

## Chapter 8. Training, Inspections, and Recordkeeping

### References:

- 29 CFR 1910.120 (hazardous waste operations and emergency response – HAZWOPER)
- 40 CFR Part 262 (hazardous waste standards)
- 40 CFR Part 265.16 (training requirements for hazardous waste handlers)
- 49 CFR Part 172.704 (training requirements for hazardous material handlers)
- 49 CFR Part 177.800 (training requirements for shipping of hazardous materials)
- 49 CFR Part 177.816 (hazardous materials training requirements for drivers)
- OAC 3745-52 (hazardous waste generator standards)
- OAC 3745-65-16 (training requirements for hazardous material handlers)
- AR200-1, *Environmental Protection and Enhancement*, Chapter 9 (hazardous materials)
- AR 200-1, *Environmental Protection and Enhancement*, Chapter 10 (hazardous waste)
- DoD 4500.9-R, *Defense Transportation Regulation, Part 2* (transportation of munitions)
- Technical Manual (TM) 38-410, *Storage and Handling of Hazardous Materials*
- Executive Order 13693, *Planning for Federal Sustainability in the Next Decade* (energy efficiency and waste minimization)

This chapter provides information, instructions, and forms for required training, periodic internal inspections, and record keeping.

### Topics covered in this chapter include:

8.1	Required Training.....	8-2
8.2	Inspections.....	8-5
8.3	Recordkeeping.....	8-8
8.4	Reporting.....	8-9

## 8.1 Required Training

The following EPA, DOT and OSHA regulations require certain personnel to be properly trained when transporting or working with HM and/or HW.

- HW Management (EPA): 40 CFR 265.16 (OAC 3745-65-16) requires facility personnel to successfully complete classroom or on-the-job (OTJ) training that teaches them to perform their duties and ensure compliance at the facility.
- HM Management (DOT): 49 CFR 172.704 requires employees handling HM to undergo general awareness/familiarization training, function-specific training, and safety training.
- HM Transportation (DOT): 49 CFR 177.800 and 177.816 require drivers that transport HM to be properly trained in safety and vehicle operation.

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**Note:** OHARNG must also abide by DOD regulations for HM transportation.

DOD 4500.9-R, Chapter 204, Section E, Paragraph 1(a) states that “All personnel involved with the preparation and shipment of HM for commercial or surface military transportation must receive training IAW 49 CFR 172.704 and DOD Component regulations”.

DOD 4500.9-R, Chapter 204, Section E, Paragraph 1(b) states that “persons who certify HM on shipping papers, GBL, CBL, or DD Form 836 by any mode of transportation, military or commercial, and conduct function-specific training for subordinate personnel must successfully complete an approved hazardous materials certification course from one of the DOD schools”.

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- HW Operations and Emergency Response (HAZWOPER) (OSHA): 29 CFR 1910.120 (q)(6) requires an appropriate training level for employees expected to participate in HM clean up.
  - Hazard Communication (HAZCOM) (OSHA): 29 CFR 1910.1200(h) requires facilities to train their employees about hazardous chemical exposure in the workplace.

The following outlined training program addresses HW management, OSHA, and spill-response training requirements. It also addresses DOT HM management and transportation requirements.

## Hazardous Waste Management Training

**Note:** OHARNG personnel, including Traditional Guard members, who are responsible for handling or managing HW must complete training requirements before working unsupervised in a waste management position.

Federal and state HW training requirements do not apply to CESQGs. However, as a best management practice, the OHARNG requires personnel who handle HW at CESQG facilities to meet these training requirements.

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## Unit Environmental Compliance Officers and Maintenance Shop Supervisors

UECOs in maintenance operations are appointed by their supervisors to ensure that the facility is adhering to all environmental requirements, including HW management regulations. At FMSs and the UTES, Shop Chiefs should appoint someone to perform this function. At the CSMS, the superintendent appoints someone to perform this function. At AASFs, the Flight Facility Commander appoints someone to perform this function.

ECOs in maintenance operations and others who handle HW must successfully complete an HW training course. This course will be conducted by the Environmental Office. The training must describe proper handling and emergency procedures appropriate to the type(s) of HW generated by the activity, as well as information on how to comply with environmental federal, state, local, and Army regulations.

Training should address the following areas:

- Identifying and classifying HW
- Establishing and maintaining HW accumulation sites
- Labeling tanks and containers of HW
- Inspection procedures
- Recordkeeping
- Completing applicable forms
- Preventing and responding to spills

Personnel who handle HW must complete their training before they assume their duties, and must attend an annual refresher course thereafter.

### Other Hazardous Waste Personnel

ECOs and Shop Chiefs must ensure that personnel who handle or manage HW receive required training on HW management procedures identified within this plan (including emergency response procedures). Initial training should be provided within six months of employment or assignment. In addition, there must be annual refresher training. It must be recorded and documented in the facility's training records.

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**Note:** Documentation should also be placed in the HM/HW Management Binder.

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### Hazardous Material Training

HM personnel must successfully complete general awareness and familiarization training, function-specific training, and safety training upon assignment and then annually thereafter.

