

**State of Wisconsin
Annual Hazardous Materials and Waste Disposal Awareness Training
Frequently Asked Questions (FAQs)**

January 2010

1) Q: Why did I have to come to this training?

A: The course instructors are not able to answer this question without knowing what duties each attendee actually performs in their workplace.

There are several reasons why an employee has been sent to the training. It's up to your supervisor to determine what training is required for your specific job duties.

Specifically this training is designed to meet state regulatory requirements outlined in Wisconsin Administrative Code sections NR 662.192 (e) 3 for Small Quantity Generators of Hazardous Wastes and section NR 673.16 for Small Quantity Handlers of Universal Wastes.

The course announcement includes a listing of job duties that each agency should consider when deciding whom to send to the training. This list on the course announcement is not all inclusive and each agency is free to decide for themselves whether an employee should attend the training or not. **Whenever possible the supervisors of personnel that work with hazardous materials should attend this training along with their supervised employees.**

2) Q: Why not remove unnecessary topics so the class can be shorter?

A: Every year the training planning committee struggles to determine what to cover and what not to cover in this session. The training is first and foremost a tool to meet a regulatory requirement for employees who work at facilities that generate hazardous wastes. Specifically this training is designed to meet state regulatory requirements outlined in Wisconsin Administrative Code sections NR 662.192 (e) 3 for Small Quantity Generators of Hazardous Wastes and section NR 673.16 for Small Quantity Handlers of Universal Wastes.

The topics that deal with the proper disposal of wastes are mandatory topics that will be covered every year. In addition, basic U.S. Department of Transportation guidelines for tracking hazardous waste shipments and planning for emergencies that involve hazardous wastes are also annual mandatory topics.

Additional discretionary topics are also included in the sessions, but change from year-to-year. For 2005, discretionary topics included Responding to Simple Oil Spills, Integrated Pest Management and Proper Disposal of Pesticides. Discretionary topics for 2006 included Chemical Compatibility and Storage, Gas Cylinder Safety and Disposal and a module on Storm-water Management and Protection. Discretionary topics for 2007 included Physical Properties of Chemicals, Finding Information on a Material Safety Data Sheet (MSDS) and Chemical Product Receiving and Storage while in 2008/9 a section on planning for and conducting Community Clean Sweeps was added.

3) Q: For refresher training it shouldn't last all day, why not set up the training in blocks so people can attend only the sessions they need or that apply to their workplace?

This is a suggestion that has come up several times over the years. In an attempt to make the training as useful and accessible as possible to the maximum number of eligible individuals, the committee decided to open up the sessions for the 2010 training season. Under the new format, individuals that are familiar with their own training requirements can attend only the session(s) they need to refresh their credentials. Individuals will receive a training certificate that is stamped to indicate the session or sessions they attended.

This primarily applies to the morning sessions that deal with the topics of Universal and Hazardous Wastes. For employees who work at facilities that generate Universal and Hazardous Waste, the sessions that cover these topics are mandatory annual training requirements under state and federal regulation. Question 2) includes the specific regulatory citation on training requirements for waste handling employees working at facilities that generate these types of wastes.

For attendees that have never been to a waste training session and are attending to receive initial training, it is recommended that they attend the entire session.

All of the topics covered throughout the day are geared towards finding information and resources to assist personnel with waste disposal decisions. The sessions covering Physical Properties of Chemicals and Finding Information on a MSDS are especially valuable for new Environmental Health and Safety personnel that must make waste disposal decisions as part of their job responsibilities.

4) Q: Why not give the class to each agency separately?

A: The multi-agency format is the best way to get the most out of the money spent to develop and present the training. The goal of this training is to bring employees to the Awareness Level with regard to their ability to recognize hazardous materials in the workplace and report to their chain of command when they see potentially unsafe situations such as improper storage, damaged containers/spills, or old/outdated or surplus hazardous materials that have special disposal requirements. While in some cases an agency may have additional training(s) that cover specific agency operational policies, each of the agencies have similar basic regulatory requirements with regard to proper use, storage and disposal of hazardous materials while conducting normal operations and maintaining buildings and grounds.

5) Q: Why not change the topics every year to make the training more interesting?

A: See the answer to question 2 for a discussion of mandatory vs. discretionary topics. In addition, for mandatory topics the planning committee makes an effort every year to rearrange the material, insert new pictures and film clips, and provide unique examples and exercises so individuals who attend in subsequent years will not always hear repeat information. **In addition, attendees are encouraged to bring questions and examples from their workplace to stimulate class discussion.**

Ultimately it is unavoidable that persons who attend the training more than once will hear some repeat information. However, repetition is the key to understanding some of the regulatory requirements regarding proper management of hazardous materials and hazardous wastes.

