

ATTACHMENT 6
TRAINING PLAN

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This training plan describes training for facility personnel who work with hazardous waste to ensure compliance with UAC R315-264-16. The training program is directed by personnel who have been trained in hazardous waste management procedures. The training program includes training on hazardous waste management procedures which are relevant to each position and includes instruction and annual re-training on implementation of the facility's Resource Conservation and Recovery Act (RCRA) Contingency Plan, which contains a description of emergency procedures, equipment, and systems.

The training is designed to ensure that personnel are able to respond properly to emergencies and that they are familiar with emergency procedures, equipment, and systems. These include procedures for using and inspecting the facility's emergency equipment and communication and alarm systems. Personnel are also trained in the proper responses for fires, explosions, and releases of hazardous wastes to air, soil, or surface waters.

Training instruction to meet RCRA requirements is accomplished with a RCRA training program, which covers a RCRA overview, and U.S. Environmental Protection Agency (EPA) regulations on hazardous waste identification, hazardous waste category determination, generator, transporter, and treatment, storage, or disposal facility (TSDF) requirements, manifesting, labeling, record keeping, and land disposal restriction (LDR) requirements.

1.0 OUTLINE OF INTRODUCTORY AND CONTINUING TRAINING PROGRAMS

An outline of the training program is in Table 1. Following a description of training programs are specific job titles and job descriptions of personnel at the Facility, including those related to hazardous waste management. It should be noted that this is a typical job title/description at the Facility. Job titles/descriptions are assigned to designated personnel, at which time the designated personnel will receive the appropriate training. This documentation will be maintained by the Facility.

Table 1
TRAINING PROGRAM SUMMARY

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| <p>1. U.S. Department of Transportation (DOT) Regulations. This program covers shipping papers, packaging, loading, unloading, marking, labeling, and placarding.</p> <p>Required every 3 years for Facility Manager / Facility Supervisor / Compliance Lead / Driver / Material Handler / Inventory Control Coordinator.</p> |
| <p>2. Resource Conservation and Recovery Act. This program covers regulations for generators, transporters, and treatment, storage, or disposal facilities (TSDFs). Includes training on the RCRA Contingency Plan</p> <p>Required annually for all facility personnel.</p> |
| <p>3. 24-hour HAZWOPER. Required by the Occupational Safety and Health Administration (OSHA) for training new employees before they are permitted to engage in hazardous waste operations.</p> <p>Initial 24-hour HAZWOPER with annual 8-hour refresher for Facility Manager / Facility Supervisor / Compliance Lead / Driver / Material Handler, and any others who manage hazardous waste on-site.</p> |
| <p>4. Hazard Communication Standard. This program covers Safety Data Sheets, labels, and industrial hygiene.</p> <p>Required for all facility personnel; after initial training, required for applicable personnel after a new hazard is introduced into the employees' work area.</p> |
| <p>5. Fire Safety. This program covers the elements of fighting small fires, and the use of fire extinguishers.</p> <p>Required annually for all facility personnel.</p> |
| <p>6. Toxic Substances Control Act, Sections 8C and 8E. This program covers reporting procedures for new hazards, or hazards not previously known.</p> <p>Required initially for all facility personnel.</p> |
| <p>7. Forklift. This program covers the safe operation of forklifts.</p> <p>Required every three years for Facility Manager / Facility Supervisor / Compliance Lead / Driver / Material Handlers.</p> |

1.1 Job Title/Job Description

Specific job titles and job descriptions of personnel at the facility related to hazardous waste management are outlined below. These personnel are supported remotely by corporate Univar health, safety, security and environmental (HSSE) personnel.

Facility Manager/Designated Representative

The Facility Manager directs operational activities for the Clearfield facility such as supervising warehouse and driver staff, facility layout and project management, strategic planning, and fleet management. The Facility Manager also manages regulatory and permit issues, dispatching, receiving, and the storing and handling of materials to meet customer requirements. Specific hazardous waste management activities are identified below:

- Oversee RCRA compliance for the facility, as it relates to handling, transporting and storing hazardous wastes, in accordance with Federal and State regulations.
- Responsible for maintaining Part B permit in conjunction with corporate personnel.
- Direct the safe and efficient operation of the facility and oversees the maintenance of vehicles and equipment.
- Train operations personnel in RCRA requirements and safety related issues.
- Responsible for the RCRA operating logs, manifests, and land ban certifications.
- Review and sign hazardous waste paperwork.
- Determine the correct placement of incoming hazardous waste.
- Position has responsibility to reject waste shipments or activities not in compliance.
- Coordinate transportation of waste and conduct inspections of the permitted waste storage areas.

The minimum education requirement for this position is a high school diploma and training in hazardous waste management procedures.

