

5 Steps to Effective RCRA Training



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This guide presents five actionable steps EH&S professionals at hazardous waste generator sites can take to evaluate how Federal/State hazardous waste requirements apply to their facility and ensure “facility personnel” receive training as required by the Resource Conservation and Recovery Act (RCRA) regulations.

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Why RCRA Training Matters

Providing effective training for personnel who work with, handle, and manage hazardous waste is fundamental to compliance with US EPA's Resource Conservation and Recovery Act (RCRA) regulations. Failure to provide appropriate RCRA training can result in violations that now carry penalties exceeding \$90,000 per day, per violation.

This guide highlights key hazardous waste training and recordkeeping rules to clarify what's required for generators under RCRA and provides tips to avoid common mistakes and prevent releases to the environment.



1. Know Your Generator Category

The RCRA training required for personnel at your site will vary based on the volume of hazardous waste your site generates. There are three size categories for hazardous waste generators under the Federal hazardous waste regulations.

Large Quantity Generators (LQGs)

Generate, in any calendar month:

- ≥ 1,000 kg of non-acute hazardous waste, or
- > 1 kg of *acute* hazardous waste, or
- > 100 kg of residue from the cleanup of *acute* hazardous waste

For LQG sites, the RCRA regulations require covered employees to be trained within 6 months of their hire date or job assignment. Annual refresher training is required thereafter.

Small Quantity Generators (SQGs)

Generate, in any calendar month:

- > 100 kg but < 1,000 kg of non-acute hazardous waste, and
- ≤ 1 kg of *acute* hazardous waste

SQG personnel must be trained to be “thoroughly familiar” with relevant waste management requirements.

Very Small Quantity Generators (VSQGs)

Generate, in any calendar month:

- ≤ 100 kg of non-acute hazardous waste, and
- ≤ 1 kg of *acute* hazardous waste

Tips for Compliance

The RCRA regulations require every generator to determine their generator category—LQG, SQG, or VSQG—on a monthly basis. Knowing your site’s generator category is crucially important. Beyond the training requirements for personnel, your generator category determines things like how much hazardous waste you may accumulate on site, the time limits for on-site storage, responsibilities for RCRA reporting and preparing for emergencies, and more.

Keep in mind that not every state utilizes the Federal RCRA generator categories. Some states have established their own categories for generators, and these rules can be more restrictive and/or more burdensome than Federal EPA standards. Lion Members can access state-specific resources in the **Member Area** of Lion.com.



2. Identify All “Hazardous Waste Personnel”

The RCRA regulations require training for hazardous waste facility personnel. These personnel perform essential job roles on site that must be done “by the book”—that is, according to the RCRA regulations.

From machine operators, waste handlers, and maintenance technicians to supervisors and EH&S managers, personnel covered by RCRA are involved in day-to-day operations at every level. To ensure all covered personnel receive appropriate training, the first step is to identify every full-time, part-time, or temporary employee who must be trained according to RCRA. That includes contracted workers acting on the site’s behalf.

Key Definition

Under RCRA, **facility personnel** means “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 RCRA regulations.

[40 CFR 260.10]

Hazardous waste personnel perform jobs including:

- Choosing hazardous waste containers.
- Marking or labeling containers.
- Handling or moving containers.
- Inspecting containers or hazardous waste areas.
- Operating a machine or process that generates waste.
- Identifying regulated hazardous waste.
- Tracking/scheduling waste storage per RCRA time limits.
- Determining generator category.



[Learn more about hazardous waste personnel training.](#)

Tips for Compliance

Think about your facility’s materials, processes, and waste streams to determine which job roles carry some level of responsibility for the way hazardous waste is managed, handled, moved, stored and prepared for transportation on site.

Performing any job in a way “that ensures compliance with RCRA” means preventing releases to the environment that threaten workers or the public, first and foremost, as well as properly characterizing, handling, and storing hazardous wastes to be eventually treated and disposed of.

Once all hazardous waste personnel are identified, you are ready to create a plan to provide training to the level required by RCRA for each covered employee.

