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Hazardous Waste Personnel Training

Reasons to train:

- Required for all LQG's.
- A good way for an SQG to meet their requirements (see next page).
- Helps to prevent violations and fines.
- Necessary to fully understand regulations.
- A good idea for a CESQG/VSQG.
- A good way to learn about Universal Waste, Used Oil, recycling, and more!
- Get answers to questions.

Still have questions?



You can find more information on my website. Or, don't hesitate to **contact me** if you still have questions about

hazardous waste or the training requirements of the US EPA and your State.

Training for the Safe Management of Hazardous Waste—IT'S THE LAW!

Subtitle C of the Federal Resource Conservation and Recovery Act (RCRA) and the applicable regulations of the US Environmental Protection Agency at 40 CFR 262.34 & §265.16 require you to train certain facility personnel who handle hazardous waste or may respond to an onsite release of hazardous waste.

The purpose of training is to provide awareness of the regulations and emergency response procedures applicable to your hazardous waste.



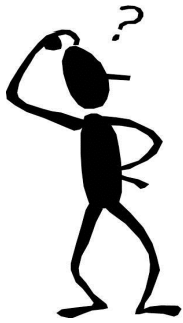
The type of training required depends upon the amount of hazardous waste you generate.

In addition to Federal regulations, your State will have its own training requirements.

What is Hazardous Waste Personnel Training?

- Introduction to USEPA/State & RCRA.
- Types of waste (Hazardous & Non-Hazardous).
- Onsite management of waste.
- Emergency preparation & prevention.
- Offsite transportation of waste.
- Safe work practices.





How do I Determine my Hazardous Waste Generator Status?

Generator status is defined at various locations in 40 CFR 261.5 and §262.34, it is determined by the amount, and to a degree the type, of hazardous waste generated and/or accumulated.

- A Large Quantity Generator (LQG) generates $\geq 1,000$ kg of hazardous waste **or** > 1 kg of acute hazardous waste **or** > 100 kg of acute hazardous waste spill residue, soil, or cleanup debris in a calendar month.
- A Small Quantity Generator (SQG) generates > 100 kg **but** $< 1,000$ kg of hazardous waste in a calendar month.
 - ⇒ An SQG who **accumulates** $> 6,000$ kg of hazardous waste is a storage facility.
- A Conditionally Exempt Small Quantity Generator (CESQG) generates ≤ 100 kg **and** ≤ 1 kg of acute hazardous waste **and** ≤ 100 kg of acute hazardous waste spill residue, soil, or cleanup debris in a calendar month.
 - ⇒ Some states refer to the CESQG as a VSQG: Very Small Quantity Generator.
 - ⇒ A CESQG who accumulates $> 1,000$ kg of hazardous waste is a SQG.

**Failure to train
Hazardous
Waste
Personnel is a
leading cause of
RCRA
regulatory
violations.**

Hazardous Waste Training for an LQG

The regulations at 40 CFR 262.34(a)(4) refer an LQG to §265.16—Personnel Training. This section requires you to train all facility personnel to do their job in compliance with the regulations. It must include site-specific information relevant to their position (such as how to implement the contingency plan). At a minimum training must familiarize employees with emergency procedures, emergency equipment, and emergency systems. In addition, training must be:

- Provided within 6 months of employment or new job position.
- Updated annually.
- Classroom or on-the-job.
- Documented as prescribed.
- Directed by a person who is trained and knowledgeable.

Hazardous Waste Training for an SQG

40 CFR 262.34(d)(5)(iii) requires an SQG to **ensure** that all facility personnel are **thoroughly familiar** with proper waste handling and emergency procedures relevant to their job responsibilities. This regulation is part of an SQG's responsibility to provide for adequate emergency preparation and response, sometimes known as the "Basic Plan".

Therefore you must ensure all of your employees know how to work with and/or around hazardous waste in a safe manner that complies with the regulations. You must also ensure they are aware of the correct emergency response procedures if there is a spill or release of hazardous waste. The regulations do not require a specific method – such as training – to achieve this 'thorough familiarity', but it is a good idea.

