

ATTACHMENT II-4

PERSONNEL TRAINING PLAN

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PERSONNEL TRAINING PLAN

1.0 INTRODUCTION

The Clean Harbors Grassy Mountain facility (CHGM) training program shall enable CHGM personnel to understand the processes and materials with which they are working, and the safety and health hazards associated with those processes and materials. The training program shall also instruct CHGM personnel in the proper procedures for preventing and responding effectively to emergency situations, and where appropriate, the training program shall provide knowledge for using, inspecting, repairing, and replacing facility emergency equipment. Regular instruction in safety shall be provided through safety meetings and drills. The objective of the training program is to develop personnel trained to perform their specific job functions in an efficient, safe, and proper manner. This plan describes training that is required under the CHGM Resource Conservation and Recovery Act (RCRA) permit and U.S. Department of Transportation (USDOT) training necessary for manifesting waste off-site. Other training is provided (e.g., Occupational Safety and Health Administration (OSHA)) that is not described by this plan. However, OSHA or USDOT classes can fulfill specific requirements of this plan.

2.0 OVERVIEW OF RCRA TRAINING PROGRAM

CHGM personnel shall receive general and job position specific hazardous waste management training prior to working unsupervised in any job position that requires managing hazardous waste. This training shall be completed within six months of employment. Additional job specific training shall be given within six months of reassignment. CHGM personnel participate in an annual review of general training.

2.1 RCRA PERSONNEL TRAINING REQUIREMENTS

The requirements for training are contained in R315-264-16 of the Utah Administrative Code (UAC). Facility personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of UAC R315-264.

The training program is directed by a person trained in hazardous waste management procedures in accordance with UAC R315-264-16(a)(2) and is designed to ensure that facility personnel can respond effectively to emergencies in accordance with UAC R315-264-16(a)(3).

The general training matrix for CHGM personnel is provided in Appendix 1 to this Personnel Training Plan. CHGM shall provide annual refresher training consisting of a review of the appropriate materials covered by the initial training program.

2.2 DEFINITION OF "FACILITY PERSONNEL"

The term "facility personnel" shall apply to persons who are employed on-site for the purpose of managing (e.g., waste sampling, treating, or disposing, etc.) hazardous waste and are assigned to CHGM. Personnel from other divisions of Clean Harbors and consulting engineers who are not involved in the management of hazardous wastes at the site are not covered by this training program. Personnel from off-site who are involved in

the management of hazardous waste at the site shall be trained in accordance with this plan unless certification of appropriate training is obtained from the contractor or the employee. The certification shall be incorporated into the employee's training record and be available upon request.

2.3 TRAINING RECORDS

CHGM shall maintain training records for all facility personnel. These include the job title of the position; a job description detailing the requisite skill, education, and other qualifications; and a list of both general and job position specific training for an employee filling that position. CHGM shall maintain documentation that the employee has received the training and has the job experience. Documentation shall consist of training course attendance sheets or an electronic certificate of completion for the class. CHGM maintains a summary of required training that each employee completes and shall make the summary available to the Director of the Division of Waste Management and Radiation Control (Director) upon request. CHGM shall review each employee's training at least annually and document it in the individual's training record.

CHGM shall maintain a list of waste management job positions at CHGM and the name of the employee(s) filling each job at the facility.

Training records for current personnel shall be kept until closure of CHGM. Training records for former employees shall be kept for at least three years from the date the employee last worked at the facility, except that personnel training records can accompany personnel transferred within the company.

CHGM shall verify training records for non-facility personnel and make them available to the Director upon request.

2.4 OFF-SITE TRAINING

Off-site training is available in addition to on-site training and can serve to fulfill CHGM's training requirements in some circumstances.

In some years, a person may attend an off-site seminar or training course that contains equivalent information contained in one or more of the on-site training sessions. This training must be documented by the trainee (self-certification) and may be used for fulfillment of the requirement for annual refresher training. If an employee requires annual job training in addition to the off-site refresher, Clean Harbors shall still provide it.

