

# Environmental Compliance Training for Retail Professionals – Curriculum

This Curriculum covers the types of courses that are relevant, and in some cases required, in a retail environmental compliance program. It does not cover all potentially required training--which depend on the specific circumstances, including the jurisdiction, as well as store/corporate requirements. Courses will not apply in all settings, for example courses on storage tanks only apply to retailers with either above or below ground storage tanks.

The CRC will be developing some retail-specific courses for managers and staff in corporate (or possibly regional) offices who are tasked with developing and/or managing environmental compliance programs. The goal is to equip them with a general knowledge of the environmental laws that apply in a retail setting as well as specific knowledge of the regulations such as:

- The importance of compliance with the specific regulations in a retail setting.
- The requirements that are most relevant in retail.
- Examples of how the requirements apply in retail (for example, what products or situations are impacted).
- Examples of how to comply with the requirements in a retail setting.
- Other retail-specific information that will help them stay in compliance with the specific regulation.

The audience for the CRC training are not staff at the store level. Most, if not all, retailers have their own store specific processes and procedures and these store-specific operations cannot be captured in a general training. However, the training should help store management understand the overall environmental requirements and issues, identify gaps in their compliance programs, and help them develop or update their compliance programs.

The CRC training material will also be designed to help small and medium sized retailers who do not have many or any dedicated environmental staff. The training should help managers in these companies who have environmental compliance as one of their many duties, better understand the importance of compliance, requirements and the basics to help them get started on ensuring compliance at their stores.

This material is provided for information purposes only and should not be construed as legal, financial or other professional advice.

<i>Regulatory Area</i>	<i>Training Title</i>	<i>Description</i>	<i>Typical Audience</i>	<i>Mandatory</i>
<i>General</i>	Introduction to Environmental Regulations for Retail	Overview of environmental regulations that apply in the retail industry including air, water, waste, hazardous waste, and product standards. This introduction touches on the requirements that are most likely to apply in various retail settings such as stores, distribution centers, and transportation.	Retail staff responsible for the design or implementation of an environmental compliance program.	No
<i>Hazardous Waste</i>	Introduction to Hazardous Waste for Retail	Overview of hazardous waste regulations that apply in a retail setting. Introduces the regulatory definition of what waste is considered hazardous under the regulations and touches on the requirements for the management and storage of hazardous waste that applies in a retail setting.	Retail staff responsible for the design or implementation of an environmental compliance program or a hazardous waste management program.	No
	Hazardous Waste Management – Regulatory Requirements	Management of hazardous waste (specific elements depend on the facility’s generator status) with details on company- and facility-specific procedures.	Facility staff responsible for or who manage hazardous waste or who sign hazardous waste manifests.	Yes
	Hazardous Waste General Awareness and Company Procedures	Awareness of hazardous, universal and other special wastes and how the company manages them. Instructions on what can and cannot be thrown in the regular trash or poured down the drain and how the company expects all employees to handle hazardous, universal and other special wastes.	All facility staff	No
<i>Universal Waste</i>	Universal Waste Management	Overview of universal waste regulations that apply in a retail setting. Introduces: the regulatory definition of universal waste under the regulations; state-specific universal wastes such as paint, electronic waste, antifreeze, aerosol cans, and CRTs; and the management and storage of universal wastes that are common in a retail setting.	Retail staff responsible for the design or implementation of an environmental compliance program or a hazardous waste management program.	No
<i>Hazardous Materials Transportation</i>	DOT Hazardous Materials Regulations (HMR) Job-specific Certification	Employer must certify that every <i>hazmat employee</i> has familiarity with the general provisions of the HMR, is able to recognize and identify hazardous materials, has knowledge of specific requirements applicable to functions performed by the employee, and has knowledge of emergency response information, self-protection measures and accident prevention methods and procedures	Facility staff who sign hazardous waste manifest for example: <ul style="list-style-type: none"> <li>• Loading and unloading dock employees</li> <li>• Pick line employees</li> <li>• Drivers</li> <li>• Distribution Center and Transportation Managers</li> </ul>	Yes

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			<ul style="list-style-type: none"> <li>• Store staff who prepare return-to-vendor/DC shipments</li> </ul> <p>Distribution Center employees who:</p> <ul style="list-style-type: none"> <li>• Load, unload, or handle hazardous materials;</li> <li>• Inspects, marks, maintains, fabricates, reconditions, repairs, or tests a package, container or packaging component that is marked, certified, or used in transporting hazardous material in commerce.</li> <li>• Prepares hazardous materials for transportation including packaging;</li> <li>• Is responsible for safety of transporting hazardous materials;</li> <li>• Operates a vehicle used to transport hazardous materials.</li> </ul>	
<i>Hazardous Materials Transportation</i>	Overview of DOT Hazardous Materials Regulations (HMR)	Hazardous Materials Transportation regulations that apply to typical retail products, includes an introduction to exceptions for retail such as limited quantity and de minimis quantity. Also covers lithium battery shipping requirements.	Retail staff responsible for the design or implementation of an environmental compliance program.	No
<i>Air</i>	Air Quality Management for Retail	Overview of air quality (air emissions) laws and regulations that affect retail and support facilities (e.g., transportation & logistics facilities, data centers and corporate headquarters) that generate, or have the potential to generate, air emissions or may otherwise be subject to regulation under air quality rules. A brief summary of the assets that generate air emissions, a summary of key regulations, and a discussion on the criteria generally used by states to determine if an air permit is required.	Retail staff responsible for the design or implementation of an environmental compliance program.	No

