

ATTACHMENT 3
PERSONNEL TRAINING

Annual On-Going Up-Date Training Outline

- I. Introduction to Hazardous Waste
 - A. Major Laws
 - B. Government Publications (29, 40, 49 CFR)
 - C. EPA, DOT, OSHA Interface

- II. Hazardous Waste Determination
 - A. R315-261

- III. Hazardous Waste Accumulation Areas
 - A. R315-262

- IV. Container Management
 - A. R315-264-170

- V. DOT Shipping Criteria
 - A. 49 CFR 172.101

- VI. Reportable Quantities
 - A. 49 CFR 172.101 Appendix

- VII. Implementation of the Contingency Plan

Training is held throughout the year for all TSDF operators that handle or are expected to handle hazardous waste.

OUTLINE FOR THE TRAINING OF PERSONNEL WHO GENERATE, PICKUP/TRANSPORT/DISPOSE OF, AND MANAGE HAZARDOUS WASTE

INTRODUCTION

This training will teach employees and contractors (if they work with hazardous waste) to properly handle, pickup/transport/dispose of, and manage hazardous waste. It will enable employees to safely handle hazardous waste and ensure that facility personnel are able to respond effectively to emergencies in order to protect human health and the environment. It will also ensure that the Company is in compliance with all applicable laws and regulations as they pertain to training.

AUDIENCE

The audience is made up of three major groups. 1) Those individuals who generate hazardous waste. 2) Personnel who pickup, transport, and dispose of hazardous waste. 3) The technical people who manage hazardous waste operations at the Company.

CONTENT OF THE PROGRAM:
(The employee will be able to:)

REQUIRED FOR
GROUP(s)

| | | |
|-----|--|-------|
| 1) | Define hazardous waste terms | 1,2,3 |
| 2) | Understand the importance of and follow procedures | 1,2,3 |
| 3) | List characteristics of hazardous waste | 1,2,3 |
| 4) | List various hazardous waste materials | 1,2,3 |
| 5) | List examples of and consequences of improper disposal | 1,2,3 |
| 6) | Comply with Federal and State Laws | 1,2,3 |
| 7) | Comply with Company | 1,2,3 |
| 8) | List the major functions performed in their work area as related to hazardous waste | 1,2,3 |
| 9) | List their job responsibilities as related to hazardous waste | 1,2,3 |
| 10) | Use resources and references related to hazardous waste | 1,2,3 |
| 11) | Operate various hazardous waste handling equipment | 1,2,3 |
| 12) | Proper use of safety equipment | 1,2,3 |
| 13) | Avoid shortcuts when handling hazardous waste | 1,2,3 |
| 14) | Proper use of monitoring equipment | 2,3 |
| 15) | Identify hazardous waste | 1,2,3 |
| 16) | Segregate incompatible materials | 1,2,3 |
| 17) | Proper use of package materials | 1,2,3 |
| 18) | Label materials | 1,2,3 |
| 19) | Inspection requirements for TSDFs | 2,3 |
| 20) | Requirements for the pickup of hazardous waste | 2,3 |
| 21) | Requirements for the transport of hazardous waste | 2,3 |
| 22) | Dispose of hazardous waste in a timely manner | 1,2 |
| 23) | Respond properly under emergency conditions | 1,2,3 |
| 24) | Procedures to cleanup spills | 1,2,3 |
| 25) | Understand the importance of properly handling and disposing of hazardous waste to protect employees and the environment | 1,2,3 |
| 26) | Understand the basis for these requirements | 1,2,3 |

APPROACH

The training is divided into the following three categories:

1. Orientation training. Item numbers 1, 2, 3, 4, and 5 and parts of number 6, 7, 8, and 9 listed above will be covered in orientation training. These items will also be reinforced on the job.
2. Formal, Structured on-the-job-training. Parts of items 6, 7, 8, and 9 and items 10 through 26 will be covered on the job.
3. Specialty training. This is classroom instruction indirectly related to hazardous waste operations. Some of these courses are: Asbestos, Propellant Material Handling, Environmental awareness and Hazardous Waste Disposal and Hazardous Waste for Dock Coordinators. All training must be recorded.

Employees will not be allowed to handle hazardous waste unsupervised until they have successfully completed the training program. Training will be completed within six months of the employee's hire date. There will also be annual refresher training (similar to new hire training) conducted for all employees affected by the program to assure they are always adequately trained. This training will consist of, at a minimum, a review of their initial training in both contingency procedures and the hazardous waste management procedures relevant to the positions in which they are employed. All training will be evaluated to ensure compliance and safety. Performance will be measured against specific standards set out at the beginning of the program.

TRAINING DOCUMENTATION

The following documents and records will be maintained at the facility and made available for review by DWMRC upon request:

1. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
2. A written job description for each position listed under number one above. The description will include the requisite skill, education, or other qualifications and duties of the employees assigned to each position;
3. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position under number one above.
4. Records that document that the required training or job experience has been given to, and completed by the appropriate personnel;

Records of the training will be kept until closure of the facility or for three years after the employee leaves the Company.

CONCLUSION

The training program presented in this outline is made up of a number of different components, all of which work together and supplement each other. All of these components are under the guidance, supervision, and management of a combination of professional trainers, line supervision, and hazardous waste management professionals. The trainers are skilled in current instructional technologies, have appropriate educational backgrounds, and the work experience to qualify them for this assignment. Much of the training is already being done in one form or another. Throughout its life, the program will continue to be evaluated and revised. This will ensure that it is continually improved, current, and in compliance. The program will meet the needs of the employees, the environment, the law, and the Company.