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REQUIRED

HAZARDOUS WASTE MANAGEMENT TRAINING

Mandatory training required by the EPA, OSHA, DOT, and others for hazardous waste generators, haulers, and disposal facilities.

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PERSONNEL TRAINING REQUIREMENTS FOR HAZARDOUS WASTE GENERATORS, TRANSPORTERS, AND TREATMENT/STORAGE/DISPOSAL FACILITIES

Authored by the hazardous-waste management experts at PegEx.com.

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I. ABSTRACT:

The Resource Conservation and Recovery Act (RCRA) mandates that all personnel involved in hazardous waste management have job-specific training under penalty of law. This white paper focuses upon personnel-training requirements in three broad areas of hazardous waste management:(1) Generation, (2) Transport, and (3) Treatment/Storage/Disposal Facilities.

II. INTRODUCTION:

A. Historical perspective

The Environmental Protection Agency (EPA) was created a half-century ago by Republican president Richard M. Nixon.

By way of history, during the late 1950's and throughout the 1960's there was increasing public concern about environmental degradation. Such alarm was intensified by the 1962 publication of Rachel Carson's phenomenal best-seller *Silent Spring*, which detailed (and many would say exaggerated) the detrimental ecological and health effects of DDT and other pesticides.

Congress reacted by holding hearings about what should be the legal and regulatory response to the public's concern, spawning a number of different bills that eventually coalesced into the National Environmental Policy Act of 1969 (NEPA), which President Nixon signed into law on New Year's Day, 1970.

NEPA was intended to establish a "Council on Environmental Quality" in the Executive Office of the President. It would set national environmental policy as well as require an annual "environmental report" to be filed for all federal actions deemed to affect the environment: what we now call an "environmental impact statement."

To accommodate this process, President Nixon proposed an "executive reorganization" that would consolidate (under one organization) the myriad of environmental responsibilities co-opted by the federal government. It was to be called the "Environmental Protection Agency," aka the "EPA."

Both the House and the Senate approved the Nixon proposal, and so the EPA was born.

1. The Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) was enacted in 1976 and remains the principal federal guideline for governing hazardous waste management, establishing the framework for its legal and proper generation, disposal, and storage.

2. Are you a hazardous waste generator?

If you're doing *something* that's resulting in a big pile of almost *anything* accumulating in your waste pile, there's a good chance that "something" is considered a hazardous waste by one or another federal agency.

The RCRA makes it remarkably easy to be a hazardous-waste generator. E.g., the moment you uncork a can of solvent and use it, you have joined the ranks.

True, you might only generate a single quart of waste solute per week, but the improper disposal of even that small amount can land you squarely in the cross hairs if the EPA.

B. The Resource Conservation and Recovery Act

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C. The "cradle-to-grave" concept

Integral to the RCRA is the so-called "cradle to grave concept." It stipulates that you're responsible for any hazardous waste you create from its initial generation to its ultimate treatment and/or disposal.

Thereby, you're not only accountable for a hazardous waste from the moment it's generated; you're also legally responsible for its safe transportation to wherever it will be ultimately processed or disposed of.

Or another way to look at it: Once you've generated a hazardous waste, there is no way to rid yourself of complete responsibility for it. You're culpable for any improper offsite transportation and disposal—should such a thing happen—along with all the legal and financial liabilities thereto, not to mention the public-relations nightmare that goes along with being labeled a "polluter."

3. So what exactly is a hazardous waste?

The answer has been a moving target since the EPA began 50 years ago. In the agency's own words:

> "Proper identification of a hazardous waste can be a difficult and confusing task, as the RCRA regulations establish a complex definition of the term 'hazardous waste.' To help make sense of what is and is not a hazardous waste, this module presents the steps involved in the process of identifying, or 'characterizing,' a hazardous waste."
>
> "After reading this module, you will be able to explain the hazardous waste identification process and the definition of hazardous waste, and be familiar with the following concepts: hazardous waste listings, hazardous waste characteristics, the 'mixture' and 'derived-from' rules, the 'contained-in' policy, (and) the Hazardous Waste Identification Rules (HWIR)."

However, remember that the EPA might also consider as a "hazardous substance" any number of wastes reasonably definable under the Clean Air Act, the Clean Water Act, the Toxic Substances Control Act, the RCRA, or the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA.)

