

RCRA, SUPERFUND & EPCRA CALL CENTER MONTHLY REPORT
April 2002

1. Universal Waste Employee Training Requirements

The universal waste regulations in 40 CFR Part 273 instruct handlers of universal waste to train all employees in waste handling and emergency procedures (Sections 273.16 and 273.36). Under the Subtitle C program, large quantity generators (LQGs) of hazardous waste must comply with the personnel training requirements of Section 265.16, which specify an annual review of the initial training (Section 265.16(c)). Are universal waste handlers also required to take part in an annual review of the initial employee training?

Universal waste handlers are not required to conduct an annual review of the initial employee training. Handlers of universal waste need only comply with the employee training requirements in Part 273. For example, small quantity handlers must inform all employees who handle universal waste of the proper waste handling procedures appropriate to the type of universal waste handled at the facility (Section 273.16). Large quantity handlers must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures (Section 273.36). A universal waste handler must provide annual training reviews only if the handler is also a LQG (Section 265.16(c)).