

Obtaining and Maintaining Your RCRA Training

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- Where Do These Damn Rules Come From Anyway?

The Good



The Bad



The Badder



The More Badder



The Even More Badder Than You Thought Possible



The Ugly



The More Ugly



The Way More Ugly



The Still Even Way More Uglier Yet



Where do these Damn Rules Come From Anyway?

- ◉ Legislation Resulting from Crisis or Need
- ◉ Regulating Agencies Empowered to Develop Specific Regulations
- ◉ Regulations interpreted by Enforcement
- ◉ Court Interpretations / Ruleings
- ◉ Street Level Regulation

Why Good Training?

- Prevents Accidents
- Saves Lives and Limbs
- Prevents Lawsuits
- Lowers Costs
- Prevents Violations and Penalties
- Avoid Bad Press
- Stay Out of Jail

The Good



How Much Training?

- Training Regulations Not Detail Specific
- Training Must be Site Specific
- Factors: Specific Hazardous Properties, Volume of Waste, Type of Facility, Type and Location of Equipment, Experience of Workers.

The Regs

- ◉ What do the RCRA Training Requirements Actually Say?
- ◉ Large Quantity Generators

40 CFR 265.16(a)

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures facility's compliance with the requirements of this part.

What does this mean?

EPA Training Interpretations

**Memo, Springer to Sherman;
November 19, 2003; RCRA Online
#14687)**

**Memo, Cotsworth to Tierney; June 10,
1997 (RCRA Online #14286)**

**Memo, Denit to Bell; October 7, 1993
(RCRA Online #11779)**

40 CFR 265.16(a)(2)

Employees must be instructed by a person who is trained in hazardous waste management procedures.

Does NJDEP evaluate adequate competence of the trainer? If so, how?

Trainer Evaluation

- ❑ **What experience has the trainer had with the site operations or similar site operations?**
- ❑ **What RCRA training has the trainer had?**
- ❑ **How well do the employees know what to do for routine handling of hazardous wastes and emergency response?**

40 CFR 265.16(a)(3)

The training program must be designed to ensure that facility personnel are able to respond effectively to emergencies using sound hazardous waste management procedures.

Does NJDEP evaluate the training program? If so, how?

Training Program Evaluation

- Will the employee learn where to quickly find the contact information for the Emergency Coordinators, private and community response services?**
- Are there details for how to handle, containerize, label, store, inspect and document hazardous waste management as well as how to respond to a spill of hazardous waste?**

Training Program Evaluation (continued)

- Is there a mechanism to test the employee's understanding of the information presented?**
- Is an outline of the scope and schedule for continual training provided?**

40 CFR 265.16(b)

Document training within 6 months of hire.

Name & Title	Hire Date	RCRA Training Date	Training Program ID	Signature
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40 CFR 265.16(c)

Perform an annual review of training program

- Is the trainer current with their certifications?**
- Regulatory updates incorporated?**
- Changes to processes/procedures included?**

40 CFR 265.16(d)

Maintain Training Records at Facility.

Is it ok to keep the records at a different location than the facility being inspected?

40 CFR 265.16(e)

Training records must be kept until closure for current employees.

For former employees, training records must be kept for at least three years from the date the employee last worked at the facility.

SMALL QUANTITY GENERATORS



40 CFR 262.34(d)5iii

Must ensure that employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies.

How does NJDEP evaluate SQG's for this?

SQG Training Evaluation

**Do employees know where to find the
Emergency Coordinators, private
responders and community
response services contact information?**

SQG Training Evaluation (continued)

Do employees know the details for how to handle, containerize, label, store, inspect and document hazardous waste management as well as how to respond to a spill of hazardous waste?

CESQG Training

IT'S UP TO YOU!

Will you consider:

- Company's Liability ?**
- Personal Liability ?**
- Public Perception ?**

● Will You Be Ready
When.....

Mr. Inspector Shows Up



Mr. Inspector Shows Up



Mr. Inspector Shows Up



Mr. Inspector Shows Up

