



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

## 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.