D. Personnel training requirements: general considerations

The Resource Conservation and Recovery Act (RCRA) mandates that the person you have in charge of disposing hazardous waste must have job-specific training about how to handle and remove chemical, biohazard, and radioactive wastes safely.

While the academic requirements to become a hazardous waste manager vary across employers, in virtually all cases the minimum educational prerequisite is—or should be—an undergraduate degree.

Usually, that degree must be in chemistry or biochemistry, environmental science or engineering, waste management, or toxicology. Additional coursework might be required, such as workplace hazards management information systems training (WHMIS), instruction about workplace emergencies involving hydrogen sulfide gas (H2S Alive), and training about the transportation of dangerous goods (TDG).

Thus, given the high legal, financial, and ethical stakes involved in hazardous material disposal, it is not atypical for larger private and public entities to require a graduate degree of those who aspire to hazardous waste management leadership.

E. Continuing education requirements

The RCRA requires that your facility personnel be certified to "perform their duties in a way that ensures the facility's compliance" with hazardous waste regulations. Yearly recertification is required, and includes but is not limited to:

- *In general:* Refresher coursework including updates on differentiating solid waste from hazardous waste; understanding waste codes, disposal options, and land ban requirements; determining your generator status; satellite accumulation vs. permanent storage; container requirements; facility standards, recordkeeping mandates; etc.

- *As to transportation:* Continuing education about hazardous waste transportation including the selection of transporters as well as TSDFs (treatment, storage, and disposal facilities); profiling wastes to minimize disposal costs; manifest preparation and recordkeeping; land disposal restrictions; DOT requirements; etc.

4. Ignorance of the law is not an excuse.

There needn't be criminal intent to make trouble for yourself.

Running afoul of EPA regulations under the (RCRA) innocently or otherwise can net you a fine of up to $70,117 per day per violation.

Violations under the Clean Air Act have a $93,759 ceiling; and those under the Clean Water Act are as high as $51,570.

Violations under the Safe Drinking Water Act; Emergency Planning and Community Right-to-Know Act; and/or Comprehensive Environmental Response, Compensation, and Liability Act run as high as $53,907.

And then there's the Federal Insecticide Fungicide and Rodenticide Act—in the neighborhood of $18,750.

- *As to differentiating among wastes*: A review of characteristics for universal wastes, waste oils, electronic waste, and metal waste; as well as addressing various updated requirements for their respective treatments and disposal.

- *As to legal requirements:* Updates to liability and due diligence concerns; RCRA enforcement trends, latest RCRA preferences for organization and management of compliance data; etc.

F. Other environmental agencies and authorities

A waste that you might regard as an innocent "tossable" might be considered an environmental pariah by one or more of a myriad of federal agencies, and under a growing number of legal acts. Other federal and state agencies and authorities propagate their own rules that require personnel training. For example:

- The Occupational Safety and Health Administration (OSHA) regulates potential employee exposure to hazardous substances.

- The National Institute of Occupational Safety and Health (NIOSH) concerns itself with workplace products that can impact public health

- The Drug Enforcement Agency (DEA) regulates the disposal of controlled substances.

- The Nuclear Regulatory Commission (NRC) is involved when and where there is radioactivity.

- The U.S. Department of Transportation (DOT) concerns itself with the transit of all hazardous waste
- The Centers for Disease Control (CDC) oversees matters of public health relative to hazardous waste.

G. State requirements are often more stringent than their federal counterparts

In matters of hazardous waste disposal, the face of the EPA is likely that of your state—not the federal government. This is because the RCRA directs the EPA to delegate primary responsibility for implementing federal hazardous waste regulations to the individual states.

States must fulfill this mandate with programs that are consistent with federal regulations—and *at least* equally stringent. Of the 50 states, only Alaska and Iowa have not done so as of this writing; they defer to their EPA regional authority.

Perhaps most significantly, individual states can differ from federal guidelines about what constitutes a hazardous waste per se, as well as how it should be handled.

Examples might be an industry-specific waste in a state where that industry is common; or a unique military waste in a state with a large military facility; or where the federal government allows certain waste to be placed in landfills, some states do not.

Also, different states might have different regulations about “lethality” or "severe toxicity” characteristics when determining if something is a hazardous waste; or they might add to the characteristics already in place per the EPA.

