Resource Conservation and Recovery Act (RCRA) Employee training requirements
- Hazardous Waste Management Procedures
- Emergency Response
- Hazard Communication

Training Outline
- Hazardous Waste Generator Status
- Waste Determination
- Container Management
- Accumulation Time and Storage Limits
- Labeling
- Recordkeeping

Determining Generator Status
- Conditionally Exempt Small Quantity Generators (CESQGs)
- Small Quantity Generators (SQGs)
- Large Quantity Generators (LQGs)

Basic Requirements for Small Quantity Generators
- Waste Determination
  1. Generator Knowledge
  2. Testing Representative Sample
- Hazardous Wastes Defined by EPA
  1. Characteristic
  2. Listed

Characteristic Wastes
- Ignitable
- Corrosive
- Reactive
- Toxic

Ignitable Waste
- Flash point of less than 140° Fahrenheit.
- Waste code “D001”

Corrosive Waste
- pH less than or equal to 2 or greater than or equal to 12.5
- Waste code “D002”

Reactive Waste
- Unstable under “normal” conditions
- Waste Code “D003”

Toxic Waste
- Harmful or fatal when ingested or absorbed
- Defined through TCLP testing
- Waste codes “D004” through “D043”

Listed Waste
- Harmful to Human Health and the Environment
- The lists include:
  1. Non-Specific Source Wastes (F-listed)
  2. Specific Source Wastes (K-listed)
  3. Discarded Commercial Chemical Products (P & U-listed)

Container Management
- Containers must be in good condition and compatible with the materials stored within
- Containers must remain closed at all times except to add or remove waste
- Weekly Inspections
- Do not mix incompatible wastes
- Containers of incompatible wastes should be separated
- Containers must be handled in a manner that prevents leaks

Weekly Inspection Log
- Signed and dated weekly
- Number of containers and general condition
- General observations and remedial actions
- Hazardous Waste label completion
- Maintain aisle space between containers

Proper Storage
- Do not overfill
- Maintain three inches of air space
- Spill response equipment on hand
- Keep containers closed

Accumulation Time and Storage Limits
- CESQGs: indefinitely if < 220 lbs/month or a total < 2200 lbs onsite.
- SQGs: 180 days if < 2200 lbs/month or a total < 6600 lbs onsite.
- 90-day extension

Labeling
- Generator Contact Info
- EPA ID Number
- Manifest Number
- Accumulation Start Date
- EPA Waste Numbers
- DOT Shipping Name

Recordkeeping and Reporting
- Generator and TSDF Manifest copies
- Land Disposal Restriction Form
- Keep all records in the Yellow Box
- Three year record retention