### HM Transportation

Persons who transport, load, or unload HM must have the following DOT training:

- Initial training on HM packaging, labeling, marking, preparing shipping papers, and placing vehicle placards.
- Refresher training—required by DOD every two years

Only persons who have attended one of the following schools may certify the DD Form 836 (Shipping Paper):

- U.S. Army Ordnance Center and School
- 345th Technical Training Flight
- Naval Supply Corps School
- USACE Professional Development Support Center
- Defense Ammunition Center

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**Note:** Maintain a roster listing those personnel in each unit and shop approved to transport HM. The roster could also be kept in this plan's binder.

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DCSLOG-CTO maintains a list of certified personnel who have completed "HM Familiarization and Safety in Transportation" training.

## Hazard Communication

Personnel who work with hazardous materials in the workplace are required by OSHA to have “Hazard Communication” or “Worker-Right-to-Know” training. This training is required:

- At initial job assignment
- Whenever workplace hazards change that may have a major effect on the HM type and quantity used and stored

## Emergency Response

Persons assigned to Installation Response Team (IRT), Spill Response, or HM teams are required to have annual training. This training may include the following topics:

- Proper use of PPE
- Use of emergency equipment
- First aid
- Use of communications and alarm systems
- Emergency notification procedures and actions
- Response to fire and explosion
- Shut-down procedures
- Decontamination procedures

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**Note:** Training requirements vary depending on assigned duties or response levels and are detailed in a Spill Prevention Control and Countermeasure (SPCC) Plan or an Installation Contingency Plan (ICP). Requirements may include annual spill training exercises.

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## Training Records

Training of personnel must be recorded on HM/ HW Training Record Form, AGOH Form 200-1-14-R (see Appendix C). Make copies of these documents to keep in the HM/HW Management Binder. Send a copy of the completed form to the Environmental Office.

## 8.2 Inspections

All OHARNG activities must conduct and record self-inspections of HM storage and HW accumulation areas. These inspections are described in this section.

### **HW Accumulation Areas**

All FMSs, the AASFs, the USPFO Warehouse, and the CSMS are required to conduct weekly inspections of SAAs and GAAs. Supervisor must ensure that HW SAA and GAA inspections are annotated on either the Satellite Accumulation Area (AGOH Form 200-1-13-R) or the Generator Accumulation Area (AGOH Form 200-1-12-R) inspection form (see Appendix C). Inspection records must be maintained in the HW section of the HW/HM Management Binder. Inspection requirements for facilities at the Camp Ravenna Joint Military Training Center (CRJMTC), to include the UTES, are outlined in the CRJMTC Hazardous Waste Management Plan.

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**Note:** CESQGs are not required to conduct inspections of their HW accumulation areas. However, as a best management practice, the OHARNG requires CESQGs to conduct weekly inspections of their SAAs and GAAs. CRJMTC is an LQG. HW management requirements for LQGs are much more stringent.

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### **HM Storage Areas**

All FMSs, the AASFs, the USPFO Warehouse, and the CSMS are required to conduct weekly inspections of HM storage rooms, buildings, cabinets, racks, etc. Units are required to conduct monthly inspections of HM storage areas under their direct control. State Maintenance Repair Workers are also required to conduct monthly inspections of HM storage areas under their direct control. Supervisors must ensure that HM storage area inspections are annotated on the Hazardous Material Storage Unit (AGOH Form 200-1-11-R) inspection form (see Appendix C). Inspection records must be maintained in the HM section of the HM/HW Management Binder. Inspection requirements for facilities at the Camp Ravenna Joint Military Training Center (CRJMTC), to include the UTES, are outlined in the CRJMTC Hazardous Waste Management Plan.

### **Motor Vehicle Storage Compounds**

All FMSs, the AASFs, the USPFO Warehouse, and the CSMS are required to conduct weekly inspections of their motor vehicle storage compounds. All other OHARNG units/activities are required to conduct monthly inspections of motor vehicle storage compound areas under their direct control. Vehicles must be visually inspected for Class 2 or Class 3 leaks. Drip pans must be used to contain Class 2 and Class 3 leaks (see Chapter 9). The perimeter of the compound must be inspected for staining or free product. Spill response and reporting requirements must be initiated immediately upon the discovery of free product (see Chapter 9). Motor vehicle storage compound inspection records must be maintained in the spill section of the HW/HM Management Binder.

**Semiannual Assistance Visits**

OHARNG FMSs, AASFs, the UTES, the CSMS, and the USPFO Warehouse will receive semiannual assistance visits by the HWM. The intent of the visit is to identify and correct compliance deficiencies prior to internal and external EPAS audits. The visit is also an opportunity for shop personnel to identify ask questions and request additional support. The HWM will use the Environmental Compliance Checklist, AGOH Form 200-1-15-R (see Appendix C) to document the visit. The HWM will leave a completed copy of the checklist with the UECO and Shop Chief. Assistance visit records will be kept in the Environmental Programs Binder.