For example, a state might tighten the “corrosivity” characteristic by stipulating that otherwise benign materials require hazardous waste handling if they produce pH levels above a certain point when mixed with water (per US LAW 40 CFR 261.22).

Or individual states might make the “toxicity” characteristic stricter by adding to the list of identified contaminants, specifying maximum allowable concentrations, or creating an entirely new category of

5. One ugly case study

Incomplete or improper personnel training can devastate your brand equity. Consider this headline that that appeared in hundreds of news outlets in 2016:

Whole Foods Reaches $3.5 Million Hazardous Waste Settlement…

Their actual sin appeared innocent enough, having to do with how they disposed of customer returns and out-of-date products that were no longer shelf worthy.

These included such seemingly innocuous goods as hand sanitizer, liquor, vitamins, and other products that the EPA classifies as hazardous waste once they can no longer be used for their intended purpose. Employees —untrained in hazmat requirements—just tossed the stuff in the trash.

Remember that Whole Foods strives to make environmental sustainability a major constituent of its brand image. Such values logically correlate with their target customers, who prefer additive-free “whole food” that is minimally processed or refined.

There was no criminal intent. Nonetheless, there was significant damage to the Whole Foods brand image—especially since the settlement tossed the ecologically self-conscious company into the same shopping cart with Walmart, which perpetrated a similar brand fiasco upon itself some years prior.

The lesson: If your waste stream even incidentally includes motor oil, electronics, paints, batteries, light bulbs, defunct smoke detectors, discarded thermometers, spent “vape” cartridges, medical marijuana waste, old electrical transformer parts, dental amalgam, and other seemingly innocuous garbage.

contaminants (unregulated elsewhere) that are locally deemed as “persistent and bioaccumulative toxins.”

Mixture rules can be different from state to state. Per the EPA, any combination of otherwise benign waste that includes a “listed” hazardous waste requires hazardous waste management and hazardous waste disposal specific to the “listed” hazardous waste.

A major exception is mixtures where the constituent hazardous waste is only “listed” because of its ignitability, corrosivity, or reactivity—and no longer exhibits any of these characteristics. But beware: make sure yours is not one of the individual states that disallow this exception.

There are other differences that are less obvious but nonetheless crucial to consider. Among them:

- Some states require annual as opposed to biennial hazardous waste management reports.
- Notification of “regulated waste activity” might require state-specific paperwork in lieu of federal forms.
- Time intervals between required accumulations might be tighter.
- Central accumulation areas might be required for “un-permitted” hazmat generators where the EPA requires them only for “permitted” generators.

Thus, while knowing what the EPA requires is necessary for successful hazardous waste management, it is not sufficient. States can impose regulations that are more restrictive and severe than their EPA counterparts, and they often do. And bungled hazardous waste management can destroy your bottom line—*and your brand equity.* (See inset.)

H. The National Environmental Health Association (NEHA)

The National Environmental Health Association (NEHA) was founded in 1937 by environmental health practitioners in order to establish standards for the profession. These standards are nowadays known as the Registered Environmental Health Specialist/Registered Sanitarian (REHS/RS) credential.

Over time the NEHA has established a number of specialty credentials that indicate competence in specialized areas, and many states require that continuing education coursework—as it has to do with hazardous waste disposal—be provided by sources that are sanctioned by the NEHA for meeting their various standards.

Such sources might be local colleges; or in some cases government or private agencies themselves might be certified by the NEHA to provide continuing education for their employees involved in hazardous material disposal.

Nationally recognized credentials provide an impartial, third-party endorsement of a person's professional competence. Combined with an undergraduate degree in an applicable science, it is your best assurance that the person you place in charge of your hazardous waste management has achieved a baseline level of competence—and that his or her professional tenure (in your enterprise) will not add to your liability should something go terribly wrong.

III. PERSONNEL TRAINING REQUIREMENTS FOR HAZARDOUS-WASTE GENERATORS

A. Overview

If you are considered a Large Quantity Hazardous Waste Generator (LGQ) by the EPA, specialized training is required for all your "hazardous waste personnel" within six months of bringing them onboard.

The EPA defines "hazardous waste personnel" as anyone on your staff whose actions—or inactions—might result in noncompliance with applicable RCRA regulations.

Put another way: it's *anybody and everybody* involved in selecting, marking, labeling, inspecting, moving, or otherwise handling your hazardous waste containers.

