



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
LAND AND EMERGENCY
MANAGEMENT

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COVERSHEET: EXPLANATION OF CITATION AND/OR TERMINOLOGY CHANGES IN THIS POLICY DOCUMENT

This policy document remains wholly in effect, but some or all of the regulatory citations within it have changed. These changes do not alter the existing regulatory interpretations.

As part of the [2016 Hazardous Waste Generator Improvements Rule](#), many of the regulations that apply to hazardous waste generators were moved to, or reorganized within, title 40 of the Code of Federal Regulations (CFR) part 262. To view a crosswalk between the old and new citations, please visit the [Hazardous Waste Generator Regulations Crosswalk webpage](#).

The Hazardous Waste Generator Improvements Rule also made changes to terms that may be included in this document. The most common term change was replacing “conditionally exempt small quantity generators” (CESQGs) with “very small quantity generators” (VSQGs). In addition, EPA defined the term “central accumulation area” (CAA) to mean a generator’s 90- or 180-day accumulation area for hazardous waste.

A handwritten signature in black ink that reads "Jessica Young". The signature is written in a cursive, flowing style.

Jessica Young
Chief of the Recycling and Generator Branch
Office of Resource Conservation and Recovery

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.

SOURCE: Tony Baney (202) 475-8728

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