

PERMIT ATTACHMENT 5

PERSONNEL TRAINING

I. PERSONNEL TRAINING

The Facility shall conduct comprehensive training that is designed to equip The Facility employees with the skills necessary to perform their duties effectively and safely.

A. General Provisions

Personnel will be trained on hazardous waste management procedures and elements of the Contingency Plan to ensure the facility is operated safely and emergencies are effectively alleviated. The Facility employees shall be trained in the positions in which they are working. Documentation of training provided and training reviews will be a part of the operating record.

The Facility shall maintain on file at the facility a detailed written personnel training program, a written job description for each current position; a current organization chart; and a record of individuals presently working in each position at The Facility. Job descriptions must include requisite skills, education or other qualifications, and duties of employees assigned to each position.

Objectives of the personnel training program will include:

1. Training each employee to properly accomplish their job duties; and
2. Ensuring all designated employees can effectively implement proper emergency procedures, should the need arise.

Primary elements of The Facility's personnel training are Formal Training, OJT and Annual Refresher Training.

B. Formal Training

All Facility personnel will receive formal training. The Facility will maintain on file documentation of all formal training completed by each individual. The formal training program consists of many different parts. Initial training for staff includes OSHA required HAZWOPER training; training in the use of personal protective equipment, training in facility operations including the contingency plan and site safety requirements and annual refresher training in HAZWOPER and the facility contingency plan.

Additional formal training is used for new job skills and for specific job tasks and activities. Formal training also includes job hazard analyses and job safety briefings, which are conducted prior to undertaking new or different facility operations. Additional formal training will be conducted as applicable.

These formal training courses take place in classroom settings, on computer or may be written training courses.

Emergency response team members, the emergency coordinator, and back-up emergency coordinators shall receive additional training as described in 29 CFR 1910.120 Subpart L. This formal training will also be documented on an affidavit or with certificates.

C. On-the-Job Training (OJT)

The Facility shall conduct OJT to familiarize new employees and employees transferring into new positions with their duties including hazards associated with the job; personal protective equipment required, general training in emergency procedures; and environmental protection. The Facility shall maintain on file at the facility documentation of OJT received by personnel.

OJT training will be based on tasks and managed through a training roster or comparable mechanism. Trainee proficiency will be authenticated by the OJT trainer (senior manager, area supervisor, or foreman) via an operating test (performance/ written), verbal test, or other performance demonstration. Final assignment will be contingent upon satisfactory completion of OJT.

OJT shall be conducted by a line-supervisor or an experienced co-worker in the same job classification.

D. Annual Refresher Training

The Facility shall provide annual refresher training to employees within 400 days from the date of his/her initial training or his/her last annual refresher training. This training will provide a review and update of the formal training lessons as they pertain to individual employee job descriptions. This training may take the form of monthly training sessions.

E. Documentation

Written documentation that training required by this Permit has been given to and completed by the appropriate personnel shall be maintained until closure of the Facility for current employees and for 3 years from the date the employee last worked at the Facility for former employees.

F. Review of Training Plan

The Health and Safety Administrator and the Manager of Environmental Affairs and Regulatory Compliance, along with appropriate facility management personnel will, at a minimum, annually review personnel training plan requirements and modify the plan as necessary. Records of the review shall specify the contents of each evaluation including such topics as:

1. Changes in types or quantities of wastes accepted and receipt, treatment, storage or disposal processes;
2. Changes or revisions to permit requirements, emergency coordinators and general operations;
3. Any incident requiring implementation of the contingency plan, notification requirements.

After the annual training program review, required modifications will be made to each affected training segment and will be incorporated into the subsequent training cycle. Every 6 months, The Facility will review each employee's personnel file against that person's job description and training requirements, to verify that the frequency and type of training required for that job is being provided.