Self-documentation becomes necessary when employees attend seminars that are not site sponsored and when standard methods of attendance verification are not available. Self-documentation can include submission of a signed and dated certificate offered by the sponsor of the off-site seminar. In cases where a certificate is not offered, the employee shall submit a detailed outline of the seminar that the employee has signed and dated. Certificates and outlines shall be kept in the employee's training record. The CHGM General Manager shall verify that the documentation submitted from the seminar meets the requirements of self-documentation and that the topics addressed by the

seminar or class meet the requirements of CHGM's Personnel Training Plan. The CHGM General Manager must approve the self-documentation.

In summary, non-Clean Harbors sponsored training can be utilized and documented if it meets or surpasses the training requirements contained in this plan. The training, if it is to be used as fulfillment of the requirements contained herein, shall be documented, and placed in the training record following verification that the class has met the requirements of the Personnel Training Plan of the facility. CHGM shall document this verification in the employees' training record.

2.5 CLEAN HARBORS-SPONSORED TRAINING COURSES

CHGM can elect to sponsor and administer portions or all of the Training Program. The descriptions listed in Section 3.0 of this Plan are typical of the basic concepts administered through the Training Program, regardless of whether they are conducted by CHGM or others. These concepts can be taught as an entire training module, as part of a single module or as part of several modules. A list of the modules taught as part of the Training Program is included in Appendix 1.

2.6 INSTRUCTOR QUALIFICATION

Instructors must demonstrate that they are qualified to teach a module by presentation of academic credentials, a resume detailing actual past work experience, or other equivalent documents that are specific for that module. Training courses presented by non-Clean Harbors groups shall be considered for appropriateness and applicability and only deemed acceptable if the module meets the objective of the CHGM Personnel Training Plan.

CHGM shall incorporate the credentials of all instructors into the operating record.

3.0 CONTENT OF TRAINING COURSE MODULES

All CHGM employees who actively engage in the management of hazardous waste shall have completed, at a minimum, the OSHA 24-hour initial training course. Thereafter, the employees who fill these positions shall receive the OSHA 8-hour refresher.

All personnel, upon initial employment, shall be introduced to the company philosophy and method of operation as well as specific rules and regulations. This material shall be covered in the company overview module, which is not part of the OSHA training modules. Also included in the company overview module shall be a facility description, operations overview, and basic office procedures.

3.1 8-HOUR REFRESHER (29 CFR 1910.120) MONTHLY MODULE TRAINING COURSES

3.1.1 Globally Harmonized System (GHS) for Hazard Communications

Training related to chemicals and toxicology shall provide a basic understanding of relevant terminology and the inherent properties of the waste types managed on-site. Training shall emphasize precautions to be taken in handling hazardous wastes and the reasoning for such measures. Specific consideration shall be given

to the procedures and practices governing the mixing of materials and prohibiting the mixing of incompatible materials which can result in undesired events.

Discussion of toxicology and inherent hazards shall encompass the types of materials treated, stored, and disposed of on-site.

3.1.2 Medical Surveillance, Hearing Conservation & Bloodborne Pathogens

Medical surveillance for applicable employees is a requirement of OSHA, 29 C.F.R. § 1910.120. CHGM provides medical surveillance to employees that work in potentially hazardous environments. Training is provided to explain the CHGM medical surveillance program, which includes hearing conservation and monitoring.

Bloodborne Pathogen Guidelines are reviewed for the safety of all CHGM's employees. The guidelines are designed to prevent accidents, injuries or illness caused by unintentional exposure to blood, blood products, or other potentially infectious materials. The review of these procedures will help prevent workers from accidentally being exposed to illness and possible life-threatening situations.

3.1.3 Respiratory Protection

For protection in atmospheres known or suspected to contain toxic substances, certain personnel shall be instructed in the care and use of respiratory protection equipment. Training stresses proper use and fit and procedures for basic inspection and maintenance. Respiratory protection procedures shall be reviewed periodically and assessed for appropriateness. For personnel who utilize a respirator as part of their job function, a fit test shall be provided to the employee to verify that the respirator is adequately protecting the employee.

