



## RCRA 8-Hour Compliance Course Outline



**Prerequisites:** This course shall have no formal pre-requisite.

**Course Length:** 8 hours – Course length shall vary depending on the number of delegates. Total course time includes breaks.

**Class Size:** The maximum number of delegates that may be trained and tested per instructor shall be thirty-five (35) in the classroom session.

### Course Objective

- To provide delegates an overview of RCRA that can be used to perform their duties in compliance with the regulations.
- To inform delegates about the hazards associated with the management of hazardous waste.
- To prepare delegates to prevent injury or incident using hazard communication, personal protection equipment, and safe work procedures.
- To understand hazardous waste management procedures, including complying with accumulation and storage requirements.
- To provide delegates with techniques to respond effectively to hazardous waste emergencies in the workplace.

### Course Design

- Power Point© / Lecture / Audio Video / Visual Aids

### Successful Course Completion

- Requires a minimum score of 75% or better.
- Grades shall be calculated by dividing the number of questions answered correctly by the total number of exam questions.
- Delegates will have no more than thirty (30) minutes to complete the exam.

### Course Content Summary

- Classroom

**Breaks:** 10 minutes (approximately every hour)

**Lunch:** 1 hour

### Course Outline

About HAZMAT

- Hazardous Material Transportation Act (HMTA)

- Hazardous Material Regulations
- Enforcement Authorities
- Penalties
- Employee Training Requirements
- Administrative Training Requirements
- HAZMAT Definitions
  - Hazardous Material
  - HAZMAT Employee
  - Cycle of Transportation
  - Shipper
  - Hazardous Substance
  - Reportable Quantity (RQ)
  - Marine Pollutant
- Hazard Classes
  - Class 1 – Explosives
  - Class 2 – Compressed Gases
  - Class 3 – Flammable Liquids
  - Class 4 – Flammable Solids
  - Class 5 – Oxidizers and Organic Peroxides
  - Class 6 – Poisonous and Infectious Materials
  - Class 7 – Radioactive Materials
  - Class 8 – Corrosive Materials
  - Class 9 – Miscellaneous Hazardous Materials
- Five Steps to HAZMAT Compliance

#### Step 1 – Classification

- Obtain Shipping Description
- Review the Hazardous Material Table
  - Column 2 – Material Description, Proper Shipping Name
  - Column 3 – Hazard Class/Division
  - Column 4 – Identification Numbers

#### Step 2 – Packaging

- General Packaging Requirements
- Review Hazardous Material Table
  - Column 5 – Packing Groups
    - PG I, II, III
  - Column 7 – Special Provisions
  - Column 8 – Packaging Requirements



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- UN Specification Codes
  - Example on Box and Drum
- Performance Orientation Packaging Example

### Step 3 – Marking/Labeling

- Marking Requirements
- Labeling Requirements
- Marking/Label Sizes
- Marking/Label Examples
- Additional Labels on Package
- Additional Container Markings

### Step 4 – Shipping Papers

- General Requirements
- Shipping Paper Examples
- Additional Requirements
- Shipper's Certification
- Hazardous/Non-Hazardous Materials
- Accessibility
- Retention
- Emergency Response Information
- Emergency Response Guidebook
  - Define colored sections

### Step 5 – Placarding

- General Requirements
- Placard Examples
  - Required Size
- Placard Determination
  - Non-Bulk
  - Bulk
- Placarding Empty or Unpurged Tanks
- Placard Location/Visibility
- Placard Flow Chart

### HAZMAT Safety

- Loading/Unloading HAZMAT
- Review HAZMAT Segregation Charts
- Carrier Requirements



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- Highway
  - Air
  - Rail
  - Water
- Vessel Segregation Chart

### HAZMAT Security Awareness

- Training Requirements
- Awareness
- Recognition
- Potential Targets
- Security Risks
- Security Checklist
- Security Plans

### Resource Conservation and Recovery Act

- Overview of RCRA
- Goals of RCRA
- The 3 Elements
  - The Act
  - The Regulations
  - Guidance and Policies
- Related Acts and Regulations
  - CERCLA
  - Clean Air Act
  - Clean Water Act
  - SARA
  - EPCRA
  - HAZWOPER
- Subtitles and their Provisions

### Identification and Listing of Hazardous Waste

- Terms
  - Solid Waste
  - Hazardous Waste
  - Exclusions
  - Cradle-to-Grave
  - Generators
  - Transporters

- Treatment, Storage, and Disposal Facilities (TSDF)
- Identification Criteria
  - Is the material in question a solid waste?
  - Is the material excluded from the definition of solid waste or hazardous waste?
  - Is the waste a listed or characteristic hazardous waste?
    - Toxic listed waste
    - Acute hazardous waste
    - Characteristic hazardous waste
  - Identification Criteria: Listed Wastes
    - F list
    - K list
    - P and U lists
  - Is the waste delisted?
- Characteristics of Hazardous Wastes
  - Ignitability
  - Corrosivity
  - Reactivity
  - Toxicity
- Special Regulatory Conventions
- Mixed Wastes

#### Hazardous Waste Generators

- Three categories - based on the amount of hazardous waste generated per calendar month
- LQGs and SQGs Requirements
- VSQG/CESQGs Requirements
- Importing/Exporting
- Farmer exclusions and Academic entities

#### Transporters of Hazardous Waste

- Definitions
  - Regulated transporter
  - Transfer Facilities
- The RCRA Subtitle C regulation requirements
- EPA Identification Number
- The Manifest
  - Required Forms
  - General Requirements
  - Required Information on Completed Forms

- Using the Manifest System
  - The Electronic Manifest
  - Rejected Waste
  - Manifest Requirements for Water and Rail Transporters
  - Special Exemptions for Resource Recovery and Recycling
- Handling Hazardous Waste Discharge
  - Must be prepared for an accident
  - Notification and diking
  - Contacting NRC
  - Role of NRC and local authorities
- Additional Regulatory Requirements
  - Transporters becoming storage facilities
  - Transporters becoming generators

#### TSD Facilities

- Overview
- Definitions
  - Treatment
  - Storage
  - Disposal
  - Disposal facilities
    - Permitted facilities
    - Interim status facilities
- Operation and Management Standards
  - Compliance with:
- Standards for the variety of TSDF units
- Closure
  - Requirements
  - Post closure/Final disposal
- Financial assurance
  - Closure
  - Liability
- Ground Water and Air Resources
  - Ground Water Protection
  - Air Resources Protection

#### Land Disposal Restrictions

- Overview
- Components
  - Disposal Prohibition
  - Dilution Prohibition



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- Storage Prohibition

### Hazardous Waste Combustion

- Overview
- Regulations

### Hazardous Waste Permit Program

- Permitting
- Permitting Scope
- Permitting Process
- Various Types of Permits
  - Interim Status
  - Special Provisions
  - Standardized Permit

### State Hazardous Waste Programs

- Overview
  - State Authorization

### Specific Hazardous Wastes and Facilities

- Part 266

### Universal Waste Management

- What is Universal Waste?
- Universal Waste Program

### Used Oil

- Overview
- Regulation
  - Recycling Presumption
- Identification
- Used Oil as a Hazardous Waste
  - Rebuttable Presumption
- Storage Requirements
- Burning Restrictions

### Underground Storage Tanks

- Overview
- Regulatory Requirements

### Training Center Provided Material

- Course Materials



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### Delegate Requirements

- None

### Reference Material / Documents

Title 40 of the CFR, Parts 239-282

DOT 49 CFR 171-180