

ANNUAL RCRA TRAINING REQUIREMENT REMINDER

Did you know that two of the top violations reported by Illinois EPA and U.S. EPA Region 5 inspectors is the lack of specific annual **RCRA hazardous waste training** and missing or out-of-date **hazardous waste contingency plans**? Recent federal fines levied against Chicago area companies for typical RCRA violations have exceeded \$100,000. The U.S. EPA attorneys recognize the unfair advantage that benefits violators, and ultimately the fines far exceed the initial cost of compliance.

To be in compliance with the Resource Conservation and Recovery Act (RCRA), large quantity generators of hazardous waste are required:

- To have a **hazardous waste contingency plan** and to conduct annual personnel training on the plan and waste management duties.
- To submit copies of the contingency plan to the agencies that would be asked to respond in case of emergency, including police, fire and hazmat responders.
- To keep **meticulous records** including annual employee training records, as well as receipts that document the contingency plan was sent to responding agencies.

Annual personnel training is not just another task to complete. Its purpose is to reduce the potential for mistakes and accidents with the handling of hazardous waste that might endanger employees, those living nearby, or the surrounding environment. RCRA mandates that employees be adequately prepared to manage hazardous waste and respond to emergencies. Annual training to review response procedures as well as everyday waste handling insures that if an inspection were conducted, your facility will not be fined. There are recent cases where the local U.S. EPA office has levied fines specifically for the lack of training records.

Admiral Environmental has extensive experience in preparing individualized contingency plans that comply with RCRA requirements. We are also able to conduct the required training that is specific to your facility, so that your employees may complete their hazardous waste tasks and comply with RCRA standards.

As always, we can assist your efforts for compliance with all of the waste regulations. Please give us a call.

Philip A. Twomey, P.E.

PS: If you are not sure if you will be a Large Quantity Generator for 2010, I suggest you send us your 2010 hazardous waste manifests to review your status.