6) Q: Why not cover other topics that cover regulatory requirements for state employees such as Driver Rules of the Road Training and Confined Space Entry?

A: This training was designed to address a specific need for training that is not currently available to state employees through other venues. The authority for the training comes through the execution of the statewide contract for the removal, transportation and disposal of the State's hazardous waste. Because there are also regulatory requirements regarding the training of state employees involved in the generation and disposal of hazardous wastes, the training was developed first and foremost to address these requirements. Veolia (formerly Onyx) Environmental Services was chosen to provide instructors for the training as part of their contract with the State of Wisconsin of hazardous waste services.

7) Q: Why not make the sessions longer or split into two days to cover the material more thoroughly?

A: Sessions are set up to allow for all attendees in the area to reach the training venue and return to their workplace or home within normal working hours. With a total block of 8-1/2 hours (including lunch), 90 minutes are delegated on each end of the training to allow for travel time. In general, compensatory time or overtime hours should not be needed to travel to and attend this training. It's up to each agency to determine under what conditions compensatory time will be awarded to employees that wish to attend a session that is more than a 90 minute drive from their workplace.

Because the goal is to train state personnel to the awareness level, a five hour session is adequate to achieve this level of proficiency. Overnight stays for state employees are also cost prohibitive under current budgetary constraints.

8) Q: Why don't you provide coffee, donuts or other refreshments?

A: While the provision of refreshments at each of the training session would be nice to do, the cost for the state to provide these types of refreshments is prohibitive. Between 500 and 550 people attend the training each year. The only way this could be provided consistently to all venues would be through local catering services. Setting up these services also creates logistical and organizing problems in getting food service to each training site (and many of the venues will only allow the use of their on-site food services).

Each training venue does have a cafeteria, vending machines or both available on site. Each student can feel free to bring their own refreshments to the class. One of the reasons why a second Madison session was moved to the Mendota Conference Center from the Dept. of Military Affairs (DMA) headquarters building is because food and drink are not allowed in the DMA auditorium.

9) Q: Why was Veolia Environmental Services (VES) chosen to provide the instructors for the training?

A: In 2005 and again in 2008, VES participated in a competitive proposal process whereby they were selected to be the State of Wisconsin's contract vendor for disposal of hazardous wastes. As an additional service to the state under their contract, VES also provides regulatory training that is required for state agencies that generate hazardous wastes at a waste generation rate of Small Quantity Generator or greater.

At no time during the training session are the instructors trying to sell additional services to attendees. While some mention may be made as to what services are available under the states contract with VES, in many cases the instructors are giving advice on how to reduce workplace wastes. Many of the waste management practices provided in the training actually result in the production of less hazardous waste and less waste disposal business for VES under the state contract.

10) Q: The notice I received from my agency indicated an 8:00 am start time, however when I arrived at the training facility I found out the training does not begin until 9:00 am. Why the confusion regarding the start time?

A: The official training agenda is printed on the Course Announcement form. In addition, the start and end times for the training are also printed on the registration confirmation information that is received upon registering on the Veolia website. In addition, maps for each training venue as well as parking and classroom location instructions are also available for downloading from the Veolia website.

In some instances, one person performs the registration process for multiple employees. In these cases, it is important that the person that does the registration pass along the registration confirmation form along with venue directions to each person who will be attending the training. If an agency chooses to create their own version of the training notice, it is important that they transcribe the information accurately from the official information source.

Registration for the training can begin as early as 8:30 am, but the official start time for the training is 9:00 am.

11) Have you considered having some of the mandatory topics covered in a computer based training format whereby a person could fulfill their regulatory training requirements without attending a class.

Please see the evaluation form. We are asking attendees for feedback on whether a computer based format in future years would better meet their training needs. In the computer based format, the student will self-conduct the training at a computer station while the program tracks their progress. A certificate is issued when all sections of the training module have been completed.

Training in computer based formats have become more and more common in the industry as employers look for more efficient ways to convey required regulatory information to

their employees. The sessions that would be most adaptable to the computer based format include the mandatory topics of Universal and Hazardous Waste Management. Please indicate on the evaluation for whether you feel that these types of training modules would be useful to you or your agency.

More questions and answers will be added to this list as they come up.