

Hazmat Training Definitions, including DOT and RCRA per OSHA, EPA, and DOT Compliance



Regulatory Standards

DOT: 49 CFR Part 172, <https://www.ecfr.gov/current/title-49/part-172>

EPA: 40 CFR Part 262 Subpart A, <https://www.ecfr.gov/current/title-40/part-262/subpart-A>

OSHA: 29 CFR 1910.120, <https://www.ecfr.gov/current/title-29/section-1910.120>

Hazmat Employees Regulatory Definition:

Definition from 49 CFR (171.8) means a person who employs or uses at least one **hazmat employee** on a full-time, part-time, or temporary basis; and who:

- Transports hazardous materials in commerce;
- Causes hazardous materials to be transported in commerce; or
- Designs, manufactures, fabricates, inspects, marks, maintains, reconditions, repairs or tests a package, container, or packaging component that is represented, marked, certified, or sold by that person as qualified for use in transporting hazardous materials in commerce

Hazmat Employee:

Definition from 49 CFR (171.8) means a person who is employed by a hazmat employer and who, in the course of employment, directly affects hazardous materials transportation safety. This term includes **an owner-operator of a motor vehicle which transports hazardous materials in commerce**. Per § 171.8, a "hazmat employee" is defined as a person employed by a hazmat employer and who, in the course of their employment, loads, unloads, or handles hazardous materials; designs, manufactures, fabricates, inspects, marks, maintains, reconditions, repairs, or tests a package, container or packaging component that is represented, marked, certified, or sold as qualified for use in transporting hazardous material in commerce or directly affects hazardous materials transportation safety.



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Training:

DOT:

<https://www.phmsa.dot.gov/training/hazmat/hazmat-transportation-training-requirements>

Personnel training is required for employees who are considered Hazmat Employees within the first 90 days of employment (unless working under the direct supervision of a trained Hazmat Employee), and at least every three (3) years.

EPA:

<https://www.epa.gov/hwgenerators/hazardous-waste-generator-regulatory-summary>

Depending on Generator status, Hazmat Employees of Generators must have periodic training. (SQG: Initially and Periodically, LQG: Initially and at least every two (2) Years

Incident/Emergency Training:

Employees who meet the definition of Hazmat Employee who will require employees to respond in the event of a hazmat emergency related to a spill (Response requiring more than isolation and notification) may need the following training per OSHA 29 CFR 1910.120:

- **Initial Training, 191010.120(e)(3), and at least 8-hour Refresher Annually thereafter as required in 191010.120(e)(8):**

In order to determine specifically which training the employees under this regulation need, please check the box that corresponds with what operations the employees will perform:

Employees:

- (1)**General site workers** (such as equipment operators, general laborers and supervisory personnel) engaged in hazardous substance removal or other activities which expose or potentially expose workers to hazardous substances and health hazards shall receive a minimum of **40 hours** of instruction off the site, and a minimum of three days actual field experience under the direct supervision of a trained, experienced supervisor.



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(2)**Workers on site only occasionally** for a specific limited task (such as, but not limited to, ground water monitoring, land surveying, or geo-physical surveying) and who are unlikely to be exposed over permissible exposure limits and published exposure limits shall receive a minimum of **24 hours** of instruction off the site, and the minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor. **Note:** If at any point after this training, these employees become General Site Workers (see first bullet point), or are required to wear respirators, they will need an additional 16 Hours of training as they will fall under General Site Workers.

(3)**Workers regularly on site who work** in areas which have been monitored and fully characterized indicating that exposures are under permissible exposure limits and published exposure limits where respirators are not necessary, and the characterization indicates that there are no health hazards or the possibility of an emergency developing, shall receive a minimum of **24 hours** of instruction off the site and the minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor. **Note:** If at any point after this training, these employees become General Site Workers (see first bullet point), or are required to wear respirators, they will need an additional 16 Hours of training as they will fall under General Site Workers.

If selecting one of the 24 Hours Above, see below for additional training required by the standard:

Management and Supervisor Training:

On-site management and supervisors directly responsible for, or who supervise employees engaged in, hazardous waste operations shall receive **40 hours initial training**, and **three days of supervised field experience** (the training may be reduced to **24 hours** and **one day** if the only area of their responsibility is employees who fall under sections 2 and 3 above, and at least **eight additional hours** of **specialized**



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training at the time of job assignment on such topics as, but not limited to, the employer's safety and health program and the associated employee training program, personal protective equipment program, spill containment program, and health hazard monitoring procedure and techniques.

