



M&A Safety Services

512 Vialet Road
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Main: 337-451-4685
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RCRA 8-Hour Compliance

Course Outline

Prerequisites: This course shall have no formal pre-requisite.

Course Length: 8 hours – Course length shall vary depending on the number of delegates. Total course time includes breaks.

Class Size: The maximum number of delegates that may be trained and tested per instructor shall be thirty-five (35) in the classroom session.

Course Objective

- To provide delegates an overview of RCRA that can be used to perform their duties in compliance with the regulations.
- To inform delegates about the hazards associated with the management of hazardous waste.
- To prepare delegates to prevent injury or incident using hazard communication, personal protection equipment, and safe work procedures.
- To understand hazardous waste management procedures, including complying with accumulation and storage requirements.
- To provide delegates with techniques to respond effectively to hazardous waste emergencies in the workplace.

Course Design

-) Power Point© / Lecture / Audio Video / Visual Aids

Successful Course Completion

-) Requires a minimum score of 75% or better.
-) Grades shall be calculated by dividing the number of questions answered correctly by the total number of exam questions.
-) Delegates will have no more than thirty (30) minutes to complete the exam.

Course Content Summary

-) Classroom

Breaks: 10 minutes (approximately every hour)

Lunch: 1 hour



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Course Outline

About HAZMAT

-) Hazardous Material Transportation Act (HMTA)
-) Hazardous Material Regulations
-) Enforcement Authorities
-) Penalties
-) Employee Training Requirements
-) Administrative Training Requirements
-) HAZMAT Definitions
 - o Hazardous Material
 - o HAZMAT Employee
 - o Cycle of Transportation
 - o Shipper
 - o Hazardous Substance
 - o Reportable Quantity (RQ)
 - o Marine Pollutant
-) Hazard Classes
 - o Class 1 – Explosives
 - o Class 2 – Compressed Gases
 - o Class 3 – Flammable Liquids
 - o Class 4 – Flammable Solids
 - o Class 5 – Oxidizers and Organic Peroxides
 - o Class 6 – Poisonous and Infectious Materials
 - o Class 7 – Radioactive Materials
 - o Class 8 – Corrosive Materials
 - o Class 9 – Miscellaneous Hazardous Materials
-) Five Steps to HAZMAT Compliance

Step 1 – Classification

-) Obtain Shipping Description
-) Review the Hazardous Material Table
 - o Column 2 – Material Description, Proper Shipping Name
 - o Column 3 – Hazard Class/Division
 - o Column 4 – Identification Numbers

Step 2 – Packaging

-) General Packaging Requirements
-) Review Hazardous Material Table



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- Column 5 – Packing Groups
 - PG I, II, III
- Column 7 – Special Provisions
- Column 8 – Packaging Requirements
-) UN Specification Codes
 - Example on Box and Drum
-) Performance Orientation Packaging Example

Step 3 – Marking/Labeling

-) Marking Requirements
-) Labeling Requirements
-) Marking/Label Sizes
-) Marking/Label Examples
-) Additional Labels on Package
-) Additional Container Markings

Step 4 – Shipping Papers

-) General Requirements
-) Shipping Paper Examples
-) Additional Requirements
-) Shipper's Certification
-) Hazardous/Non-Hazardous Materials
-) Accessibility
-) Retention
-) Emergency Response Information
-) Emergency Response Guidebook
 - Define colored sections

Step 5 – Placarding

-) General Requirements
-) Placard Examples
 - Required Size
-) Placard Determination
 - Non-Bulk
 - Bulk
-) Placarding Empty or Unpurged Tanks
-) Placard Location/Visibility
-) Placard Flow Chart



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HAZMAT Safety

-) Loading/Unloading HAZMAT
-) Review HAZMAT Segregation Charts
-) Carrier Requirements
 - o Highway
 - o Air
 - o Rail
 - o Water
-) Vessel Segregation Chart