3. Provide Adequate Initial RCRA Training

First-time, or “initial,” RCRA hazardous waste training must equip employees with the knowledge to perform their role in compliance with the regulations to prevent releases to the environment, injuries and illnesses, emergencies, costly civil penalties for violations, and long-term liability.

Key Regulation

“Facility personnel must successfully complete a program of classroom instruction, online training (e.g., computer-based or electronic), or on-the-job-training that teaches them to perform their duties in a way that ensures compliance with (the RCRA regulations).”

[40 CFR 262.17(a)(7)(i)(A)]



For large quantity generators, the RCRA regulations list several elements that must be included in training in order to “ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems....”

[40 CFR 262.17(a)(7)(i)(C)]

Tips for Compliance

You don’t get a second chance to make a first impression. That’s certainly true when it comes to an employee’s first experience with hazardous waste training. Employees who are new to your industry sector or inexperienced with hazardous chemicals may have little or no practice with navigating regulations at the level of detail needed to manage hazardous waste in line with US EPA RCRA standards.

RCRA training provided to each employee should be thoroughly vetted to ensure it is complete, accurate, and relevant to the employee’s responsibilities. At a minimum, employers must verify that information provided in training is up to date with current RCRA regulations and site procedures.

4. Consider Off-site Transportation

EPA's RCRA rules are not the only regulations that apply to hazardous wastes. Most wastes regulated under RCRA are considered hazardous materials by the US Department of Transportation (DOT) Hazardous Materials Regulations, or HMR, and must be prepared in compliance with those requirements, including specific rules for wastes.

Key Definition

The HMR defines **hazardous waste** to mean “any material that is subject to the Hazardous Waste Manifest Requirements of the US Environmental Protection Agency specified in 40 CFR part 262.”

[49 CFR 171.8]

In other words, any hazardous waste that requires the use of the Manifest under RCRA is also regulated as a hazardous material under the HMR. US DOT requires training for all “hazmat employees,” including employees who prepare shipping papers, and requires re-training at least once every 3 years. [Learn more about DOT hazmat employee training.](#)

Tips for Compliance

Make it a priority to “cross-train” personnel on both the RCRA requirements applicable to their job and on the US DOT’s regulations for transportation. This approach provides for more flexibility to assign employees to the job roles, shifts, and tasks that need to be done on any given day. Managers can feel confident that employees have the training and regulatory knowledge to perform key jobs in compliance with applicable regulations.



5. Keep Accurate and Complete Training Records

If you don't document your employees' training, it's like it never happened. Large quantity generators (LQGs) are required to keep physical or electronic copies of training records for current personnel until closure of the facility and must maintain a record of each employee's training for three years after the employee leaves the facility.

[40 CFR 262.17(a)(7)(iv) and (v)]

Key Regulation

Training records must include:

- Employee's name.
- Employee's job title.
- Employee's job description.
- Written description of the amount and type of training the employee received.
- A record or document that proves the training has been given to and completed by the employee.



SQGs and VSQGs: While there are no explicit requirements for small or very small quantity generators to keep records of training under RCRA, best management practices would suggest that any training provided to employees should be documented. At a minimum, employers should keep a record of who received what training and when. These records will inform future update training and re-training efforts.

Tips for Compliance

Create a template for all RCRA training records with fields for each required piece of information listed above. This will ensure that training records are complete and consistent. Keep this completed form and any certificate or proof of training provided by a trainer.

With respect to **record retention**, keep records of training available on site for as long as practicable in a form that is quickly and easily retrievable for inspection. These records demonstrate past compliance with the RCRA regulations and could be useful in demonstrating ongoing commitment to providing training in line with the Federal requirements.

Key Points to Remember

Compliance with US EPA's RCRA regulations is a crucial part of protecting yourself, your team, the environment, and your organization's bottom line.

Providing adequate RCRA hazardous waste management training is fundamental to RCRA compliance. Here's a quick recap of essential takeaways:

- Large quantity generator (LQG) personnel must receive initial and annual refresher training. Small quantity generator (SQG) personnel must be trained to be "thoroughly familiar" with the requirements.
- Training assigned to employees should be thoroughly vetted to ensure it is complete, accurate, and relevant to the employee's responsibilities.
- LQGs must maintain a record of each employee's training for three years after the employee leaves the facility.





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