

<u>SUBJECT</u>		<u>DATE</u>
1394. RCRA Empty vs. DOT Empty	ENCORE	JUL 30, 2020
1395. RCRA Empty vs. DOT Empty II	ENCORE	AUG 6, 2020
1396. Empty Containers and the "Empty" Label	ENCORE	AUG 13, 2020
1397. Exceptions to Free Liquids in Landfills Prohibition	ENCORE	AUG 20, 2020
1398. Dust Suppression in Landfills with Nonhazardous Liquids	ENCORE	AUG 27, 2020
1399. Treated Hazardous Wastes Used as Dust Suppressant	ENCORE	SEP 3, 2020
1400. Regulatory Status of Used Oil Mixed with Diesel Fuel	ENCORE	SEP 10, 2020
1401. RCRA Liquids, Free Liquids, and Releasable Liquids	ENCORE	SEP 17, 2020
1402. Available Regulatory Relief from Underlying Hazardous Constituent (UHC) Requirements	ENCORE	SEP 24, 2020
1403. Smoke Detector Disposal and the NRC	ENCORE	OCT 1, 2020
1404. DOT Shipping of Damaged, Defective, or Recalled Lithium Batteries	ENCORE	OCT 8, 2020
1405. Conservative Declaration that Material is a Hazardous Waste	ENCORE	OCT 15, 2020
1406. Manifest Exception Report Submittal Timeframes – RCRA vs. TSCA	ENCORE	OCT 22, 2020
1407. Characteristic Ignitable, Corrosive or Reactive Debris and Macroencapsulation	ENCORE	OCT 29, 2020
1408. RCRA Satellite Accumulation Areas and Applicability of Personnel Training		NOV 5, 2020
1409. The Hazardous Waste Generator Improvements Rule and Designation of Nonhazardous Waste		NOV 12, 2020
1410. RCRA Aisle Space Requirements and Washington State vs., EPA		NOV 19, 2020
1411. The Definition of Good Housekeeping	ENCORE	NOV 24, 2020
1412. Absorbent Additions and Treatment	ENCORE	DEC 3, 2020
1413. LDR Notifications and F001-F005 Constituents of Concern	ENCORE	DEC 10, 2020
1414. LDR Notifications and F001-F005 Constituents of Concern – Again!	ENCORE	DEC 17, 2020
1415. 'Twas the Night before Christmas – The Twenty-Seventh Edition		DEC 24, 2020
1416. LDR Notifications and F001-F005 Constituents of Concern - One Last Time!	ENCORE	DEC 31, 2020
1417. RCRA Empty Containers and Removing as Much Waste as Possible	ENCORE	JAN 7, 2021
1418. Universal Waste, Incandescent Bulbs and Nonhazardous Bulbs	ENCORE	JAN 14, 2021
1419. Listed Waste Codes and Pre-RCRA Wastes	ENCORE	JAN 21, 2021
1420. Commercial Chemical Products and Unused Batteries	ENCORE	JAN 28, 2021
1421. Recycling of Non-Listed Commercial Chemical Products	ENCORE	FEB 4, 2021
1422. RCRA Personnel Training and Classroom Training vs. Online Training	ENCORE	FEB 11, 2021

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## TWO MINUTE TRAINING

**TO:** CENTRAL PLATEAU CLEANUP COMPANY

**FROM:** PAUL W. MARTIN, RCRA Subject Matter Expert  
CPCCo Environmental Protection, Hanford, WA

**SUBJECT:** RCRA PERSONNEL TRAINING AND CLASSROOM TRAINING VS. ONLINE TRAINING

**DATE:** FEBRUARY 11, 2021

<u>CPCCo Projects</u>	<u>CPCCo - Env. Protection</u>	<u>HMIS</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
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## TWO MINUTE TRAINING

**SUBJECT:** RCRA Personnel Training and Classroom Training vs. Online Training

**Q:** A customer is aware that the facility's hazardous waste workers must have classroom or on-the-job RCRA training in order to perform their duties in a way that ensures the facility's compliance with the hazardous waste management requirements. However, some of the facility's RCRA training is performed online rather than in a classroom. [WAC 173-303-330](#), Personnel training, [[40 CFR 264.16 /265.16](#)], states that the facility owner or operator must provide a program of classroom instruction or on-the-job training for facility personnel. If the facility's RCRA training is conducted online, e.g., computer-based training, is that training acceptable as RCRA training or must all RCRA training that is not on-the-job training be conducted in a classroom setting?

