ATTACHMENT 4

PERSONNEL TRAINING

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1.0   Introduction

Clean Harbors Aragonite has in-house training programs for all employees. All personnel receive a general orientation training including first aid and CPR. When personnel are assigned to their respective groups, they receive specific job-related training. Until an employee is a qualified duty area operator, he/she must work under the supervision of a qualified area operator. All employees must successfully complete the courses in Table 2 prior to working unsupervised in the job title indicated.

Each department manager is responsible for the training and qualification of the individuals reporting to him/her. Overall coordination of the training program is the responsibility of the Health and Safety Manager.

2.0   Outline of Training Program

2.0.1   Aragonite Personnel

All Clean Harbors Aragonite personnel will receive training as noted on Table 2. Also, non-Aragonite personnel assigned to an Aragonite manager to work under his/her direct supervision (temporary employees), will have the same training requirements as for Aragonite personnel. All personnel will have job titles from the list in Table 2 and will be required to complete the training specified in Table 2.

The required training occurs within six months of date of hire or six months of assignment to Aragonite or within six months of a new position at Aragonite, whichever is applicable. Departmental qualification programs are not required to be completed within the six months of hire or six months after assignment, but the operator must have completed the applicable part of the departmental qualification program to work a duty area unsupervised. The Explosives Compliance and Safety training is also not required to be completed within six months of hire or six months of assignment, but an operator must have completed Explosives Compliance and Safety training before handling 1.3G explosives.

2.0.2   Non-Aragonite Personnel

Additionally, other personnel at the site will be required to receive a level of training consistent with their purpose at the site. These persons include contractors, Clean Harbors employees from corporate offices or from other facilities, visitors, and any others for whom training would be necessary. The following outlines the training required for these persons.

If the person will be working in areas where hazardous waste handling occurs, then the minimum required training will include courses HS2100 or HX2100 (and HS6301-HS6308 if applicable) and the Pre-project Environmental, Health, and Safety Review. If the person will be using an Aragonite forklift, then forklift training, course AG1300, or a comparable course (and AG1305 if applicable), is required.

Visitors who may be in areas where hazardous waste handling occurs are not required to have the training outlined above, provided they are constantly escorted by an appropriately trained Aragonite employee. Other persons not working in areas where hazardous waste handling occurs will have training consistent with their task. The minimum training required for each person will be determined on a case-by-case basis. At a minimum, all contractors, visitors, and

other non-Aragonite personnel will be required to receive basic orientation on the site, potential hazards and safety precautions, and evacuation procedures, prior to entering the site. This will be accomplished with an orientation film and documentation will be maintained on-site.

2.1 Training Review

Some courses require an annual or triennial refresher, such as First Aid and CPR. Annual refresher courses must be taken in the same quarter of the following year of the initial training. That is, if the initial training was January 15, then the refresher training must be taken no later than the end of the first quarter. The OSHA 29 CFR 1910.120 Refresher (Monthly Modules) will be completed on a calendar year basis. Explosives Compliance and Safety training must be completed before an employee handles 1.3G explosives. Refresher training for all topics on Table 1 occurs as noted.

2.2 Training Personnel Records

Records will be kept in an electronic records training management system (i.e., LMS or equivalent program) or in a file assessable at the facility for examination by the State of Utah and the EPA. Included in these individual employee training records will be:

- Attendance record at training sessions
- Qualification cards and examinations
- Training received (Summary with title of course and date. Cross-indexed to course content file)
- Previous training and education, i.e., certifications, certificates

The minimum training record documentation is described in section 2.5.

Also, available on-site, but not in each training folder, are the duty area rosters by day, the work orders for the Maintenance Department, the organization chart, and the course content files.

2.3 Training Coordinators

The training coordinators for the Clean Harbors Aragonite facility are the department managers, or their designees, who report to the facility general manager.

2.4 Training for Emergency Response

The contingency plan is the basis for emergency response training. Training is coordinated by the Health and Safety Manager or other qualified persons.

2.5 Training Documentation

Training will primarily be documented in an electronic records training management system (i.e., LMS or equivalent program). Other forms of documentation will be used (e.g., attendance forms, certificates of completion, computer printouts, etc.) when applicable (e.g., the course doesn't have a Peoplesoft course code, etc.). Each employee has training records maintained in an electronic records training management system (i.e., LMS or equivalent program) which is supplemented by a file maintained by each department, when needed. Training records on

current personnel must be kept until closure of the facility; training records on former employees must be kept for at least three years from the date the employee last worked at the facility.

