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RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) - TRAINING REQUIREMENTS FOR RCRA INSPECTORS

These training requirements are in addition to the Basic Inspector Training Course and the Health and Safety Training required by EPA Order 3500.1.

Additional requirements apply depending on what type of inspection will be conducted: Level 1 or Level 2.

Mandatory and Recommended Training and Self-Study/Review Requirements:

Mandatory Training

- RCRA Inspector Training (CD-Rom Computer-Based Training) - NETI RCR 902, <http://www.netionline.com>
- RCRA Confidential Business Information (CBI) Training (Contact Regional RCRA CBI Officer for materials and information on regional process)

Mandatory Self-Study/Review

Guidance/Reference Materials

- RCRA Inspection Manual (1998), <http://www.epa.gov/compliance/resources/policies/civil/rcra/rcrarevinspman-rpt.pdf>
- RCRA On-Line, <http://www.epa.gov/rcraonline>. Inspector must be competent in using online system.
- RCRA Enforcement Response Policy (1996), <http://www.epa.gov/compliance/resources/policies/civil/rcra/erp-mem.pdf>
- RCRA Enforcement Response Policy - Addendum (2000), <http://www.epa.gov/compliance/resources/policies/civil/rcra/041800.pdf>
- Review a minimum of two completed inspection reports for each type of RCRA inspection. The inspector's first line supervisor can require more than two inspection reports for each type of RCRA inspection.

Recommended Training

- The Office of Solid Waste and Emergency Response (OSWER) Sampling for Hazardous Materials Course (165.9) or equivalent commercially available RCRA courses/seminars. (Source: NETI Online, <http://www.netionline.com>)

Recommended Self-Study/Review

- RCRA Civil Penalty Policy, <http://www.epa.gov/compliance/resources/policies/civil/rcra/rcpp2003-fnl.pdf>
- RCRA Orientation Manual (2002), <http://www.epa.gov/epaoswer/general/orientat/rom1.pdf>
- Managing Your Hazardous Waste: A Guide for Small Businesses, <http://www.epa.gov/epaoswer/hazwaste/sqg/sqghand.htm>
- State Hazardous Waste Regulations (as applicable)

Mandatory Refresher Training:

- Program specific refresher training as identified by supervisor.
- New Regulations & Policies: As new regulations and policies are issued, RCRA inspectors are expected to obtain the additional training necessary to ensure that they are sufficiently qualified to lead inspections. It is the responsibility of the first-line supervisor to identify required additional training pertaining to new regulations or policies.

EPA ORDER 3500.1 PROGRAM-SPECIFIC TRAINING REQUIREMENTS

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) - LEVEL 1

RCRA Level 1 - Inspectors who conduct inspections at Conditionally Exempt Small Quantity Generators, Small Quantity Generators, Generators, Transporters, and Used Oil Collection and or Storage Facilities must complete the following training requirements in addition to the requirements listed above for ALL RCRA Inspectors.

Mandatory and Recommended Training and Self-Study/Review Requirements:

Mandatory Training

- None

Mandatory Self-Study/Review

Statutes/Regulations

- The Resource Conservation and Recovery Act (RCRA), <http://www4.law.cornell.edu/uscode/42/ch82sch1.html>
- RCRA Hazardous Waste, Universal Waste, Used Oil Regulations - Hazardous Waste Management System: General; Identification and Listing of Hazardous Waste; Standards Applicable to Generators of Hazardous Waste (40 CFR Parts 260 - 262)
- Standards Applicable to Transporters of Hazardous Waste (40 CFR Part 263)
- Standards for the Management of Specific Hazardous Wastes and Specific Types of Hazardous Waste Management Facilities (40 CFR Part 266)
- Land Disposal Restrictions (40 CFR Part 268)
- Standards for Universal Waste Management (40 CFR Part 273)
- Standards for the Management of Used Oil (40 CFR Part 279)

Guidance/Reference Materials

- RCRA Training Modules: Definition of Solid Waste and Hazardous Waste Recycling; Generators; Hazardous Waste Identification; RCRA Solid Waste Programs; Used Oil; Land Disposal Restrictions; RCRA State Programs; Solid and Hazardous Waste Exclusions; Transporters; and Universal Waste, <http://www.epa.gov/epaoswer/hotline/rmods.htm>

Recommended Training

- None

Recommended Self-Study/Review

- None

Mandatory On-the-Job Training (OJT):

- All RCRA Level 1 inspectors/field investigators are required to participate in OJT by accompanying a senior lead EPA or State RCRA inspector on at least two complete RCRA inspections. Each new RCRA inspector/field investigator also will be required to lead at least two complete RCRA inspections while being observed by an experienced and fully qualified EPA or State RCRA inspector. Note: This includes inspection preparation procedures with a senior inspector. The actual number of inspections required before the inspector is approved to lead inspections will be determined by the inspector's first-line supervisor.

EPA ORDER 3500.1 PROGRAM-SPECIFIC TRAINING REQUIREMENTS

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) - LEVEL 2

RCRA Level 2 - Inspectors who conduct inspections at Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDs) must complete the following training requirements in addition to the requirements listed above for ALL RCRA Inspectors and the requirements listed above for Level 1 Inspectors.

Mandatory and Recommended Training and Self-Study/Review Requirements:

Mandatory Training

- None

Mandatory Self-Study/Review

Statutes/Regulations

- RCRA Hazardous Waste, Universal Waste, Used Oil Regulations - Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities (40 CFR Part 264) Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities (40 CFR Part 265)

Guidance/Reference Materials

- RCRA Training Modules: Air Emission Standards; Containers; Land Disposal Units; Municipal Solid Waste Disposal Facility Criteria; RCRA Corrective Action; RCRA Treatment, Storage, and Disposal Facility Criteria; Tanks; Closure/Post-Closure; Containment Buildings; Drip Pads; Groundwater Monitoring; and Miscellaneous and Other Units
<http://www.epa.gov/epaoswer/hotline/rmods.htm>

Recommended Training

- None

Recommended Self-Study/Review

- None

Mandatory On-the-Job Training (OJT):

- Prior to leading inspections/investigations at TSDs, RCRA Level 2 inspectors/field investigators are required to complete all OJT training associated with Level 1 inspections and participate in additional OJT by accompanying a senior lead Level 2 EPA or State RCRA inspector on at least two complete RCRA inspections at TSD facilities. Additionally, new Level 2 RCRA inspectors/field investigators are required to lead at least two complete RCRA inspections at TSD facilities while being observed by an experienced and fully qualified EPA or State RCRA Level 2 inspector. Note: This includes inspection preparation procedures with a senior inspector. The actual number of inspections required before the inspector is approved to lead inspections will be determined by the inspector's first-line supervisor.