

# California Compliance School



California Compliance School (CCS) is an innovative, activity-based training program that will teach you the basics of complying with the confusing maze of environmental regulations in a fun and interesting format!

Using experts in the field of adult learning principles, the team of curriculum development specialists at CCS put together a performance-based program that addresses the most common questions and practices of environmental compliance for hazardous waste generators.

"Performance-based" means that, during the course of the class, you will learn what you need to know to apply these skills to your business operations. This keeps you in compliance, saves money through waste reduction, and may prevent you from getting fined!

As you can imagine, this format is dramatically different from sitting for eight hours in front of an instructor who lectures the whole time, without really giving you an opportunity to demonstrate that you have learned anything--or to practice what you may have learned.

The credit for the CCS concept goes to employees of the Department of Toxic Substances Control. They realized the need for basic hazardous waste management training but recognized that an institution of adult learning (a college) would be better equipped to develop and provide the training than a regulatory agency. Their vision was a "Traffic School" for hazardous waste generators, which would allow fines for certain violations to be "forgiven" by the DTSC and today that vision is a reality.

## Hazardous Waste Compliance Course Modules

Five Modules make up the basic Hazardous Waste Generator Training Program. All participants in CCS must successfully complete the first Module on basic generator responsibilities and liabilities before taking the others. Most Modules are four hours in length. Requirements for successful completion will be discussed at the start of each Module. Any required testing is conducted after the last Module you sign up for (Either IV or V). The five Modules are:

### Module I - Hazardous Waste Identification and Overview

- Why compliance with environmental laws is important; what are the risks for non-compliance?
- Where to get information on how to comply; how to identify if you are a Large or Small Quantity Generator.

- Who inspects facilities that handle, store, treat, dispose, or recycle hazardous waste in California and what laws and regulations are enforced
- What wastes are and how to classify them; the differences between RCRA and California- only wastes.
- Who is legally responsible for compliance and when this liability and responsibility begins and ends
- Basic onsite management requirements for generators; definition of "Point of Generation" (P.O.G.) for wastes
- What information is needed (lab analysis, processes, P.O.G.) to manage hazardous waste.

## **Module II - Onsite Management Requirements (Tanks and Containers)**

- How to determine whether a device is a tank or container and the management requirements for each, including secondary containment.
- How to manage your Hazardous Waste as a Universal Waste.
- What "accumulation" is and the difference between it and "storage"; satellite accumulation.
- Proper management of used oil and used oil filters, rags and wipes.
- How to correctly apply accumulation times to various volumes and types of hazardous wastes generated.
- How to fill out a hazardous waste label both for accumulation on-site and in preparation for transport.
- Management of empty containers.
- Lab wastes.

## **Module III - Transportation (Manifests and LDRs)**

- The requirements for transporting hazardous waste including how to complete the appropriate shipping documents - how to fill out a manifest and LDR forms.
- How to find registered transporters and permitted off-site facilities to send the waste
- How supplemental manifest documents relate to Land Disposal Restrictions (LDR's)
- Importing/Exporting hazardous waste
- DOT training requirements for the shipper
- 6 copies of a manifest- Who sends what copy where?

## **Module IV - Preparedness, Prevention and Training**

- The requirements for developing a hazardous waste Contingency Plan and an employee Training Program
- How to maintain adequate documentation of training; Can my OSHA training count?
- How to prepare and implement Contingency Plan and written employee Training Program;
- The requirements of the Source Reduction and Hazardous Waste Management Review Act of 1989 (SB14) How to fill out a required compliance checklist for waste minimization.

## **Module V - Forms for self-Audit, On-site Recycling and Tiered Permitting Requirements**

- How to use on-site audit forms for waste management compliance
- Recycling exemptions from needing a tiered permit
- What is considered "excluded recyclable materials" and not a hazardous waste!
- How to determine whether various activities are considered "treatment"; "sham recycling"
- The main differences and similarities of operating requirements for the three lower onsite tiers
- Notification and onsite management forms
- How to use on-site audit forms for waste management compliance

For more information visit

<https://www.kccd.edu/economic-workforce-development/california-compliance-school/about>

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