Also note: *all staff* must be adequately trained who deal with your hazardous waste, either daily or incidentally—not just your emergency responders, but also personnel whom you might not consider at first blush.

7. EPA size categories for hazardous waste generators

Very Small Quantity Generators (VSQGs) generate 1000 kilograms or less per month of acutely hazardous waste.

Small Quantity Generators (SQGs) generate more than 100 kilograms, but less than 1,000 kilograms of hazardous waste per month.

Large Quantity Generators (LQGs) generate 1,000 kilograms per month or more of hazardous waste or more than one kilogram per month of acutely hazardous waste.

E.g., if your accountant doesn't occasionally rolls up her sleeves to help move around a few barrels of hazmat, she still might be considered "hazardous waste personnel" if she's somehow involved in "reading and applying" federal and/or state hazardous waste regulations.

Also bear in mind that such training is required of any outside contractors who might assist you with onsite hazardous waste management—or who might incidentally produce hazardous waste on your site (such as painters, repair companies, or renovators).

B. Exceptions for newest personnel

New hires can work under the direct supervision of a trained person for up to six months, which is the same for contractors: their employees can assist with your hazmat management *if* directly supervised by a trained person—but only once, and for a period less than six months.

C. Course content for hazardous-waste generator personnel

Your designated hazardous waste personnel must complete a program of classroom instruction, online training, and/or in-service training that enables them to ensure compliance with RCRA regulations.

Minimally, this includes training in emergency response procedures, application of emergency equipment, and the operation of emergency systems. And they must complete RCRA refresher training annually to remain in compliance.

However, whoever manages your entire hazardous waste program will likely need more training; and it is solely up to you to ensure that all your personnel are adequately trained to maintain compliance with RCRA regulations.
The EPA provides a convenient laundry list of more-specific required topics, which you can learn more about here. They include:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Key parameters for automatic waste feed cutoff systems
- Communications and/or alarm systems
- Response to fires, explosions, and releases of hazardous waste constituents
- Response to groundwater contamination incidents
- Shutdown of operations
- Evacuation procedures
- Implementation of the facility contingency plan

D. So who can provide the required training for hazardous waste management?

Ironically enough, the EPA doesn't approve, certify, or otherwise accredit people or programs for providing the breadth of specialized training required by the agency. Suffice to say, such training must be directed by a person trained in hazardous waste management procedures.

To traverse such a minefield, make sure the trainers you hire can present documentable evidence of extensive experience with hazardous waste management; that their instructors are experienced at *teaching*; and that they're supported by research staff who keep them abreast of EPA regulations.

E. Documentation requirements

As an LQG, you're required to maintain specific training records for your hazardous waste management personnel. The name, title, and job description for each must be extant with a detailed description of the amount and type of training he or she has received.

F. Requirements for VSQG and SQG entities

VSQG and SQG hazardous waste personnel need only be “thoroughly familiar” with proper waste handling and emergency response procedures, per the EPA.

Although there’s no specific requirement for VSQGs or SQGs to have documented proof of individual training, common sense dictates the need for it. An inspector could ask for proof, and not being able to present it on demand is going to invite closer-than-usual scrutiny.

Minimally you should document dates and provide descriptions of hazmat training sessions for your VSQG and SQG personnel. Also, have sign-in sheets to record which of your employees have attended them.

IV. PERSONNEL TRAINING REQUIREMENTS FOR HAZARDOUS-WASTE TRANSPORTERS

A. Overview

Federal training requirements for hazmat waste transporters are primarily regulated simultaneously by three different agencies: the EPA, Occupational Safety and Health Administration (OSHA), and the federal Department of Transportation (DOT). However, there are also requirements enforced by the Federal Motor Carrier Association (FMSCA) and the Transportation Safety Administration (TSA). By way of review:

- The EPA is an independent agency of the federal government. It is charged with consolidating federal research, monitoring, standard-setting, and enforcement activities into one agency.
- OSHA concerns itself with health & safety standards for both private- and public-sector employees.
- The federal DOT oversees all facets of transportation: cars, trains, trucks, planes, boats.
- The FMSCA administers rules that stipulate how hazardous material is properly classed, described, packaged, marked, and labeled for transit.
- The TSA conducts background checks as part of the hazmat-hauler application process, which take up to 60 days to complete.

B. Federal Regulatory Hierarchy

The Occupational Safety and Health Act (OSH) that created the agency states that OSHA does not own jurisdiction over workplace health & safety if another federal agency exercises statutory authority in this area.

