

ATTACHMENT II-4

PERSONNEL TRAINING PLAN

1. Overview and General Requirements.
 - a. This Attachment addresses the training requirements for hazardous waste management activities at the Facility including storage, treatment, and disposal.
 - b. Personnel training at the Facility is accomplished through the following training programs:
 - i. Initial Classroom Training
 - ii. Operational Training, as applicable to individual position requirements
 - iii. Annual Refresher Training
 - c. The Permittee shall perform an Annual Response Training Drill in accordance with Section 6.
 - d. This Attachment describes the training requirements for each of these training programs including the program content, frequency, and personnel applicability.
 - e. Initial Classroom Training and Annual Refresher Training programs shall involve training on the implementation of Attachment II-6, *Contingency Plan* in addition to other topics.
 - f. Training required by this Attachment shall be documented in the Operating Record. Records of completion of these training programs shall be kept at the site until closure of the Facility or for three years from the date the employee last worked at the site, whichever comes earlier.
 - g. Other associated documents regarding training, such as attendance rosters, tests, test scores, additional training, etc., are not required to be kept as part of this Permit.
 - h. The Permittee shall maintain the following documents and records at the Facility:
 - i. the job title for each position of facility supervisor and worker
 - ii. the name of the individual(s) filling each of the positions in Condition 1.h.i.

- iii. a written job description for each position in Condition 1.h.i, which shall include the requisite skill, education, or other qualifications, and duties of the position.
 - iv. a written description of the type and amount of Operational Training and Refresher Training that is required for each position in Condition 1.h.i.
2. Personnel Categories. For purposes of this Attachment, the following categories of personnel are defined:
- a. Hazardous Waste Worker. A hazardous waste worker is an individual who directly handles hazardous waste and is directly involved in hazardous waste management. Hazardous waste workers include those who:
 - i. sample incoming hazardous waste shipments
 - ii. analyze hazardous waste samples
 - iii. unload or transfer hazardous waste to or from containers, tanks, storage, treatment or disposal
 - iv. are involved in handling hazardous waste in treatment, encapsulation, or disposal activities, including surveying and placement of waste
 - v. conduct required inspections
 - vi. are involved in decontamination activities
 - vii. operate the thermal desorption system
 - b. Facility supervisor. A facility supervisor is an individual who reports to work at the site and who supervises hazardous waste workers.
 - c. Non-hazardous waste worker. Individuals who are not involved in handling hazardous waste. These individuals are not required to complete the training outlined in this Attachment. These individuals may enter secured areas occasionally or for routine review, orientation, support, or guidance purposes. The following are examples of such individuals:
 - i. corporate executive officer
 - ii. executive assistants, officers and managers
 - iii. engineers-not directly involved in waste management
 - iv. accountants
 - v. secretaries, receptionists, etc.

- vi. marketing personnel
 - vii. visitors and auditors
 - viii. contractors not involved in hazardous waste management
 - d. When non-hazardous waste workers visit the site, these personnel shall not be involved in the handling of hazardous waste unless they have completed the training outlined in this Attachment.
3. Initial Classroom Training
- a. Initial classroom training shall be given to facility workers and facility supervisors within 30 calendar days of being assigned work at the Mixed Waste Facility.
 - b. Hazardous waste workers and facility supervisors shall complete initial classroom training prior to working in hazardous waste handling positions.
 - i. Facility supervisors do not need initial classroom training to perform personnel management duties.
 - c. The initial classroom training shall include the initial classroom training topics listed in Table II-4-1.
 - d. An examination shall be given at the conclusion of the initial classroom training. Successful completion of the examination demonstrates that the individual has been successfully trained. Individuals who do not pass the examination shall review applicable topics with the appropriate Trainer or designee. Those individuals shall retake the examination and receive applicable topical reviews until the individual satisfactorily passes the examination. Alternatively, such individuals may be assigned to non-hazardous waste worker positions.
 - e. The initial classroom training shall be provided by an employee trained in hazardous waste management (Trainer).
 - f. The Permittee may use off-site contractors to provide hazardous waste management training. Off-site contractor-provided training may be counted towards the initial classroom training.
 - g. Applicable training may be credited toward the initial classroom training for individuals who meet the following requirements:
 - i. The individual worked at a permitted hazardous waste storage, treatment, or disposal facility for a period of at least two years; and
 - ii. The individual's experience at that facility was within the last two years

4. Operational Training

- a. Operational training shall include the topics listed in Table II-4-2, as applicable to individual position requirements.
- b. Documentation of operational training shall be in accordance with the Permittee's Qualification Training Program.
- c. Operational training shall be directed by an employee who has been trained in hazardous waste management operations.