Trained personnel shall perform all repairs and annual inspections of equipment when and where required. Respiratory protection training is covered by OSHA required training.

3.1.4 Confined Space & Heat Stress

Identifying the different types of heat stress and their warning signs and deciding what actions to take to alleviate heat stress are important aspects to providing for a safe work environment for employees. This training will identify factors that could lead to heat related illnesses and preventative measures.

This training allows employees to recognize the difference between permit required and non-permit confined spaces and identify the unacceptable conditions for entry into a confined space. Trainers shall teach lockout and tag out requirements and procedures in this module.

Employees will be trained in the responsibilities for each role in a confined space job.

3.1.5 PPE & Hearing Conservation

This module provides basic safety training in the selection, use, and care of personal protective equipment with emphasis on CHGM. The program focuses

on the OSHA requirements as well as the health and safety procedures for CHGM.

3.1.6 Decontamination

This module provides basic information on the importance of decontamination when working with hazardous chemicals. The program focuses on the OSHA requirements as well as the health and safety procedures for CHGM. The training will review the steps of defining, proper set up and procedures for decontamination.

3.1.7 Emergency Response

This module will ensure that employees are aware of the regulatory requirements for emergency response and to understand the CHGM policies and procedures for site safety and emergency response.

3.1.8 Drum and Material Handling

This module is designed to train employees how to determine what types of hazards may be in a container and understand the safe work practices for handling drums. Different methods for responding to leaking containers and when each is appropriate will also be identified. Instruction on sampling procedures and container tracking are also part of this module.

3.2 OTHER TRAINING TOPICS

3.2.1 Company Overview

All personnel, upon initial employment, shall be introduced to the company philosophy and method of operation as well as specific rules and regulations. This material shall be covered in the company overview module. Also included in the company overview module shall be a facility description, operations overview, and basic office procedures.

3.2.2 OSHA 24-Hour (initial)

The OSHA 24-Hour HAZWOPER training provides certification in accordance with 29 CFR Part 1910 for employees operating in waste management areas on the facility.

3.2.3 Operations Practices

All operators (e.g., those that work in the landfills, in the solidification/stabilization areas, at the drum dock, etc.) must be familiar with the operating practices for their respective units. This is accomplished by reviewing and understanding job specific Standard Operating Procedures (SOPs). Procedures and actions will be discussed, and actual drills may be performed in the field. Other personnel will be trained as needed through orientation or review of other relevant plans.

3.2.4 Contingency Plan

All personnel shall be required to understand the Contingency Plan to the degree that it affects them. The Contingency Plan covers response to spills, fires, releases, and other emergency situations. It also discusses casualty control, evacuation, and clean-up procedures. This area of training shall include instruction in the procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; the key parameters for automatic waste feed cut-off systems; emergency communications and alarm systems and signals; response to ground-water contamination incidents; and procedures to be followed in the event of a shutdown of operations, as applicable. The scope of this training varies with a person's job position.

Procedures and actions shall be discussed, and actual drills will be performed in the field. These periodic drills may simulate fire, explosion, or emission or discharge of hazardous materials. These periodic drills are conducted quarterly. A form is provided as part of the Site Inspection Plan (Attachment II-3) to document the annual drill.

3.2.5 Respiratory Protection

For protection in atmospheres known or suspected to contain toxic substances, certain personnel shall be instructed in the care and use of respiratory protection equipment. Training stresses proper use and fit and procedures for basic inspection and maintenance. Respiratory protection procedures shall be reviewed periodically and assessed for appropriateness. For personnel who utilize a respirator as part of their job function, a fit test shall be provided to the employee to verify that the respirator is adequately protecting the employee.

Trained personnel shall perform all repairs and annual inspections of equipment when and where required. Respiratory protection training is covered by OSHA required training.