U.S. courts interpret this peculiarity of the OSH using a so-called “gap theory” or “hazard-by-hazard” approach. E.g., if the DOT has a regulation that would reduce or eliminate a workplace hazard, its regulations are applicable. If it doesn’t, then OSHA regulations apply.

Ergo, the authority that decides which agency is *alpha* are "the courts," which would suggest that such interpretations are forthcoming *after* you've done something one or the other agency believes to be environmentally malfeasant, instigating time-consuming litigation between the two.

C. EPA and DOT co-authority

In deference to the fact that hazardous waste transporters use public roads, highways, rails, and waterways—regulations for container specifications, labeling, marking, and placarding are primarily developed by the DOT, with EPA input.

Concerns primary to the EPA that your staff need to know about:

- *EPA Identification Numbers.* The EPA requires all hazmat haulers to have an EPA ID number, which is assigned to a transportation company as a whole rather than requiring each of its trucks to have its own unique ID.

- *Hazardous waste manifests.* The EPA requires that a manifest accompany the movement of a hazardous waste "cradle to grave." This manifest indelibly attaches a waste to your enterprise as it migrates from its point of origin to its ultimate destination facility—be it storage, treatment, recycling, or whatever.

- *Accidental discharges.* Hazmat transport drivers must be properly trained to take immediate action in the event of an accidental hazmat discharge, including but not limited to notifying local authorities, and diking the discharge area to protect health and minimize any environmental impact.

Concerns primary to the DOT that they need to know about:

- *CDL-Class A.* As a first requirement, a hazmat hauler must have an active Commercial Driver's License (CDL- Class A)—and a safe driving record. If you or your employee haven't this license already—understand that regulations for its acquisition aren't consistent from state to state. Most states, however, require a learning "permit" period during which a CDL aspirant drives with an experienced CDL holder in the vehicle. In due course, the applicant must pass a driving skills test, usually administered by the state DOT.

- *Hazmat-specific training.* If a person has an active CDL-Class A, safe driving record, and is 21 years of age or older, he or she is duly qualified to make application for hazmat certification. Additional requirements include proof of citizenship or legal residence, medical and optometric exams. There is also a TSA background check.

- *Hazmat knowledge test.* The DOT requires that hazmat drivers be tested for appropriate training in such areas as transit operations between destination points, proper handling of hazardous materials during loading and unloading, safest ways to readjust and re-secure loads while in transit, and more.

D. Comprehensive cross-agency considerations

Given that regulations for hazardous waste transport emanate from five different agencies, it is virtually impossible to provide a list of rules that might remain relatively static over time. Also, in that required training is both "initial and recurrent," it must be updated periodically—usually annually.

With those caveats, below is presented what is necessarily a partial list of training that your hazardous-waste transport employees must receive, as there might be more depending on individual job duties. Among them:

- *Security awareness training* about the security risks associated with hazmat transportation, and specific methods designed to diminish them
- *Function-specific training* relative to the particular knowledge and skills required for an individual to perform assigned hazmat-transport responsibilities properly and safely
- *Safety training* for drivers, warehouse workers, and any other employees who handle any hazardous waste in advance, during, and/or subsequent to its transportation
- *Specialized driver training* pertaining to vehicle inspection and operation; vehicle handling in diverse conditions; and special rules pertaining to tunnels, bridges, and railroads (see FMSCA)
- *Advanced security training* for companies required to have a security plan relative to their hazardous waste management
- *HAZWOPER[1] certification* for employees who must drive onto hazardous waste sites, enter EPA-regulated TSDF, or respond to hazardous waste emergencies

[1]Hazardous Waste Operations and Emergency Response

V. PERSONNEL TRAINING REQUIREMENTS FOR HAZARDOUS-WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES

A. Overview

One of the imperatives of the RCRA is that hazardous waste "generators" are responsible for any hazardous waste they "generate" from "cradle-to-grave," including its subsequent, transportation, treatment, storage, and disposal.

The final stage in this cradle-to-grave concept is the place where the hazardous waste is ultimately laid to rest, so to speak. This must be an approved "treatment, storage, and disposal facility," or a "TSDF."

