

Hazardous Waste Generator Training Requirements



**ENVIRONMENTAL
QUALITY**

WASTE MANAGEMENT & RADIATION CONTROL

Overview

- Training for Manifest Signers
- Small Quantity Generator Training
- Large Quantity Generator Training
 - Training Plans: Who must be trained and on what?
- Universal Waste Handler Training



Training for Manifest Signers

49 CFR 172.704

- Hazardous Waste Shipping is Jointly Regulated
- If you are signing a hazardous waste manifest you are offering hazardous materials for transportation
- When you sign you are **CERTIFYING**
- **49 CFR 172.704**
 - General Awareness
 - Function-Specific Training
 - Safety Training
- See RCRA Online#14687 for reference



**WASTE MANAGEMENT
& RADIATION CONTROL**

SQG Training

R315-262-16(b)(9)(iii)

*The small quantity generator shall ensure that all employees are thoroughly familiar with **proper waste handling and emergency procedures**, relevant to their responsibilities during normal facility operations and emergencies.*



**WASTE MANAGEMENT
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LQG Training

R315-262-17(a)(7)

Facility Personnel Must Successfully Complete Training

- Within 6 months and annual refresher
- Relevant Hazardous Waste Management Procedures
- Response to Emergencies - HAZWOPER Can be Used

Rules Explicitly Allow Computer-Based Training



LQG Training Plan

R315-262-17(a)(7)

Documentation and Records

- Job Title and Name
- Job Description
- Type and Amount of Introductory and Continuing Training
- Record of Training for Each Employee
 - Current
 - Former



| Job Title / Environmental Responsibilities | General Awareness | Job Specific RCRA | Job Specific Other" | Emergency Response | Employee |
|---|-----------------------------------|---|-------------------------------|---|-----------------|
| ENVIRONMENTAL MANAGER Primary HW emergency coordinator; sampling and characterizing wastes; hazardous waste handling and cleanup; prepare drums and shipping papers and manifests for shipment; recordkeeping; training. | New Hire RCRA; Annual Onsite RCRA | Initial 40 hr RCRA | | Annual Emergency Contingency Plan (ECP) Training | |
| ENVIRONMENTAL ENGINEER Alternate HW emergency coordinator; sampling and characterizing wastes; hazardous waste handling and cleanup; prepare drums and shipping papers and manifests for shipment; recordkeeping; training. | New Hire RCRA; Annual Onsite RCRA | Initial 40 hr RCRA | Full DOT HAZMAT-every 3 years | Annual ECP Training; HAZWOPER w/Annual refresher | |
| OPERATORS Hazardous waste handling and cleanup; prepare hazardous waste for shipment; prepare shipping papers and manifests for shipment; recordkeeping. | New Hire RCRA; Annual Onsite RCRA | Annual (job-specific) training | Full DOT HAZMAT-every 3 years | Annual ECP Training; HAZWOPER or RCRA training w/Annual refresher | |
| WATER TREATMENT OPERATORS Emergency Response | New Hire RCRA; Annual Onsite RCRA | | DOT- Warehouse-every 3 years | Annual ECP Training; HAZWOPER w/Annual refresher | |
| ENVIRONMENTAL SPECIALIST Sampling and characterizing wastes; hazardous waste handling and cleanup; prepare drums and shipping papers and manifests for shipment; recordkeeping; training. | New Hire RCRA; Annual Onsite RCRA | Initial 40 hr RCRA Annual RCRA Refresher | Full DOT HAZMAT-every 3 years | Annual ECP Training; HAZWOPER w/Annual refresher | |
| ENVIRONMENTAL Technician Prepare shipping papers and manifests for shipment; recordkeeping; training. | New Hire RCRA; Annual Onsite RCRA | | Full DOT HAZMAT-every 3 years | Annual ECP Training; HAZWOPER w/Annual refresher | |

Universal Waste Training

R315-273-16

A small quantity handler of universal waste shall inform all employees who handle or have responsibility for managing universal waste.

The information shall describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.



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Frequent Training Violations

- Manifest signers not trained (SQGs and LQGs)
- Training not documented (SQGs)
- No Job descriptions or descriptions don't include hazardous waste duties
- Emergency coordinators and/or responders not included in training plan
- Contractors not included in training plan
- Type & amount of initial and continuing training not specified
- Annual refresher training not completed or not completed timely



Questions?

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