
Hazardous Waste Generator Training Requirements

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UTAH DEPARTMENT of
ENVIRONMENTAL QUALITY
**WASTE MANAGEMENT
& RADIATION CONTROL**

Overview

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



Training for Manifest Signers

- 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 §172.204)
- See RCRA Online#14687 for reference

Reference

DOT HazMat Shipping
Training

49 CFR 172.704

General Awareness

Function-Specific

Safety

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.



SQG Training Content

1. Site-specific emergency response training
2. RCRA Hazardous Waste training
3. DOT HazMat shipping training
 - general awareness,
 - function-specific, safety

LQG Training

R315-262-17(a)(7)

- Facility personnel must complete training within 6 months & annual refresher
- Must include hazardous waste management procedures
- Employees must be able respond to emergencies



Training Contractors

- Contractors working at LQG sites fall under the R315-260-10 definition of “facility personnel.”
- At a minimum, train contractors on: evacuation routes, emergency communications/alarms, and proper hazardous waste handling procedures.
- See RCRAOnline ([RO14180](#)) interpretation letter

LQG Training Content

R315-262-17(a)(7)(i)(B)
R315-262-17(a)(7)(i)(C)

Who directs
the training?

Hazardous
waste
management
procedures

Contingency
Plan
implementation

Response to
emergencies

Training Delivery



Train-The-Trainer

- Offsite or online commercial training
- Document!

On-The-Job

- Supervised
- Document content, schedule, and techniques

LQG Training Plan R315-262-17(a)(7)



Job Title and
Name



Job Description



Type and Amount
of Introductory
and Continuing
Training



Record of
Training for Each
Employee

Job Title / Environmental Responsibilities	General Awareness	Job Specific RCRA	Job Specific Other¹	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

- 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

1. Manifest signers not trained (SQGs and LQGs)
2. Training not documented (SQGs)
3. No job descriptions or descriptions don't include hazardous waste duties (LQGs)
4. Emergency coordinators and/or responders not included in training plan (LQGs)
5. Contractors not included in training plan (LQGs)
6. Type & amount of initial and continuing training not specified (LQGs)
7. Annual refresher training not completed or not completed in a timely manner (LQGs)



Questions?



Thank you



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<https://deq.utah.gov/division-waste-management-radiation-control>