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