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Dangerous Waste Training Plan

Introduction

This plan has been prepared to document training of personnel affiliated with Western Washington University (WWU) in the requirements of dangerous and universal waste handling. Personnel training documented below is intended to be in accordance with the Washington Administrative Code (WAC), Part 173-303-330.

Training Requirements

All WWU personnel involved with dangerous or universal waste generation, handling, storage or disposal must be trained in applicable dangerous or universal waste management procedures.

Western provides a program of classroom instruction and/or on-the-job training for facility personnel. This program teaches personnel to perform their duties in a way that ensures Western's compliance with WAC Chapter 173-303. It teaches facility personnel applicable dangerous waste management procedures including contingency plan implementation which are relevant to the positions each person holds. It ensures that appropriate personnel are able to respond effectively to emergencies and includes required elements in WAC 173-303.

WWU personnel are trained in applicable dangerous waste management procedures within six months after their employment at or assignment to a position involved with dangerous or universal waste. Employees are appropriately supervised until they complete the training program. Training program reviews are conducted annually.

Western's dangerous waste training program is under the direction of the Environmental Health and Safety director. S/he is knowledgeable in dangerous waste management procedures.

Training is relevant to the positions held as shown in WWU's University-wide Procedure U5950.01C, Training for Dangerous Waste Management (Attached). Each person receives applicable aspects of the following requirements:

1. Trained in a way that complies with WAC 173-303-330, Dangerous Waste Regulations.
2. Able to respond effectively to emergencies.
3. Participate in an annual review of the training provided in the program.
4. Be familiar with emergency equipment, systems and procedures.
5. Understand procedures for inspecting, using, repairing and replacing emergency and monitoring equipment where applicable.
6. Understand communications or alarm systems.
7. Respond to fire or explosions where applicable.
8. Respond to ground-water contamination incidents where applicable.
9. Provide shutdown operations and respond when shutdown operations occur, as necessary.

Written Training Plan

This written dangerous and universal waste training plan is kept at WWU. It is on the WWU Environmental Health and Safety website located at <http://www.wvu.edu/depts/ehs/>. The links to Environmental Services and Chemical Waste lead to the plan webpage. This plan includes the information required in WAC 173-303.

WWU Positions and Written Descriptions of Training

Employee positions at WWU fall into four categories: classified, exempt professional, faculty and student employee. Classified positions follow the State of Washington personnel job descriptions. These are available to WWU employees from a link at the WWU Human Resources website located at: <http://www.acadweb.wvu.edu/hr/>.

Each employee position at WWU has a desk description provided by the supervisor. Dangerous waste duties are delineated in the desk descriptions. These desk descriptions include the requisite skills, education and other qualifications and duties for each position. Desk descriptions are available for classified and exempt staff from the WWU Human Resources Department, for faculty from the University's Provost's Office and for student workers from the hiring department on campus. Environmental Health and Safety (EHS) office desk descriptions are available from the EHS director.

Students receive dangerous waste management training from instructors or teaching assistants. This information is part of their coursework and is documented in the instructors' written course materials or other departmental materials.

Written descriptions of the type and amount of both introductory and continuing training required by WAC 173-303 are maintained in WWU Procedure U5950.01C. Continuing training topics are identical to the introductory training although the manner of training delivery may differ.

In addition to Procedure U5950.01C, the WWU EHS office maintains a list of required training by department for each calendar year as a guide. Dangerous waste training is included on this list. It is available from the director upon request.

Training Records

The EHS office maintains records documenting that facility employees have received and completed training required by WAC 173-303. The records generally include the employees' initials or signature verifying that training was received.

Training records of current personnel are kept until closure of the University or until no dangerous or universal waste is generated. Training records for former employees are kept for at least three years from the date the employee last worked for WWU. Student class information is maintained in the Banner student database and is permanently archived electronically. Instructors' class materials are maintained by individual instructors. Personnel training records may accompany personnel transferring within WWU.