Facility Supervisor

The Facility Supervisor is responsible for directing daily facility functions and ensuring the plant is operating properly. They are also responsible for the facility inspection and operations in the absence of the Facility Manager. They are also authorized to act as an Emergency Coordinator, if necessary. The facility supervisor serves as a Material Handler when required. Specific hazardous waste management activities are identified below:

- Management of compliance with state and federal regulations governing hazardous waste operations at the facility
- Oversee required training for Inventory Control Coordinators

The minimum education requirement for this position is a high school diploma and training in hazardous waste management practices.

Compliance Lead

The Compliance Lead is responsible for directing daily hazardous waste functions. They are also responsible for the facility inspection and operations in the absence of the Facility Manager/Supervisor. They are also authorized to act as an Emergency Coordinator, if necessary. The Compliance Lead serves as a Material Handler when required. Specific hazardous waste management activities are identified below:

- Ensure compliance with state and federal regulations governing hazardous waste operations at the facility
- Review and sign hazardous waste paperwork
- Reject waste shipments or activities not in compliance
- Review samples and waste profile sheets
- Coordinate the transportation of waste

Inventory Control Coordinator

The Inventory Control Coordinator (ICC) is responsible for directing daily facility functions as it pertains to the plant inventory. They are also responsible for the cycle counts and reconciliation of inventory. In some circumstances, they can also serve as a Material Handler at the facility. Specific hazardous waste management activities are identified below:

- Prepare and file paper work involving hazardous waste shipments
- Maintain RCRA operating records, manifests, and land ban certifications
- Review and sign hazardous waste paperwork
- Review samples and profile sheets
- Assist in determining the correct placement of incoming hazardous waste
- Reject waste shipments or activities not in compliance
- Coordinate the transportation of waste

The minimum education requirement for this position is a high school diploma and training in hazardous waste management procedures.

Materials Handler / Driver

The Driver / Material Handler is responsible for driving transport vehicles in a professional manner, obeying state and federal regulations and speed limits, and also keeping abreast of all laws governing the trucking industry. The Driver / Material Handler loads and unloads trucks as well as shipping, receiving, storing and distributing materials. In addition, they are required to assist with general cleaning and organization of the plant or warehouse. Specific hazardous waste management activities are identified below:

- Handle and store hazardous waste properly as instructed by the Facility Manager
- Ensure paperwork is complete at the time of pick-up or shipment, i.e. signatures, dates, total number of pieces, total quantity, transporter numbers in place, etc.

- Ensure that the required documents are maintained with the truck
- Maintain knowledge of emergency procedures necessary in the event of a hazardous waste spill during transportation or storage of the material
- Review, sign, and file hazardous waste paperwork

A high school diploma is preferred for this position.

1.2 Description of How Training Will be Designed to Meet Actual Job Tasks

Job titles, major responsibilities, and education requirements for each position is described above. Introductory and refresher training for each position are described below. The names of employees filling each of these job descriptions are maintained by the facility.

Facility personnel are required to receive the necessary training within six months after the date of their employment or assignment to the facility, or to a new position at the facility. New employees at the facility may not work in unsupervised positions until they have completed the necessary training.

In addition to the Clearfield facility training programs included in Table 1, facility personnel may receive other remote or on-the-job training necessary for hazardous waste management operations, which will be documented by the facility.

1.3 Training Director

The person responsible for training for Clearfield facility personnel (i.e., Training Director) is the Facility Manager. The credentials for the Training Director include extensive experience in the hazardous waste management area and equivalent work experience. The Training Director has received RCRA and HAZWOPER training, and reviews and approves hazardous waste management training programs relevant to the facility.

1.4 Training for Emergency Response

The training is designed to ensure that personnel are able to respond properly to emergencies and that they are familiar with emergency procedures, equipment, and systems. These include procedures for using and inspecting the facility's emergency equipment, communication, and security. Personnel are also trained in the proper responses to fires, explosions, and releases of hazardous wastes to air, soil, or surface waters.

These requirements include the proper use of fire extinguishers, personal protective equipment, proper incident reporting, and responses to specific types of emergencies.

The RCRA Contingency Plan training covers emergency response procedures including the following specific subjects:

Communications & alarm systems

Fire and/or explosion
Spills or material release
Prevention of recurrence or spread of fires, explosions, or releases
Spill Control Plan
Post emergency equipment maintenance and notification
Container spills and leakage
Personal protective equipment

Classroom instruction to meet RCRA requirements is accomplished with the RCRA training program which includes a RCRA overview and EPA regulations concerning: hazardous waste identification; hazardous waste category determination; Generator, Transporter, TSDF requirements; manifesting; labeling; record keeping; and LDR notification forms.

Employee training also covers shut-down procedures during fire, spill, or other emergency.

2.0 TRAINING RECORDS

Training records are maintained on file or electronically and are available upon request. Training records for current personnel whose position is related to hazardous waste management will be maintained until closure of the facility. Training records for former employees will be kept for at least three years from the date the employee last worked at the facility. Data maintained in the records includes job titles, names, job descriptions and duties, date of hire, and actual training documentation completed by the personnel.