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<i>Air</i>	Refrigerant Management for Retail	An overview of EPA regulatory requirements and technical information necessary to effectively manage environmental concerns related to refrigerant management and ozone protection issues. Includes developing policies and procedures for employees and contractors; proper documentation and tracking of refrigerants and developing Refrigerant Compliance Plans specific to organizational needs.	Retail staff responsible for the design or implementation of an environmental compliance program.  Retail staff in Energy Management, Engineering and/or Facilities Maintenance who have responsibility for programs for maintaining and operating HVAC and refrigeration equipment.	No
	EPA Refrigerant Training & Certification	EPA regulatory requirements and technical information necessary to effectively manage refrigerants during the maintenance of air conditioning and refrigeration equipment. Technicians are required to pass an EPA-approved test given by an EPA-approved certifying organization to become certified under the mandatory program.	Employees who maintain air conditioning and refrigeration equipment and/or other appliances using refrigerant and those employees who have refrigerant removal, disposal and management compliance responsibilities.  While most retailers use outside service providers for equipment maintenance, some retailers may use internal staff, especially at DCs.	Yes
<i>Waste</i>	Managing and Reducing Waste in Retail	Waste and recycling management regulations (including common state and local regulations and reporting requirements), waste reduction principles. Reducing the amount and/or toxicity of waste requiring disposal, including waste prevention, recycling, composting, and the purchase and manufacture of goods that have recycled content or produce less waste.	Retail staff responsible for the design or implementation of an environmental compliance program.  Retail staff responsible for managing waste and recycling service providers.	No
<i>Hazard Communication</i>	Hazard Communication Training (HazComm)	Covers chemical safety in the workplace. It includes where and how to access information about the identities and hazards of chemicals (Safety Data Sheets (SDS)) and how to handle hazardous chemicals appropriately.	All employees potentially exposed to hazardous chemicals must be informed and trained before going on the job. Because hazardous are common in consumer products, all facility staff should receive HazComm Training.	Yes

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<i>Flammable and Combustible Liquids Storage Tanks</i>	Aboveground Storage Tank (AST) Management	<p>An overview of environmental and fire code regulations on installing, managing and decommissioning aboveground storage tanks, including:</p> <ul style="list-style-type: none"> <li>• AST requirements and industry standards</li> <li>• Common installation requirements</li> <li>• SPCC tank requirements</li> <li>• Monitoring and leak detection</li> <li>• Inventory reconciliation</li> <li>• Inspection and maintenance</li> <li>• Closure and investigation</li> </ul>	Retail staff responsible for purchasing, installing, or managing underground and aboveground storage tanks, including facilities management, construction and remodel designers, procurement, fuel managers, and corporate EHS compliance	No
	Underground Storage Tank (UST) Management	<p>An overview of environmental and fire code regulations on installing, managing and decommissioning underground storage tanks, including:</p> <ul style="list-style-type: none"> <li>• UST regulations, requirements and industry standards</li> <li>• Common installation requirements</li> <li>• SPCC tank requirements</li> <li>• Training requirements</li> <li>• Monitoring and leak detection</li> <li>• Inventory reconciliation</li> <li>• Inspection and maintenance</li> <li>• Closure and investigation</li> </ul>	Retail staff responsible for purchasing, installing, or managing underground and aboveground storage tanks, including facilities management, construction and remodel designers, procurement, fuel managers, and corporate EHS compliance	No
	UST Operator	<p>Designated UST operators must be trained according to individual state requirements.</p> <p>Training for Class A operators should allow the operator to make informed decisions regarding compliance with regulatory requirements.</p>	Class A Operators: Retail Staff who have primary responsibility to operate and maintain the UST system and manage resources and personnel to achieve and maintain compliance.	Yes