**EPAS Assessments**

Internal EPAS assessments, performed by EPAS assessors from the Environmental Office, will be conducted at all OHARNG FMSs, the AASFs, the UTES, the CSMS, and the USPFO Warehouse annually. CRJMTC, CPJTC, and CSJTC will also be assessed by Environmental Office annually. One-third of all OHARNG units will be assessed internally by the Environmental Office annually. Units/Activities may also request an EPAS assessment at any time. External EPAS assessments, performed by National Guard Bureau’s Environmental Division, will be conducted every three to five years. All federal facilities and a select number of state facilities will be assessed. The number and type of facilities assessed during the external assessment depend on the resources available, current compliance risk, and past assessment results (internal and external). EPAS assessments are conducted using an EPAS checklist. Assessments result in findings posted to a database of record called WEBCASS. The findings are also posted on the unit’s environmental homepage and the EPAS homepage on TAGNet. EPAS records must be maintained in the Environmental Programs Binder.

All OHARNG activities are also subject to external EPAS assessments conducted by the Army National Guard’s Environmental Division (ARNG-ILE). The EPAS assessor will use the internal EPAS checklist. All findings will be written and posted by the assessor following the EPAS assessment. Keep the facility’s copy of the posted finding in the HM/HW Management Binder. OHARNG units/armories will receive an internal EPAS assessment approximately every 3 years, or by request.

All OHARNG activities and units are also subject to inspections conducted by state and federal regulatory agencies. Local governments may also inspect for compliance with permits, local codes, or other regulations.

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**Note:** All OHARNG activities and units must contact the Environmental Office immediately upon receipt of any correspondence from local, state, or federal regulatory agencies. Failure to respond in a timely manner to a regulatory agency may result in enforcement action and fines.

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Notify the JOC immediately upon completion of the inspection at 1-888-637-9053. Immediately place a follow-up phone call to the Environmental Office at 614-336-7095 or 614-336-7395 after notifying the JOC.

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**Note:** Any incident requiring a report to an external agency must be reported by 0800 the following day (TAG Information Requirement #4).

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Send an e-mail to the Environmental Office containing all pertinent details of the visit. Attach copies of all inspection records, notes, or other correspondence left by the regulator. Forward original inspection records to the Environmental Office within 24 hours. Keep any records of these inspections in the Environmental Programs Binder.

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**Note:** Inspectors from external agencies are authorized to conduct inspections at all state and federal facilities. They must present their credentials upon request. Although most regulators will communicate openly with you and answer any questions you may have, they are not required to divulge the reason for the inspection. Treat the inspector with respect. Comply with their requests to the greatest extent possible. Do not offer more information than what's requested by the regulator.

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### 8.3 Recordkeeping

UECOs and/or Shop Chiefs must ensure that all necessary HW and HM records, plans, and files pertaining to their unit or facility are prepared, maintained, and updated. These records must be maintained in either the HM/HW Management Binder or the Environmental Programs Binder. Copies of all records covered in this chapter may also be posted to the unit's environmental homepage for quick and easy access. Contact the Environmental Office for assistance. When not otherwise specified, records must be retained for three years.

#### Hazardous Material/Hazardous Waste Management Binder

All OHARNG units or facilities that are HM and/or HW handlers must establish and maintain a HM/HW Management Binder (or series of binders). The binder should contain three sections: 1) HM records; 2) HW records; and 3) spill records. The binder(s) must include at least the following items:

##### **Hazardous Material Section:**

- Hazardous Materials Inventory Forms (see Chapter 3)
- Request for Issue or Turn-In Forms DA Form 2765-1 (see Chapter 6)
- Hazardous Material Shipping Papers DD Form 836 (see Chapter 6)
- Hazardous Material Storage Unit Weekly Inspection Form (see Chapter 8)
- Hazardous Material/Hazardous Waste Training Report (see Chapter 8)

**Hazardous Waste Section:**

- Waste profile sheets, waste characterization information, or laboratory analyses (when performed) as provided by the Environmental Office
- Container Logs (see Chapter 5)
- Hazardous Waste Generator Status Log (see Chapter 5)
- Hazardous Waste Turn-In Forms (see Chapter 6)
- Satellite Accumulation Area Weekly Inspection Checklist (see Chapter 8)
- Generator Accumulation Area Weekly Inspection Checklist (see Chapter 8)
- Hazardous Material/Hazardous Waste Training Report (see Chapter 8)
- HWM’s Environmental Compliance Checklist (see Chapter 8)

**Spill Section:**

- Emergency Information Form (see Chapter 3)
- ISCP (and any records required under that plan)
- SPCC Plan (and any records required under that plan)
- Completed Spill Incident Report Forms (see Chapter 9)

**Environmental Programs Binder:**

- EPAS Findings
- Training Records
- Appointment Orders

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**Note:** Keeping training records and appointment orders in a single Environmental Programs Binder is a best management practice that makes inspections and assessments much faster and easier for all parties involved.

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**8.4 Reporting**

All units and facilities are required to submit reports (with supporting records and documents to the Environmental Office upon request. These reports may include copies of all inventory sheets, container logs, and inspection sheets.