

## 2. Contractors and Hazardous Waste Training Requirements

Pursuant to 40 CFR §§264/265.16, owners and operators of hazardous waste treatment, storage, and disposal facilities (TSDFs) must ensure that facility employees complete a training program that teaches them to perform their duties in a way that ensures the facility's compliance with the Part 264/265 requirements. Are contractors working at TSDFs required to comply with the training program requirement?

Section 260.10 defines facility personnel as "all persons who work at, or oversee the operations of, a hazardous waste facility, and whose actions or failure to act may result in noncompliance with the requirements of Part 264 or 265 of this chapter." Contractors working at a TSDF are held to the same standards as non-contract facility personnel and therefore must complete the appropriate training program.

In addition, because large quantity generators (LQGs) of hazardous waste are required to comply with the interim status training requirements at §265.16 (§262.34(a)(4)), contractors at LQG facilities that meet the definition of facility personnel under §260.10 are also required to meet the personnel training provisions.