



RCRA Hazardous Waste Personnel Training



DUE: ANNUALLY

For large quantity generators (LQGs)



40 CFR 262.17(a)(7)

For SQGs: 40 CFR 262.16(b)(9)(ii)

Who Needs Training?

The Resource Conservation and Recovery Act (RCRA) regulations mandate training for “hazardous waste personnel,” meaning anyone working at or involved in the operations at a hazardous waste facility *whose actions or failure to act could cause noncompliance*.

Training Includes:

Training must teach personnel to perform their job in a way that ensures compliance with the RCRA hazardous waste regulations. At LQG sites, training must prepare personnel for emergencies by covering applicable procedures, equipment, and systems.

SQG & VSQG Training

Small quantity generators (SQGs) must train personnel to be “thoroughly familiar” with their responsibilities for RCRA compliance. There is no timeframe for re-training SQG personnel under RCRA; training should be frequent enough that employees remain “*thoroughly familiar...*”

For very small quantity generators (VSQGs), training personnel is strongly encouraged to prevent RCRA violations, though there is no formal training mandate under Federal rules.

Important! Your State’s regulations may require more than the Federal RCRA rules described here.

When and How Often to Train



US EPA requires training...

Within 6 months

of hire or job assignment.

Employees must work under direct supervision until they are trained.



Refresher training is required...

Annually

for personnel at large quantity generator (LQG) facilities.



Records of Training

Records of training for current personnel must be kept **until the facility’s closure**. Generators must keep training records on former personnel **for at least 3 years** after the employee departs.

LQGs must also maintain the following documents:

- A **job title and job description** for each hazardous waste-related position on site
- The **name of the employee** in each position
- A **written description of the training** provided
- Records that document training was **completed**