5. Annual Refresher Training

- a. On an annual basis, following completion of initial classroom training, facility personnel who handle hazardous waste shall receive Annual Refresher Training.
- b. Annual refresher training shall be provided prior to the end of the month following the month in which the anniversary of completion of either the initial classroom training or a previous Annual refresher training occurs.
- c. If annual refresher training is not completed within the timeframe identified in Condition 5.b, the worker will not be permitted to handle hazardous waste until such time annual refresher training is completed.
- d. Annual refresher training shall include a review of the items listed in Table II-4-1.
- e. Annual refresher training may be provided in segments.

6. Annual Response Training Drill

- a. Each calendar year, an Annual response training drill shall be conducted which involves implementation of the *Contingency Plan*, Attachment II-6.
- b. This drill may be unannounced and shall be a "fire-drill"-type contingency exercise for all present personnel with the following agenda:
 - i. announcement of contingency
 - ii. implementation of the Contingency Plan
 - iii. response to incident
 - iv. resumption of normal operations
 - v. written evaluation of response

- c. Personnel present at the annual response drill shall be documented in the Operating Record.
7. Temporary and Contractor Employees
- a. Personnel working in hazardous waste management positions under contract for the Permittee or as temporary employees are subject to the same requirements as other personnel.
8. Classroom Training Requirements for Periodic Employees
- a. Hazardous waste workers shall remain current on training. Training is current to the following:
 - i. Initial classroom training remains in effect for employees who do not terminate employment and for three months following termination.
 - ii. Annual refresher training remains in effect for one year from completion.
 - A. Extensions may be granted on a case-by-case basis not to exceed 60 days. During this extension time, facility workers may handle hazardous waste.
 - B. If the one year limit is exceeded by 60 days, the facility worker will be required to repeat the initial classroom training.
9. Training Requirements for Qualified Thermal Desorption (TD) Operators
- a. TD Operator training shall be directed by recognized consultants or in-house specialists for the specific concepts being taught.
 - b. TD Operator training shall consist of the following courses (in addition to the initial classroom training):
 - i. introductory operation of the TD system
 - ii. TD system emergency response
 - iii. TD system on-the-job training
 - c. TD system on-the-job Training shall contain the following elements:
 - i. observation of the TD system operation under the direction of an employee designated lead plant operator, or higher.
 - ii. hands on operation under the direct supervision of an employee designated lead plant operator, or higher.

- iii. operating the system within the presence of an employee designated lead plant operator, or higher.
- d. TD Operator training may be accelerated based upon prior experience and history of the trainee.
- e. Upon completing on-the-job training, the employee shall be designated a qualified TD operator.

**TABLE II-4-1
 INITIAL CLASSROOM TRAINING TOPICS**

General Orientation:	
	Company Policies Eating, Smoking, Chewing Site Layout Site Security
Contingency Plan:	
	Implementation Internal Communications/Alarms Portable Fire Extinguishers Location of Emergency Equipment Equipment Spill Control Site Evacuation Procedure
Personal Safety Guidelines:	
	Exposure Routes Standard Personal Safety Equipment
Preparedness and Prevention:	
	Precautions for Ignition/Reaction Prevention Sparks or Sources of Ignition
Statutes, Laws, Regulations:	
	Definition of Hazardous Waste Manifest System (cradle-to-grave)

TABLE II-4-2 OPERATIONAL TRAINING TOPICS	
Incoming Shipment Procedures:	
	Approval of Incoming Shipments Manifest Systems
Storage/Treatment/Landfill Management:	
	Free Liquids Housekeeping Storage Area Operation Unloading and Washdown Landfill Operation Care in handling waste Equipment Operation and Safety Precautions - Unloading and Storage Evaporation Tank Operation Operation Inspections
Treatment Facility:	
	Macroencapsulation Treatment Formula Development Receiver Tank Operation Mixer Tank Operation Liquid Waste Storage Tanks Operations Shredder/Crusher Operation Material/Reagent Handling Automatic feed shut-off systems HVAC System Operation Thermal Desorption Operation Mercury Mixer(s) Operations
Management of Waste Containing Polychlorinated Biphenyls (PCBs):	
	Identification Characterization Acceptance Storage Requirements Decontamination Wind Dispersal Control Disposal Requirements

END OF ATTACHMENT II-4