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### US EPA identifies three statuses of hazardous waste generator:

- Large Quantity Generator (LQG)
- Small Quantity Generator (SQG)
- Conditionally Exempt Small Quantity Generator (CESQG)

### Ready for some more questions?

I have even more questions for your HazMat Employee training provider! Be sure to check out: [11 Questions to ask your HazMat Employee training provider.](#)

### Still have questions?



You can find more information on my website. Or, don't hesitate to

**contact me** if you have any questions about the generation, management, or disposal of hazardous waste.

# 9 Questions to ask your RCRA training provider

## Why 9 Questions?

I hope you use my services to provide **RCRA Training** for your **Hazardous Waste Personnel**. However, there are a lot of other training providers out there and perhaps you're considering one of them. If so, **I encourage you to ask them the following questions.** Their response, as compared to mine, will help you to decide who to go with.

You may have more questions, but these are the ones that have come to me after my 20+ years of regulatory experience.

Please feel free to contact me about my questions or any of your own you may have about the generation, management, and disposal of hazardous waste.



## 1. What are the regulations that require this training?

The answer is more complicated than it need be. If you are a Large Quantity Generator (LQG) of hazardous waste, one of your requirements is to comply with 40 CFR 262.34(a)(4) which references the training requirements in §265.16 for "Facility Personnel" of a TSDF. The

regulations in Part 265 were not intended for a generator of hazardous waste, however, the direct reference to them in 262.34(a)(4) makes it clear that this training requirement applies to an LQG as well as a Treatment Storage and Disposal Facility.





Packaging hazardous waste in a lab pack for off-site transportation and disposal.

## 2. Who are my “Facility Personnel” that I must train?

Personnel or Facility Personnel are defined at 40 CFR 260.10 as “all persons who work at, or oversee the operations of, a hazardous waste facility, and whose actions or failure to act may result in noncompliance with the requirements of part 264 or 265 of this chapter.” While it may seem that this definition applies to persons at a TSD, the regulatory reference in #1 above links it to

persons at an LQG. These persons are commonly referred to as: **RCRA Personnel** or **Hazardous Waste Personnel**. Take note that this definition applies not only to your employees, but may also apply to contractors who work at your site.

**“Personnel must be trained within 6 months of new hire or job responsibility.”**

## 3. How frequently must I provide training?

40 CFR 265.16(b) mandates training to be provided within 6 months of new employment or new job assignment in a facility. In that six months untrained facility personnel must be directly supervised by facility personnel who have received training and are knowledgeable of the requirements for safe management of hazardous

waste. All facility personnel must receive an **annual review** of their initial training.



## 4. Is your training certified or approved by the US EPA or by a State environmental agency?

Neither the US EPA, nor any State with an authorized hazardous waste program, certify training providers or approve their training programs for use.

The responsibility is yours as the employer to select your training provider.



## 5. When was the last time you (the training provider) received RCRA Training?

40 CFR 265.16(a)(2) requires the training program to be directed by a person who has received **annual** training. Your prospective RCRA Training provider should be able to demonstrate they have attended—at a minimum—an annual review of their initial training.



## 6. Do the training requirements apply to facility personnel who work only at a Satellite Accumulation Area (SAA) for hazardous waste?

The regulations for satellite accumulation of hazardous waste at 40 CFR 262.34(c), do not reference the facility personnel training requirements of §265.16. Therefore, you are **not required to train** facility personnel whose sole contact with hazardous

waste is while it is in a satellite accumulation area.

However, it remains a hazardous waste, despite its location. For that reason I include training of facility personnel exposed to hazardous waste in an SAA.

*“You are not required to provide RCRA training to personnel whose sole exposure to hazardous waste is at an SAA”*

## 7. Do the training requirements apply to facility personnel who work only with Used Oil and/or Universal Waste?

**Universal Waste** and **Used Oil** are exempted by regulation (§273 & §279 respectively) from management as hazardous waste and are **not subject to the training requirements** for facility personnel.

The universal waste regula-

tions, however, while not specifically calling for training, do require some information to be provided to employees who work with or around universal waste for the purposes of worker protection and spill response. I always include information about universal

waste and used oil in my RCRA Training.

UNIVERSAL WASTE	
SHIPPER	_____
ADDRESS	_____
CITY, STATE, ZIP	_____
CONTENTS	_____
ACCUMULATION START DATE	_____

USED OIL	
GENERATOR INFORMATION	
COMPANY	_____
ADDRESS	_____
CITY, STATE, ZIP	_____
DATE	_____
NAME	_____
USED OIL	

## 8. What training is required for a Small Quantity Generator (SQG) of hazardous waste?

As we saw in #1, the training requirement in 40 CFR 265.16 as referenced in §262.34(a)(4) applies solely to a Large Quantity Generator (LQG) of hazardous waste. So, while there is no regulatory requirement for SQG's to train their facility personnel, §262.34(d) (iii) reads, "*The generator must ensure that all employees are thoroughly familiar*

*with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.*" **It does not state** that formal training is required. Instead the regulations leave it up to the SQG to determine how to make their employees "thoroughly familiar" with the applicable regulations and procedures.

For this reason I recommend training of facility personnel of an SQG.



## 9. Are you a lawyer?

I have nothing against lawyers, in some situations their services are invaluable. However, they don't always make the best trainers because their experience has been interpreting the regulations and their legal justification instead of what you must do to com-

ply with them. In contrast, my professional experience in the EH&S field has been 'on the shop floor': driving a truck, handling hazardous waste, completing weekly inspections, cooperating with agency inspections, preparing shipping papers, and more of the like. I feel

my job as your trainer is to reveal the regulations and teach you methods of compliance I have learned over the years, not the Genesis of the regulations. **At my training you'll learn how to do your job and comply with the regulations, not why you have to do it.**

**"I have nothing against lawyers, but..."**

## Any more questions?

Two questions remain, perhaps *the* questions:

1. How much does your training cost?
2. How far will I and my employees have to travel?

My training is the best value you will

find! Register for as low as \$299 for the first person and \$259/person for additional coworkers at my Public Training Seminars. Training is available nationwide and year round, so there is a good chance I will be

coming to your area soon. If you don't find a convenient date or location, consider **Osite Training** or register for my regularly scheduled Web-Based Training.