OUTLINE OF FORMAL TRAINING MODULES

Module No.	Subject and Description
F1	Reserved
F2	Reserved
SS 2015 SS 2016	<u>Overview Site Safety</u> : Discussion of safety and health procedures that enhance personnel safety. Safety procedures for Clean Harbors Deer Trail Hazardous Waste Treatment Storage and Disposal Facility (identified as the Facility throughout the rest of this document) will be addressed
SS 2025 SS2029	<u>Individual Contingency Plan</u> : Contingency training topics include the general plan; emergency equipment by type including communication, fire/explosion control, spill control, safety, and first aid location, use and care; emergency procedures, emergency coordinators, and emergency response agencies; emergency response communication, assembly, job duties for special teams, evacuation, and reporting; emergency recovery, disposal, decontamination, and shut down or resumption of normal operations.
ET 3050	<u>Regulatory Requirement</u> : A review of state and federal RCRA regulations; Facility requirements; transporter and generator requirements. Essentials of the Facility's RCRA TSD Permit that apply to an employee's job function, is presented. Clean Harbors Deer Trail Policies and Procedures to comply with these regulations and permit requirements are also discussed.
HS 1041	<u>Hazard Communication</u> : This module satisfies requirements of 29 CFR 1910.1200. Information addressed includes MSDSs; chemical labeling, hazards, and inventory; hazard recognition; etc. Additional hazard communication training is provided when new hazardous chemicals and/or materials are added to the Facility inventory.
HS 1045	<u>Introduction to Personal Protective Equipment (PPE)</u> : The various types of PPE that are available and the locations where specific PPE is required at the Facility is presented.
HS 1043	<u>Introduction to the Respiratory Protection</u> : This module discusses requirements of 29 CFR 1910.134 and how Highway 36 complies with them. Selection, use, limitations, and storage of respiratory protective equipment are discussed. The module includes a fit test on his/her assigned respirator and having the employee demonstrate they know how to check for leaks.
HS 6071	<u>Advanced Respirator Protection</u> : Proper maintenance of respirators and SCBAs (inspection, cleaning, repair, and storage) is discussed in this module.
HS 6020 HS 6021 HS 6122	<u>Introduction to Use and Maintenance of Fire Protection Equipment</u> : Employees are trained to properly use the portable, dry chemical fire extinguishers located in all buildings at the Facility.
F11	Reserved

HC 1080	<p><u>First Aid</u>: Personnel are trained on basic first aid procedures by instructors qualified through the American Red Cross (ARC) or the American Heart Association (AHA). Possession of a current Emergency Medical Technician (EMT) Certificate satisfies this requirement.</p> <p><u>CPR</u>: Personnel are trained on cardio-pulmonary resuscitation (CPR) by instructors qualified through the ARC or the AHA. Possession of a current EMT Certificate satisfies this requirement.</p>
HS 1044 HS 6010	<p><u>Heat/Cold Stress</u>: Information and procedures to manage heat and cold stress in the work environment is presented.</p>
HS 1045	<p><u>Hearing Conservation</u>: Instruction meeting the requirements of 29 CFR 1910.95 is presented including the effects of noise on hearing, purpose of hearing protectors, and other procedures and controls.</p>
SS 1105/1106 SS 1110/1111 SS 1115/1116 SS 1120/1121 SS 1125/1126 SS 1130/1131 SS 1135/1136 SS 1145/1146 SS 1150/1151	<p><u>Heavy Equipment Operator Safety Training</u>: A discussion of proper procedures to operate equipment on-site, including inspecting vehicles, traffic patterns and control devices on-site, and equipment malfunctions</p>
SS 1140/1141 HS 4020	<p><u>Skid Steer Loader, Fork Lift, Drum Lift</u>: Instruction of employees on the safe use and maintenance of site-specific material hauling equipment.</p>
HS 5205	<p><u>Basic Chemical Concepts</u>: Instruction on the general principles of chemistry that make substances hazardous, or flammable, or reactive. Characteristics of a fire and handling procedures for flammable materials are discussed as are procedures for proper chemical handling and handling of reactive materials. Includes a brief discussion of chemical reactions and factors which influence reaction rates, such as temperature, physical state, exposed surface area, catalysts and spontaneous reactions. Certain chemical groups which undergo reactions are identified.</p>
HS 1044 HS 6500 HS 6600 HS 6700	<p><u>Confined Space Entry</u>: A discussion to accomplish the requirements of 29 CFR 1910.146 and the Facility's Health and Safety Program and includes atmospheric and work place monitoring, PPE, permit procedures, "Buddy" or standby observer system, and communications.</p>