HAZMAT Security Awareness

-) Training Requirements
-) Awareness
-) Recognition
-) Potential Targets
-) Security Risks
-) Security Checklist
-) Security Plans

Resource Conservation and Recovery Act

-) Overview of RCRA
-) Goals of RCRA
-) The 3 Elements
 - o The Act
 - o The Regulations
 - o Guidance and Policies
-) Related Acts and Regulations
 - o CERCLA
 - o Clean Air Act
 - o Clean Water Act
 - o SARA
 - o EPCRA
 - o HAZWOPER
-) Subtitles and their Provisions

Identification and Listing of Hazardous Waste

-) Terms



- Solid Waste
- Hazardous Waste
- Exclusions
- Cradle-to-Grave
- Generators
- Transporters
- Treatment, Storage, and Disposal Facilities (TSDF)

) Identification Criteria

- Is the material in question a solid waste?
- Is the material excluded from the definition of solid waste or hazardous waste?
- Is the waste a listed or characteristic hazardous waste?
 - Toxic listed waste
 - Acute hazardous waste
 - Characteristic hazardous waste
- Identification Criteria: Listed Wastes
 - F list
 - K list
 - P and U lists
- Is the waste delisted?

) Characteristics of Hazardous Wastes

- Ignitability
- Corrosivity
- Reactivity
- Toxicity

) Special Regulatory Conventions

) Mixed Wastes

Hazardous Waste Generators

-) Three categories - based on the amount of hazardous waste generated per calendar month
-) LQGs and SQGs Requirements
-) VSQG/CESQGs Requirements
-) Importing/Exporting
-) Farmer exclusions and Academic entities

Transporters of Hazardous Waste

-) Definitions
 - Regulated transporter



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- Transfer Facilities
-) The RCRA Subtitle C regulation requirements
-) EPA Identification Number
-) The Manifest
 - Required Forms
 - General Requirements
 - Required Information on Completed Forms
 - Using the Manifest System
 - The Electronic Manifest
 - Rejected Waste
 - Manifest Requirements for Water and Rail Transporters
 - Special Exemptions for Resource Recovery and Recycling
-) Handling Hazardous Waste Discharge
 - Must be prepared for an accident
 - Notification and diking
 - Contacting NRC
 - Role of NRC and local authorities
-) Additional Regulatory Requirements
 - Transporters becoming storage facilities
 - Transporters becoming generators

TSD Facilities

-) Overview
-) Definitions
 - Treatment
 - Storage
 - Disposal
 - Disposal facilities
 - Permitted facilities
 - Interim status facilities
-) Operation and Management Standards
 - Compliance with:
-) Standards for the variety of TSDF units
-) Closure
 - Requirements
 - Post closure/Final disposal
-) Financial assurance
 - Closure
 - Liability



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-) Ground Water and Air Resources
 - o Ground Water Protection
 - o Air Resources Protection

Land Disposal Restrictions

-) Overview
-) Components
 - o Disposal Prohibition
 - o Dilution Prohibition
 - o Storage Prohibition

Hazardous Waste Combustion

-) Overview
-) Regulations

Hazardous Waste Permit Program

-) Permitting
-) Permitting Scope
-) Permitting Process
-) Various Types of Permits
 - o Interim Status
 - o Special Provisions
 - o Standardized Permit

State Hazardous Waste Programs

-) Overview
 - o State Authorization

Specific Hazardous Wastes and Facilities

-) Part 266

Universal Waste Management

-) What is Universal Waste?
-) Universal Waste Program

Used Oil

-) Overview
-) Regulation
 - o Recycling Presumption
-) Identification
-) Used Oil as a Hazardous Waste
 - o Rebuttable Presumption



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-) Storage Requirements
-) Burning Restrictions

Underground Storage Tanks

-) Overview
-) Regulatory Requirements

Training Center Provided Material

-) Course Materials

Delegate Requirements

-) None

Reference Material / Documents

Title 40 of the CFR, Parts 239-282

DOT 49 CFR 171-180