equipment that is used to prevent or respond to hazardous materials spills and releases

2. Responsibilities

The Associate Director of the "Environmental Protection Team" in the Office of Environment, Health & Safety is responsible for carrying out the provisions of this plan.

3. New Employees

New employees are supervised by a trained individual until their training is complete. Training includes at least the following:

- a) New employees who use or manage hazardous materials are required to take the on-line "Hazardous Materials Spill Response Training," read and sign the laboratory's Chemical Hygiene Plan and attend a one-time "Laboratory Safety Training" which is classroom training conducted by EH&S staff.
- b) New Employees who generate or manage hazardous wastes:
 - i. in Laboratory Accumulation Areas take the on-line "Hazardous Waste Program" training prior to generating hazardous waste. Refresher training is not required. Employees also take "Hazardous Materials Spill Response" training within six months of being hired.
 - ii. in Central (90-day) Accumulation Areas receive initial, on-the-job Hazardous Waste Generator Training within six months of being hired.
 - iii. who are operating or maintaining permitted hazardous waste treatment tanks receive initial, on-the-job Hazardous Waste Generator Training within six months of being hired.
 - iv. in the office (record keeping only) receive on-the-job training within six months of being assigned any duty involving compliance with Title 22 and DOT hazardous materials/waste requirements.
- c) New Employees who respond to hazardous materials spills or releases receive classroom, 24-hour Hazwoper training within six months of being hired.
- d) New Employees who pack or ship hazardous materials through a shipping service, or who sign manifests, Bills of Lading or other shipping papers, must take the on-line "Hazardous Materials

Shipping General Awareness" training prior to conducting such activities. *How do they get function-specific training?*

- e) New employees who transport hazardous materials or wastes in University vehicles on public roads, or who sign manifests, Bills of Lading or other shipping papers, receive Department of Transportation (DOT) training prior to conducting such activities as follows:
 - i. General awareness/familiarization to raise the hazmat employees' awareness of DOT's Hazardous Materials Regulations .
 - ii. Function-specific training to teach the knowledge, skills and abilities for packaging, labeling, marking and transporting hazardous materials safely and legally.
 - iii. Security Training to provide an awareness of security risks associated with hazardous materials transportation and methods designed to enhance transportation security.
- f) New employees whose duties include the testing or maintenance of equipment that is used to prevent or respond to hazardous materials spills and releases receive on-the-job training which includes instruction on manufacturers' written operating procedures.

5. New Assignments and Changes in Operations for Employees

In the event of a new assignment or a change in facility operations that affect the way employees handle hazardous materials or hazardous waste, appropriate training is provided to the affected employees before the new assignment or the change in operation takes place.

6. Refresher Training

- a) Employees who generate or manage hazardous wastes in Central (90-day) Accumulation Areas receive annual, classroom refresher training. EH&S employees also read and sign a safety "tail-gate" sheet at the start of each shift.
- b) Employees who use hazardous materials in laboratories and shops retake the on-line "Hazardous Materials Spill Response" every year.
- c) Employees who respond to hazardous materials spills or releases receive 8 hours of annual, classroom refresher training.
- d) Employees who pack or ship hazardous materials through Fed Ex or other shipping service take the on-line "Hazardous Materials Shipping General Awareness" training every three years.
- e) Employees who are operating, inspecting or maintaining permitted hazardous waste treatment tanks receive annual, classroom refresher training.
- f) Employees who transport hazardous materials or wastes in University vehicles on public roads receive annual, classroom refresher training every three years. This includes DOT HM-181 General awareness/familiarization and function-specific training. A record of current training, inclusive of the preceding three years, is retained for each hazmat employee for as long as that employee is employed as a hazmat employee and for 90 days thereafter.

7. Training Topics

Facility personnel who handle hazardous materials are trained in the following (per Health and Safety Code Section 25504(c) and Title 19 Section 2732):

- Packaging and labeling
- On-site management and storage requirements
- Proper use of safety equipment
- Off-site transportation requirements
- Key parameters for automatic waste feed cut off systems
- Response to groundwater contamination incidents
- Shutdown of operations

Since some UC Berkeley facilities generate hazardous waste, we provide training in hazardous waste management for all workers who handle hazardous waste (22 CCR Section 66265.16). The training includes the following topics:

- Packaging and labeling
- On-site management and storage requirements
- Proper use of safety equipment
- Proper use of hazardous waste management supplies
- Off-site transportation requirements
- Interaction with waste haulers and disposal sites
- Conducting periodic inspections
- Key parameters for automatic waste feed cut off systems (if applicable)
- Response to groundwater contamination incidents (if applicable)
- Shutdown of operations (if applicable)

8. Training Documentation

Employee training is documented. Training record sign-in sheets are scanned and filed electronically on the EH&S server. In addition, training is tracked and recorded on-line through the UC Berkeley "Learning Management System." Hazardous waste training records on current employees are kept indefinitely. For former employees, training records are kept for at least three years from the date the employee last worked at UC Berkeley.

DOT training records include: (1) the hazmat employee's name; (2) the most recent training completion date of the hazmat employee's training; (3) a description, copy or the location of the training materials used to meet the requirements; (4) the name and address of the person providing training; and (5) certification that the hazmat employee has been trained and tested.

9. Additional Training Requirements

In addition to the documentation listed above, UC Berkeley maintains Job Descriptions for employees involved in hazardous waste management and handling. Job descriptions include:

- the job titles of employee(s) handling hazardous waste; and
- the required education, qualifications and duties of employees assigned to handle hazardous waste.

Hazardous Waste Technicians must graduate from high school or a have General Education Diploma and two years of experience in an environmental health and safety program. Or they may have two years of college including appropriate science courses and one year of experience in an environmental health and safety program; or an equivalent combination of education and experience.