



**A Defense Industry
Guide to Procuring
Hazardous
Materials/Waste
Compliance Training**

*How to procure the appropriate Hazardous
Materials and Waste Compliance training for
military and DoD civilian personnel*



Procuring Hazardous Materials and Waste Compliance Training

How to procure the appropriate HazMat Compliance training for your military and civilian personnel.

Choosing The Right Training For Your Organization’s Needs

Environmental, health & safety (EHS) training requirements are often as confusing as the regulations with which they are intended to comply. Training required for those who handle hazardous waste is not the same for those who ship hazardous materials. Likewise, a course intended to comply with US Army regulations may not comply with those of the Navy, and certainly, courses intended for the private sector, would not meet the myriad regulatory and policy requirements of the DOD.

When seeking training to meet federal, DOD, or installation-specific requirements for those who generate hazardous waste, it is important to ensure that the course objectives meet those of the regulatory requirements.

Hazardous Materials and Waste Compliance Training

Under the Resource Conservation and Recovery Act (RCRA), EPA’s 40 CFR Parts 260 to 279; DoD Directive 4715.1, “Environmental Security;” and the associated Army, Navy, and Air Force instructions, personnel assigned to hazardous waste duties must successfully complete a program of classroom instruction that teaches them to perform their duties in compliance with the respective regulations.

The standard Hazardous Waste Operations and Emergency Response (HAZWOPER) 40-hour course is an OSHA based course intended for those who work on uncontrolled hazardous waste sites, and is not intended to comply with the EPA’s RCRA hazardous waste handling requirements.

To comply with regulations, those who handle hazardous waste, manage accumulation points, or work at a “less than 90 day” storage area, must attend training with the following objectives:

- a) Packaging, marking and labeling requirements;
- b) Cradle-to-grave tracking and manifesting;

- c) Reporting and record-keeping requirements;
- d) Small spill response and reporting requirements;
- e) Personal health & safety procedures;
- f) Storage requirements;
- g) Emergency response procedures;
- h) Hazardous waste minimization/substitution; and
- i) Unit training responsibilities.

The typical approach is a twenty-four hour course to convey the above objectives. Our 24-hour ***Hazardous Waste Handling Compliance Course*** is available in Army, Navy, and Air Force formats.

Many training officers and/or Installation plans have opted to combine training objectives. Our ***Hazardous Materials and Waste Generator Compliance Course*** is a forty-hour, that includes DOT HM 126F and HM 181 requirements, and is also available in Army, Navy, or Air Force formats.

Choosing The Right Training Provider

As important as choosing the right curriculum, you must ensure that those providing the training are qualified to do so. There are few regulatory obstacles preventing unqualified companies and individuals from promoting compliance training in the marketplace. It is up to the purchaser to ensure that their personnel are receiving training from qualified instructors.

Organizational/Course Credentials

US EPA Approval

For some curricula an organization can seek approval under The US Environmental Protection Agency's External Provider Program. A list of EPA Approved Providers is available from EPA Environmental Response Team.

Instructor Credentials

In addition to the conventional academic credentials available to environmental, health and safety professionals (i.e., BS, MS/MPH, PhD) there are several professional certifications that are widely accepted.

- Certified Hazardous Materials Manager (CHMM)
- Certified Industrial Hygienist (CIH)
- Certified Safety Professional (CSP)
- Professional Engineer (PE)
- Registered Environmental Manager (REM)

Purchasing Training

Laws and regulations governing the purchase of training

- The Government Employees Training Act (GETA),
- The Federal Acquisition Regulation (FAR), and
- The Defense FAR Supplements (DFARS).

Commanders, supervisors and other management officials who have been designated in writing to exercise delegated authority to approve training may use several methods to purchase training.

DD Form 1556

As a general rule, the process of requesting, selecting, approving, and purchasing training valued up to and including \$25,000 as a single purchase is exempt from formal contracting and acquisition procedures if it meets the definitions of “commercial” and “off-the-shelf” (5 USC 4105). The DD Form 1556 (Request, Authorization, Agreement, Certification of Training and Reimbursement) remains the authorized and required source document to purchase training not subject to contracting procedures.

Commercial Training Items:

Training courses, software, products, training conferences or instructional services customarily used for non-governmental purposes. The items are available to the general public and the Federal Government simultaneously, subject to similar terms and conditions.

Off-The-Shelf:

Course, program, or routine of instruction which presently exists and is available a commercial marketplace prices. Providers advertise standard features and costs of the item or service through established catalogs, schedules, or other public information sources. An item requiring minor modifications(s) resulting in no additional costs to the Government beyond the established, published prices, may still satisfy the criteria for designation as off-the-shelf.

(see 48 CFR 2.101)

Financial Management Regulation (DFMR), the FAR, DFARS, and local acquisition and contracting procedures.

Because private sector, as well as Government, organizations must comply with hazardous waste regulations, this training is available in the general marketplace and meets both “commercial training” and “off-the-shelf” definitions.

Vendors and training providers may include Government and non-Government sources. The non-Government sources include: business, commercial, or industrial firm; non-profit organizations; as well as universities, technical business, and vocational schools.

When an agency training course or program requires new design and development or the training is valued above \$25,000 for a single purchase, the purchase is subject to the Defense

Our consultants would be happy to discuss your training requirements, and the best options available to you. Please call us at (888) 408-0700, or visit us at our website www.gbkpartnership.com.