**A:** According to an EPA "[Frequent Questions](#)" topic, EPA stated:

*"May RCRA hazardous waste facility personnel training be completed online and does EPA provide online training?"*

*There is no specific format required for RCRA facility personnel training, as long as the training program meets the minimum requirements in 40 CFR §264/265.16 or the appropriate generator training requirements."*

Therefore, as long as the customer's RCRA online training meets the minimum requirements of WAC 173-303-330(1)(e), [40 CFR 264/265.16(a)(3)], the online training is an acceptable format as classroom training. The minimum training program requirements are that facility personnel must be able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems. The training program must include where applicable:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- Key parameters for automatic waste feed cut-off systems;
- Communications or alarm systems;
- Response to fires or explosions;
- Response to ground-water contamination incidents; and
- Shutdown of operations.

### SUMMARY:

- RCRA personnel training requires classroom or on-the-job training.
- Online training such as computer-based training is an acceptable format as classroom training since no specific format is required for RCRA personnel training.
- RCRA personnel training must meet the minimum requirements whether in a classroom or online.

Excerpts from WAC 173-303-330 and 40 CFR 264.16 are attached to the e-mail. If you have any questions, contact me at [Paul W. Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** RCRA Personnel Training and Classroom Training vs. Online Training

### WAC 173-303-330 Personnel training.

(1) Training program. The facility owner or operator must provide a program of classroom instruction or on-the-job training for facility personnel. This program must teach personnel to perform their duties in a way that ensures the facility's compliance with this chapter 173-303 WAC, must teach facility personnel dangerous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed, must ensure that facility personnel are able to respond effectively to emergencies, and must include those elements set forth in the training plan required in subsection (2) of this section. In addition:

- (a) The training program must be directed by a person knowledgeable in dangerous waste management procedures, and must include training relevant to the positions in which the facility personnel are employed;
- (b) Facility personnel must participate in an annual review of the training provided in the training program;
- (c) This program must be successfully completed by the facility personnel:
  - (i) Within six months after these regulations become effective; or
  - (ii) Within six months after their employment at or assignment to the facility, or to a new position at the facility, whichever is later.
- (d) Employees hired after the effective date of these regulations must be supervised until they complete the training program; and
- (e) At a minimum, the training program must familiarize facility personnel with emergency equipment and systems, and emergency procedures. The program must include other parameters as set forth by the department, but at a minimum must include, where applicable:
  - (i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
  - (ii) Key parameters for automatic waste feed cut-off systems;
  - (iii) Communications or alarm systems;
  - (iv) Response to fires or explosions;
  - (v) Response to ground-water contamination incidents; and
  - (vi) Shutdown of operations.

## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** RCRA Personnel Training and Classroom Training vs. Online Training

### 40 CFR §264.16 Personnel training

(a)

(1) 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 the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section.

[*Comment:* Part 270 of this chapter requires that owners and operators submit with part B of the RCRA permit application, an outline of the training program used (or to be used) at the facility and a brief description of how the training program is designed to meet actual job tasks.]

(2) This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

(3) At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

- (i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- (ii) Key parameters for automatic waste feed cut-off systems;
- (iii) Communications or alarm systems;
- (iv) Response to fires or explosions;
- (v) Response to ground-water contamination incidents; and
- (vi) Shutdown of operations.

**(4)** For facility employees that receive emergency response training pursuant to Occupational Safety and Health Administration (OSHA) regulations 29 CFR 1910.120(p)(8) and 1910.120(q), the facility is not required to provide separate emergency response training pursuant to this section, provided that the overall facility training meets all the requirements of this section.

*[Note that WAC 173-303 does not include an equivalent regulation to 40 CFR 264.16(a)(4) concerning a facility not having to provide separate emergency response training if employees have received OSHA emergency response training.]*