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		<p>Training for Class B operators should provide an in-depth understanding of operation and maintenance aspects of UST systems.</p> <p>Training should allow the Class C operator to take appropriate action in response to UST related emergencies or alarms caused by spills or releases from an UST system.</p>	<p>Class B Operators: Retail Staff who have daily responsibility for on-site operation and maintenance of UST systems.</p> <p>Class C Operators: Daily on-site retail employees who are the first line of response to events indicating emergency conditions.</p>	
<i>Spill Prevention</i>	Facility-specific Training on Spill Prevention, Control & Countermeasure (SPCC) Plan	<p>Initial and annual training for oil handling personnel on:</p> <ul style="list-style-type: none"> <li>• Contents of facility’s SPCC Plan</li> <li>• Spill prevention and control</li> <li>• Discharge prevention equipment &amp; operation</li> <li>• Spill countermeasures</li> <li>• Spill reporting</li> <li>• Inspections and recordkeeping</li> <li>• General facility operations</li> <li>• Pollution control laws and rules</li> </ul>	<p>All oil-handling personnel must receive at least annual training to respond properly to spills in their work areas.</p> <p>Typically fuel managers and facilities maintenance staff at DCs, corporate campuses and data centers.</p>	Yes
<i>Environmental Chemistry and Toxicology</i>	Environmental Chemistry for Non-Scientists	<p>A review of fundamental chemical concepts which underlay an understanding of applied environmental chemistry.</p> <ul style="list-style-type: none"> <li>• Safety Data Sheets (SDS)</li> <li>• Chemical compatibility/reactivity</li> <li>• Organic compounds</li> <li>• Metals</li> <li>• Sampling and analysis</li> <li>• Chemical reactions</li> <li>• Waste treatment</li> <li>• Chemical measurements (metric units, PPM, PPB)</li> </ul>	Retail staff responsible for the design or implementation of an environmental compliance program.	No
	Environmental Toxicology for Non-Scientists	A review of fundamental toxicology, the study of the harmful or toxic properties of substances.	Retail staff responsible for the design or implementation of an environmental compliance program.	No

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<i>Emergency Planning and Community Right-to-Know Act (EPCRA) Wastewater</i>	EPCRA Planning and Reporting	EPCRA applicability and reporting requirements, including multiple chemical lists, applicability thresholds, required reporting, deadlines, available reporting tools, and mandatory documentation. Covers practical applications of the requirements for the retail industry.	Retail staff responsible for the design or implementation of an environmental compliance program.	No
	Wastewater Compliance for Food Preparation Operations	Wastewater discharges from stores with delis, restaurants, or meat cutting frequently require pretreatment for reduction of fats, oils, and greases (FOG) before discharge into the public sewer. An overview of typical regulations, pretreatment technologies, maintenance and reporting requirements.	Retail staff responsible for the design or implementation of an environmental compliance program.  Retail staff responsible for purchasing, installing, or managing facility plumbing systems and equipment, including facilities management, construction and remodel designers, and procurement	No
	Wastewater Compliance for Automotive Service Centers	Wastewater discharges from stores with automotive service centers frequently require pretreatment for reduction of petroleum, oils and sediments before discharge into the public sewer. An overview of typical regulations, pretreatment technologies, maintenance and reporting requirements.	Retail staff responsible for the design or implementation of an environmental compliance program.  Retail staff responsible for purchasing, installing, or managing facility plumbing systems and equipment, including facilities management, construction and remodel designers, and procurement	No

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<i>Stormwater</i>	Stormwater Management for Retail	<p>Regulations and management of stormwater at retail and logistics facilities including the National Pollutant Discharge Elimination System (NPDES) permits. Construction activities and programs and distribution centers under NPDES s regulations. Stores are regulated under local ordinances required by the EPA under Municipal Separate Storm Sewer System (MS4) regulations. Training covers:</p> <ul style="list-style-type: none"> <li>• Stormwater pollution prevention regulations</li> <li>• Stormwater discharge permits and No Exposure Certifications</li> <li>• Stormwater pollution prevention plans - required elements and implementation</li> <li>• Best management practices</li> <li>• Common problems and effective compliance strategies for retail</li> </ul>	<p>Retail staff responsible for managing stormwater permitting or developing and implementing a stormwater pollution prevention (SWPP) plan.</p> <p>Retail staff responsible for the design or implementation of an environmental compliance program.</p>	No
<i>Environmental Management Systems</i>	Introduction to Environmental Management Systems	An overview of environmental management systems (EMS) and how EMS can support environmental improvements and compliance in retail operations and facilities.	Retail staff responsible for the design or implementation of an environmental compliance program.	No
<i>Product Compliance</i>	Overview of Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) for Retailers	An overview of the federal laws, regulations and compliance requirements under FIFRA that apply to retail. This includes labeling and product advertising & description aspects of the major regulatory requirements, best practices, integrated pesticide management programs, registration requirements, compliance and enforcement.	<p>Retail staff responsible for the design or implementation of an environmental compliance program.</p> <p>Private label / brands managers.</p> <p>On-line marketing / e-commerce managers.</p>	No
<i>Product Compliance</i>	Overview of Toxic Substances Control Act (TSCA) for Retailers	Businesses that manufacture, import, process, distribute, or dispose of a regulated chemical substance or chemical mixture must comply with TSCA. Covers management rules for handling, storing, processing, and producing chemical substances, the TSCA chemical reporting system, what chemicals are regulated, and reporting and recordkeeping requirements.	<p>Retail staff responsible for the design or implementation of an environmental compliance program.</p> <p>Private label / brands managers.</p>	No