B. Operational definitions

The EPA defines any site where hazardous waste is intentionally placed as a disposal facility that must comply with a long list of standards, especially if such waste will remain there forever, like after your industrial widget factory has been converted to condos. Per the EPA:

- A "facility" includes all contiguous land, structures, and "appurtenances" on or in the land used for treating, storing, or disposing of hazardous waste.

10. In the EPA's own words…

"…regulations pertaining to TSDFs are more stringent than those that apply to generators or transporters."

- Treatment is any method, technique, or process designed to change the physical, chemical, biological character, or composition of any hazardous waste.

- Disposal is the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid or hazardous waste on or in the land or water.

C. Storage & treatment rules stringency

The EPA itself advises that "regulations pertaining to TSDFs are more stringent than those that apply to generators or transporters." Such regulations include general "good housekeeping" standards for all facilities, but also specific standards, depending on your particular kind of waste and operations.

In sum: your perfectly legal procedures for *handling* hazardous waste might not meet EPA standards for its *storage*.

D. General training considerations for TSDFs

You need be aware of what captures the interest of the EPA in determining if you're operating as a hazardous waste storage facility, know it or not. Again, this is not a comprehensive list. But among other things:

- *Air emissions.* To determine any presence of volatile organic compounds (VOCs), your ventilation, waste treatment processes, and equipment will be inspected along with your storage impoundments, tanks, and containers.

- *Groundwater*. The EPA is particularly vigilant about groundwater contamination. Thus, a storage facility is required to have monitoring wells that regularly sample groundwater.

- *Financial Assurance*. A storage facility must prove it has the financial wherewithal to respond adequately to an accidental spill or release, and/or cease operations while maintaining financial viability temporarily to do so.

11. Third-party endorsements

A nationally-recognized third-party endorsement is your best assurance that the persons in charge of your hazmat management have achieved a baseline level of competence—and that their professional tenure (in your enterprise) will not add to your liability should something go wrong.

E. Specific training requirements for TSDF personnel

Given all that, it is obviously important to know what kinds and amounts of personnel training the EPA demands for your TSDF hazardous waste management.

As mentioned earlier, while the academic requirements to become a hazardous waste manager vary across employers, in virtually all cases the minimum educational prerequisite is an undergraduate degree.

Chemistry, biochemistry, eco-science, environmental engineering, waste management, or toxicology degrees are common. But the person you have in charge of disposing hazardous waste must additionally have job-specific training about how to handle and remove chemical, biohazard, and radioactive wastes safely.

Such ancillary coursework typically includes workplace hazards management information systems training (WHMIS), instruction about workplace emergencies involving hydrogen sulfide gas (H2S Alive), and training about the transportation of dangerous goods (TDG).

Training provided by a nationally-recognized third-party endorser is your best assurance that the persons in charge of your hazmat management have achieved a baseline level of competence—and that their professional tenure (in your enterprise) will not add to your liability should something go wrong

F. Continuing education requirements for TSDF personnel

The Resource Conservation and Recovery Act (RCRA) requires that your facility personnel be certified to “perform their duties in a way that ensures the facility’s compliance” with hazardous waste regulations. Yearly recertification is required, and includes but is not limited to:

- *In general.* Refresher coursework including updates on differentiating solid waste from hazardous waste; understanding waste codes, disposal options, and land ban

requirements; determining your generator status; satellite accumulation vs. permanent storage; container requirements; facility standards, recordkeeping mandates; etc.

- *As to differentiating among wastes*. A review of characteristics for universal wastes, waste oils, electronic waste, and metal waste; as well as addressing various updated requirements for their respective treatments and disposal.

- *As to legal requirements.* Updates to liability and due diligence concerns; RCRA enforcement trends, latest RCRA preferences for organization and management of compliance data; etc.

G. State-specific requirements

As you might guess, different states have different requirements for ongoing certification. For example, in California the requirement is 24 contact hours of continuing education every two years. As in many states, these courses must be approved by REHS Continuing Education Accreditation Agencies.

12. Recordkeeping requirements

The EPA permitting system required to ensure that all TSDF disposal practices are in legal compliance is formidable. It's essential to have systems in place to accurately track the ebb & flow of your hazardous waste management.

The PegEx Platform is software specifically designed for hazardous waste management. It will consistently and accurately populate various EPA forms with numbers, codes, and other data across the multitude of legal documentation required by state and federal authorities.

Find out more here; or contact us to talk to a hazardous waste management software expert.