HS 4055 HS 4080	<u>Lock out/Tag out Procedure</u> : A discussion to accomplish the requirements of 29 CFR 1910.147 and the Facility Health and Safety Program.
HS 5020	<u>Asbestos Training</u> : Procedures and specific job task requirements for the safe handling of asbestos-containing materials is presented.
HS 4090 HS 4095	<u>Hot Work Procedures</u> : A presentation that fulfills the requirements of 29 CFR 1910.252 and the Facility Health and Safety Program.
HS 4010	<u>Electrical Grounding and Bonding</u> : Specific job task requirements to control the effect of static electricity during flammable liquid storage and transfer is presented.
HS 1048	<u>Safe Drum Handling</u> : Employees involved in drum storage and transfer are instructed in correct and safe handling procedures of them.
ET 2002	<u>Placards, Labels, and Manifests</u> : Information is presented on the manifest system, how to complete a manifest, and distribution of a manifest to generators, transporters, disposers and regulatory agencies. Training on documents for the Facility as a generator will be presented. Discusses the DOT system for identifying hazardous materials and vehicles which transport them.
No Course Code	<u>Train the Trainer</u> : Methods and techniques for preparing and presenting formal training activities are taught.
F29	Reserved
HS 1047	<u>Emergency Response</u> : Initial training consists of classroom and field instruction to prepare employees to respond efficiently as team members to fires, explosions, and spills of hazardous material. Training includes proficiency training at first responder awareness level, first responder operations level, and hazardous material technician level.
HS 2100	<u>OSHA-24</u> : This 24-hour module satisfies the requirements of 29 CFR 1910.120 and will be provided to employees as required.
SS 2005	<u>Annual Site Specific Refresher Training</u> : This annual refresher training reviews each employee's pertinent formal training modules.
HS 1047	<u>Advanced Use of Fire Protection and Spill Response Equipment</u> : Personnel are trained to properly use all fire protection and spill response equipment throughout the site. Personnel are also instructed on the types of fire and spills envisioned and applicable response equipment. Hands-on fire response demonstrations or critiques of actual spills or fire incidents are conducted with Emergency Response Team Members.
HS 1041 thru HS 1048	<u>OSHA-8 Hour Update</u> : This 8-hour module satisfies the requirements of 29 CFR 1910.120 for an annual review. It is also provides familiarization instruction for employees who are not involved in waste management processes.

OUTLINE OF ON-THE-JOB TRAINING (OJT) TOPICS

<u>Module No.</u>	<u>Subject and Description</u>
J1	Proper sampling methods In-Accordance-With (IAW) EPA SW-846 and the Waste Analysis Plan, the Groundwater Sampling and Analysis Plan, National Institute for Occupational Safety and Health (NIOSH) methods, or 29 CFR 1910.
J2	Proper analytical methods IAW EPA SW-846, the Waste Analysis Plan, the Groundwater Sampling and Analysis Plan, or NIOSH analytical methods.
J3	Calibration of laboratory, environmental monitoring equipment, or industrial hygiene monitoring equipment.
J4	Review of waste management documents as a TSD and as a generator. Review of incident investigation procedures and documents.
J5	Purpose, operation, and limitations of monitoring equipment and mechanisms (i.e., sumps, trenches, high level alarms, leak detection systems, wind gauge, rain gauge, flammable gas detectors, organic vapor analyzers, oxygen meters, etc.).
J6	Waste inspection, sampling, and verification procedures IAW the Waste Analysis Plan.
J7	Proper use of the on-site inspection checklist and Facility inspection procedures.
J8	Segregation of incompatible materials.
J9	Use of portable, hand-held, fire extinguishers.
J10	Safe and proper use of heavy equipment (trucks >5 ton, road graders, crawler tractors, track hoes, scoop loaders, etc).
J11	Safe and proper use of power tools and power equipment.
J12	Safe and proper use of hand tools with emphasis on safe use in hazardous areas.
J13	Safe handling of drums/containers.
J14	Proper grounding of electrical equipment, tools, and containers. Proper use of ground-fault interrupters (GFIs).
J15	Safe manual lifting, ergonomics, and appropriate work station design.
J16	Safe lifting with drum handling equipment.
J17	Loading/unloading waste into treatment basins, truck/container purging, loading wastes into trucks inside the treatment building, filling and emptying the vacuum truck, and depositing waste into the secure disposal cell.
J18	Operation of the truck wash.
J19	Use of emergency spill response equipment.

- J20 Fire fighting procedures.
- J21 Safe and proper use of Personal Protective Equipment (PPE).
- J22 Use of SCBAs, maintenance, cleaning.
- J23 Use of foam, water, and other fire extinguishing systems.
- J24 Hand signals for emergency communication, when personnel are in Level A, B, or C protective equipment.
- J25 Use of communications equipment.
- J26 Response to emergencies involving spills, fires, and other incidents that compel implementation of the Contingency Plan to include proper waste sampling and verification procedures as specified in the Waste Analysis Plan.
- J27 Purpose, location, operation, and limitations of treatment building, container storage area, oil and solvent tank, and secure disposal cell monitoring and emergency cut-off systems.
- J28 Inspection of waste containers and waste transfer tickets prior to discharging waste into treatment mixing basins.
- J29 Purpose, operation, and limitations of emergency, monitoring, alarm, and communication systems and equipment.
- J30 Purpose, operation, and limitations of emergency systems, waste feed cut-off systems, and emergency shut down procedures for all operable units.
- J31 General Safety Meetings: Procedures for maintaining the health and safety of workers on the Facility will be discussed. Provides a forum for training on subjects that include safe handling and proper PPE for specific waste streams, requirements for atypical shipments, and reviewing policies and procedures.