

RCRA HAZARDOUS WASTE MANAGEMENT TRAINING

Who must Receive Hazardous Waste Training?

Under the Resource Conservation and Recovery Act (RCRA) regulations small quantity generators (SQG) and large quantity generators (LQG) of hazardous wastes are required to provide personnel with initial training within 6 months of employment or assignment to a new position with hazardous waste management tasks **and** annual training there after.

A SQG generates between 100 kilograms (220 lbs.) and 1,000 kilograms (2,200 lbs.) of non-acute hazardous waste and no more than 1-kilogram (2.2 lbs.) of acute hazardous waste per calendar month. A SQG can store hazardous waste for 180 days or less but the storage amount cannot exceed 6,000 kilograms (13,200 lbs.).

A LQG generates 1,000 kilograms (2,200 lbs.) or more of non-acute hazardous waste or more than 1 kilogram (2.2 lbs.) of acute hazardous waste per calendar month. A LQG can store hazardous waste for 90 days or less. For a LQG, all “facility personnel” are required to receive this training. Facility personnel are defined under 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”. Although this definition is vague, EPA has indicated in various guidance documents and memos, individuals who perform one or more of at least the following hazardous waste functions are required to receive hazardous waste training:

- Label hazardous waste containers;
- Move hazardous waste containers;
- Perform inspections;
- Perform the functions of an emergency coordinator; and
- Prepare, review, or sign hazardous waste manifests.

A SQG 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**”. To clarify who is required to receive hazardous waste training, EPA indicated in a regulatory preamble “employees who handle hazardous waste as part of their normal job responsibilities or are likely to handle wastes in an emergency situation must be thoroughly familiar with proper waste handling and emergency procedures”. In general, personnel who perform the functions listed above for LQGs and SQGs are required to receive hazardous waste training.

Hazardous Waste Management Training Course Content

This 4-hour training course is designed to provide TICUA specifically with a greater understanding of how the complex hazardous waste regulations apply to colleges and universities. During the training course our expert instructor will use pictures, examples, case studies and their extensive experience to explain the history and aspects of the hazardous waste regulations and make them easier to understand. Our training manual will help the attendee apply what they have learned after the training program is over and be a valuable desktop reference.

Topics to be introduced and discussed during the 4-hour session include:

- Why RCRA was passed;
- When is a waste considered hazardous;
- What are Listed and Characteristic Hazardous Wastes;
- What are State Listed Hazardous Wastes;
- “Mixture Rule” and “Derived-From Rule”;
- How to perform a Hazardous Waste Determination;
- Wastes exempt from Hazardous Waste Regulations;
- Empty Container rule;
- Categories of Hazardous Waste Generators;
- How to determine your Generator Status (CESQG, SQG or LQG);
- EPA’s “Counting Rule”;
- What are the rules for Satellite Accumulation Areas;
- What are the rules for 90 or 180 day Storage Areas;
- List of Incompatible Materials and Potential Consequences;
- Procedures for Inspection and frequency thereof;
- Hazardous Waste Manifesting and Proposed Rules;
- Land Disposal Restrictions paperwork requirements;
- Contingency Plan requirements for SQGs and LQGs;
- Responsibilities of the Emergency Coordinator;
- RCRA Reporting and Record Keeping requirements;
- Used Oil requirements for Generators;
- Universal Wastes and how must they be managed;
- How Contaminated Rags/Wipes and Aerosol cans are regulated;
- Closure requirements for 90 or 180 day Storage Areas;
- Other key hazardous waste requirements; and
- Proposed Hazardous Waste Rule for College & University Laboratories

Course Materials

Each attendee will receive a copy of the Hazardous Waste Management Training Manual in a three ring binder prepared for TICUA members, current excerpts from the EPA hazardous waste regulations (40 CFR parts 260 – 270) and state of Tennessee Hazardous Waste regulations, as well as important fact sheets.