3.2.6 Annual RCRA

The annual RCRA Hazardous Waste Management training includes review of the permit conditions and requirements for operation of the facility. The training also familiarizes all employees with the different sections of the permit and where a copy of the permit is located. This training will prepare CHGM personnel to identify, store, and dispose of regulated hazardous wastes in compliance with RCRA regulations. This training will also teach CHGM personnel how to approach and manage hazardous waste from cradle-to-grave and comply with RCRA Land Disposal Restrictions.

3.2.7 DOT Training (3 years)

Training for the Department of Transportation hazardous materials regulations is conducted every three years for employees involved with the handling of hazardous materials. The training is conducted to maintain compliance with Title 49 of the CFR.

3.2.8 First Aid, CPR (2 years)

First aid training is required for all employees and is conducted every two (2) years. First aid basics, medical and injury emergency procedure instructions are provided as part of the training. CPR and AED instructional training is provided as part of this training.

3.2.9 SPCC Training (annual)

The Spill Prevention Control and Countermeasure Plan training explains the procedures for the prevention of and response to spills or releases on the facility. This training reviews, but is not limited to, spill prevention procedures, security, inspection, and records.

3.2.10 Health & Safety Admin Personnel

Administration personnel may accomplish Health and Safety training by participating in the monthly 8-hour OSHA refresher modules. The entire set of modules must be completed each year.

4.0 IMPLEMENTATION OF TRAINING PROGRAM

Upon employment or assignment to the facility, a training record shall be created for the employee as described in Section 2.3 of this plan. Reassigned employees at the facility shall have their records reviewed for training adequacy.

Modules typically consist of all, or portions of, the basic concepts described in Section 3 as well as appropriate procedures. For example, procedures related to managing hazardous waste drums at the drum dock would be included in the drum dock module. The employee can demonstrate understanding of the topics covered through written, oral, or practical exams. All exams, practical, written, and oral, and all training, including on-the-job training, shall be documented in the training record.

A matrix of minimum training requirements for each job position is in Appendix 1.

APPENDIX 1

GRASSY MOUNTAIN TRAINING MATRIX

Job Title	OSHA 24-Hour (initial)	OSHA 8 Hour Refresher (annual) ¹	Contingency Plan (annual)	Annual RCRA	DOT (every 3 years)	H&S Admin Personnel (annual)	Company Overview (annual)	First Aid, CPR (2yrs)	Operations Practices (annual)²	SPCC Training (annual)
Compliance Guard			X	X	X	X	X	X		
Compliance Manager	X	X	X	X	X		X	X		X
Equipment Operator	X	X	X	X			X	X	X	X
Facility Administrator			X	X	X	X	X	X		
Facility Coordinator			X	X	X	X	X	X		
Facility General Manager	X	X	X	X	X		X	X		X
Facility Maintenance Mechanic	X	X	X	X			X	X	X	X
Facility Maintenance Repair	X	X	X	X			X	X	X	X
Facility Technician	X	X	X	X			X	X	X	X
Facility Foreman	X	X	X	X	X		X	X	X	X
Lab Chemist	X	X	X	X	X		X	X		
Laboratory Manager/Supervisor	X	X	X	X	X		X	X		X

Job Title	OSHA 24-Hour (initial)	OSHA 8 Hour Refresher (annual) ¹	Contingency Plan (annual)	Annual RCRA	DOT (every 3 years)	H&S Admin Personnel (annual)	Company Overview (annual)	First Aid, CPR (2yrs)	Operations Practices (annual) ²	SPCC Training (annual)
Operations Manager	X	X	X	X	X		X	X	X	X
Quality Assurance Officer	X	X	X	X	X		X	X		X

Footnote 1: The following training topics are included in the annual OSHA 8-hour refresher course:

Globally Harmonized System (GHS), Bloodborne Pathogens Awareness and Medical Surveillance, Respiratory Protection, Confined Space Entry & Heat Stress, PPE & Hearing Conservation, Decontamination, Site Specific H&S Plan and Emergency Response, Drum and Container Handling.

Footnote 2: Mercury Consolidation is included in the annual Operations Practices training.