



RCRA-C Compliance

Information for  
Pharmacies and Others

## Facility Employee Training Plans

This outline provides **general** information on the development and implementation of a facility training plan for facilities subject to the RCRA-C hazardous waste generator regulations (not including TSDFs). A compliance training plan is intended to help employees understand what is necessary to keep a facility in compliance. It is not the same as the training required by the regulations for emergency response and other functions. It can be used to develop facility-specific plans tailored and scaled to specific facilities. Developing and implementing training plans is recommended for all facilities, whether required by the regulations or not. This outline is not meant to address every compliance scenario that could occur. Users of this outline are responsible for ensuring that all facility-specific issues are addressed.

1. **List Hazardous Waste Compliance Duties**
  - Based upon Facility Compliance Plan, list all duties needed to maintain compliance.
2. **Assign Compliance Duties to Job Titles**
  - Ensure that each compliance duty is attached to specific facility job titles.
  - Establish a “Compliance Officer” title.
3. **Identify Employees Assigned to each Compliance Job Title**
  - Ensure that specific individuals are assigned to each compliance job title, including Compliance Officer.
4. **Determine Training Content**
  - Base content upon Facility Compliance Plan and Compliance Duties.
  - Develop “How To” guides on issues applicable to the company/store (e.g., how to identify hazardous wastes, determine generation rates, etc.)
  - Determine training needed for each job title.
  - Include special topics as needed (e.g., RCRA overview, procedures for working with hired contractors and transporters, reverse distribution/logistics, universal wastes, incompatible wastes, common violations, land disposal restrictions, consequences of non-compliance, etc.).
  - Develop training materials (documents, checklists, video, presentations, etc.).
  - Identify and train the trainer or identify an outside trainer that will be used.
  - Identify additional training needed for facility Compliance Officer.

5. **Determine Best Training Methods for Each Job Title**
  - Classroom training.
  - On-the-job training.
  - Self-led training.
  - Combinations of methods.
6. **Implement Training**
  - Establish deadlines for completion of training for each employee.
  - Complete training.
  - Evaluate effectiveness of training.
7. **Conduct Refresher Training as Needed**
  - Establish content, methods and frequency (at least annually).