

QUESTION: A private laboratory generates a variety of hazardous wastes. The lab has about 200 lab technicians who may handle the wastes. Must these lab technicians be trained to handle hazardous waster, and, if so, must there be documentation of their training?

ANSWER: The lab technicians must have training to the extent necessary to ensure safe handling of the wastes. Per §262.34 (a) (4), the generator must comply with §265.16 on training of personnel handling hazardous waste. Section 265.16 (d) requires that training records be kept at the facility. The generator could categorize positions (i.e., supervisors, lab technicians, etc.) and list the individuals names in those categories with a description of the training for that group.

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