

| <u>SUBJECT</u> | | <u>DATE</u> |
|--|---------------|--------------|
| 1253. Used Oil Filter Regulation – The Feds vs. Washington State | ENCORE | NOV 16, 2017 |
| 1254. PCB Radioactive Wastes and Exception Reporting | ENCORE | NOV 21, 2017 |
| 1255. Satellite Accumulation Requirements and Container Inspections | ENCORE | NOV 30, 2017 |
| 1256. Disposing of PCB Ballasts with PCB Potting Material | ENCORE | DEC 7, 2017 |
| 1257. Fluorescent Light Ballasts and PCB Annual Reporting | | DEC 14, 2017 |
| 1258. 'Twas the Night Before Christmas – The Twenty-Fifth Annual Edition | | DEC 21, 2017 |
| 1259. The Purpose of Keeping Containers Closed Except When Adding or Removing Wastes | ENCORE | DEC 28, 2017 |
| 1260. Satellite Accumulation and Product Vessel Cleanouts | ENCORE | JAN 4, 2018 |
| 1261. Conservative Declaration that Material is a Hazardous Waste | ENCORE | JAN 11, 2018 |
| 1262. Defining Criteria for Household Waste Exclusion | ENCORE | JAN 18, 2018 |
| 1263. The Household Waste Exclusion and Renovation Debris | ENCORE | JAN 25, 2018 |
| 1264. The Household Waste Exclusion and Renovation Debris – Part II | ENCORE | FEB 1, 2018 |
| 1265. The Mixtures Rule – Washington State vs. The Feds | ENCORE | FEB 8, 2018 |
| 1266. Spent Lead-Acid Batteries and Secondary Containment | ENCORE | FEB 15, 2018 |
| 1267. Spent Lead-Acid Batteries and Accumulation Time Limits | ENCORE | FEB 23, 2018 |
| 1268. CERCLA Hazardous Substances – A Brief Definition | ENCORE | MAR 1, 2018 |
| 1269. Radioactively Contaminated Lead-Acid Batteries and Hazardous Debris | ENCORE | MAR 8, 2018 |
| 1270. RCRA Treatment and the Two-Part Definition | ENCORE | MAR 15, 2018 |
| 1271. Who Wants to be a Generator!!! | ENCORE | MAR 22, 2018 |
| 1272. Who Wants to be a Generator Part 2!!! | ENCORE | MAR 29, 2018 |
| 1273. “No Smoking” Signs and Tobacco-Free Facilities | | APR 5, 2018 |
| 1274. Aqueous Solutions and the Characteristic of Corrosivity | ENCORE | APR 12, 2018 |
| 1275. Aqueous Solutions and the Characteristic of Ignitability | ENCORE | APR 19, 2018 |
| 1276. PCB Bulk Product Wastes and the One Year Disposal Requirement | ENCORE | APR 26, 2018 |
| 1277. PCB Radioactive Wastes and Exception Reporting | ENCORE | MAY 3, 2018 |
| 1278. TSCA/PCB Determinations for Fluorescent Light Ballasts via the Manufacture Date | ENCORE | MAY 10, 2018 |
| 1279. RCRA Liquids, Free Liquids, and Releasable Liquids | ENCORE | MAY 17, 2018 |
| 1280. Satellite Accumulation Areas and the Three-Day Time Limit for Excess Accumulation | | MAY 24, 2018 |
| 1281. Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit | ENCORE | MAY 31, 2018 |
| 1282. Universal Waste and Basis for the One Year Accumulation Time Limit | ENCORE | JUN 7, 2018 |
| 1283. F001 Degreaser versus F002 Solvent | ENCORE | JUN 14, 2018 |
| 1284. Hazardous Waste Determinations and Phase Separation | ENCORE | JUN 20, 2018 |
| 1285. PCB Certificates of Disposal and Manifesting Between Related Facilities | | JUN 28, 2018 |
| 1286. PCB Concentrations and 10,000 PPM | ENCORE | JUL 5, 2018 |
| 1287. PCB Concentrations and 1,000 PPM | ENCORE | JUL 12, 2018 |
| 1288. Satellite Accumulation Containers and the Date of Accumulation Marking | | JUL 19, 2018 |
| 1289. Satellite Accumulation Requirements in Washington State | ENCORE | JUL 26, 2018 |
| 1290. Satellite Accumulation Areas and Under the Control of the Operator | | AUG 2, 2018 |
| 1291. Exceptions to Free Liquids in Landfills Prohibition | ENCORE | AUG 9, 2018 |
| 1292. Ampules and the Exception to Free Liquid in Landfills Prohibition | | AUG 16, 2018 |
| 1293. Overpacks vs. Salvage Drums | ENCORE | AUG 23, 2018 |
| 1294. Universal Wastes - Recycling versus Disposal | ENCORE | AUG 30, 2018 |
| 1295. Universal Waste One Year Accumulation and Multiple Handlers | ENCORE | SEP 6, 2018 |
| 1296. Universal Waste and Multiple Handlers at One Facility | | SEP 13, 2018 |
| 1297. Universal Waste, Satellite Accumulation and Centralized Collection Areas | | SEP 20, 2018 |
| 1298. Available Regulatory Relief from Underlying Hazardous Constituent (UHC) Requirements | ENCORE | SEP 27, 2018 |
| 1299. Satellite Accumulation and the One Year LDR Prohibitions on Storage | ENCORE | OCT 4, 2018 |
| 1300. Purpose of the ≤90-day Hazardous Waste Accumulation Conditional Exclusion | ENCORE | OCT 11, 2018 |
| 1301. Regulatory Status of Used Oil Mixed with Diesel Fuel | | OCT 18, 2019 |
| 1302. Recyclable Chemicals and Zombie Destruction | ENCORE | OCT 25, 2018 |
| 1303. Empty Containers and the “Empty” Label | | NOV 1, 2018 |
| 1304. Manifest Exception Report Submittal Timeframes – RCRA vs. TSCA | | NOV 8, 2018 |
| 1305. Smoke Detector Disposal and the NRC | ENCORE | NOV 15, 2018 |
| 1306. Smoke Detector Disposal and Well-Meaning Waste Minimization | ENCORE | NOV 21, 2018 |
| 1307. Characteristic Ignitable, Corrosive or Reactive Debris and Macroencapsulation | ENCORE | NOV 29, 2018 |
| 1308. Disposal Requirements for Hazardous Waste Treated to LDR Standards | ENCORE | DEC 6, 2018 |
| 1309. Disposal Relief for Listed Hazardous Debris Treated to LDR Standards | ENCORE | DEC 13, 2018 |
| 1310. 'Twas the Night Before Christmas - The Twenty-Sixth Annual Edition | ENCORE | DEC 20, 2018 |
| 1311. Product Storage Tank Residues and Hazardous Waste Regulations | ENCORE | DEC 27, 2018 |
| 1312. RCRA Personnel Training and Classroom Training vs. Online Training | ENCORE | JAN 3, 2019 |

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TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

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

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

DATE: JANUARY 3, 2019

| <u>CHPRC Projects</u> | <u>CH PRC - Env. Protection</u> | <u>MSA</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:

"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.

FROM: Paul W. Martin

DATE: 1/3/19

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PG: 1

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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.

FROM: Paul W. Martin

DATE: 1/3/19

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PG: 2

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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.*]