To ensure that the training program is effective, and people are properly trained, exams or other measures of competency are used. If a person fails the exams or otherwise does not meet the minimum requirements of the training course, additional training will be required before the person is considered to have completed the course.

The following outlines the requirements for documenting compliance with the training requirements for non-Aragonite personnel.

Since the Pre-project Environmental, Health, and Safety Review is specific to the Aragonite facility, this training will be conducted by the facility and records will be maintained on-site documenting successful completion of the review for each person. However, other training may be completed at other locations.

For transient goods and services contractors who have received applicable training at other locations, training records will be available for review on ISN. If the transient goods and services contractor is not part of ISN, the employer will provide a letter certifying that this training has been completed by each of the employees that will be working at the facility. This letter will be kept on-site. Additionally, if requested by the Director, Clean Harbors Aragonite will acquire the records of training for specific individuals to demonstrate that the required training has indeed been completed.

Training records for Clean Harbors personnel who are not permanently assigned to the Aragonite facility will be provided upon request. When working in areas where waste handling occurs, they will be assigned a job title from Table 2 and the training specified in that table will be required.

For other persons not working in areas where hazardous waste handling occurs, if training in the courses listed in Table 1 is required, this will be documented and the records of successful completion of the required training will be provided upon request.

Table 1 - List of Courses			
Course Title	**Course ID[1]**	**Duration**	**Frequency**
OSHA 29 CFR 1910.120	HS2100 or HX2100	24 hr	Initial
OSHA 29 CFR 1910.120 Refresher	HS2200 or HX2200	7 - 8 hr	Annual
OSHA 29 CFR 1910.120 Refresher (Monthly Modules)	HS6301-HS6308	0.5 - 1 hr each	Annual
First Aid	HS6005 or HX6005	2 - 2.5 hr	Triennial
CPR	HS6000 or HX6000	3.5 - 4 hr	Annual
Permit Training	SS2000 and SS2030	9 - 10 hr	Initial
Permit Training Refresher	SS2001 and AG1685	0.5 - 1 hr	Annual
General Employee Training			
• Site Orientation	SS2016	1 - 1.5 hr	Initial
• Industrial Safety	SS2027	1 - 1.5 hr	Initial
• Fire Prevention	HS6020	1 - 1.5 hr	Initial
• Contingency Plan	SS2025	1 - 1.5 hr	Initial
Annual Refresher			
• Site Orientation Refresher	SS2017	≈ 0.25 hr	Annual
• Industrial Safety Refresher	SS2027	≈ 0.25 hr	Annual
• Fire Prevention Refresher	HS6020	≈ 0.25 hr	Annual
• Contingency Plan Refresher	SS2025	≈ 0.25 hr	Annual
Compressed Gases	SS4016	≈ 0.5 hr	Initial
Venting Lines	SS3242	≈ 0.5 hr	Initial
Standard/Dual Wheel Forklift	AG1300	6 – 8 hr	Initial
Standard/Dual Wheel Forklift Refresher	AG1305	≈ 1 hr	Annual
Confined Space	HS6700	2 - 2.5 hr	Initial
Confined Space Refresher[2]	HS6701	≈ 1 hr	Annual
Laboratory QC	SS2080	2 hr	Initial
Laboratory Safety	SS2081	2 hr	Initial
Explosives Compliance and Safety[3]	AG1686	1 – 2 hr	Initial – Prior to handling 1.3G explosives
Incineration Qualification Program[4]	-	-	Initial
Receiving Qualification Program[4]	-	-	Initial

Table 1 - List of Courses				
Maintenance Qualification Program[4]	-	-	Initial	
Production Qualification Program[4]	-	-	Initial	
Lab Qualification Program[4]	-	-	Initial	

Notes:
1. Course IDs are subject to change but will be associated with an equivalent course.
2. This course is only required for employees that fill out confined space permits. The individuals who are required to take this training are indicated in the Organizational Chart. All other employees receive refresher training through HS6304, which is part of the required OSHA refresher modules.
3. Only required for employees that handle 1.3G explosives.
4. Department specific qualifications are developed, tracked, and maintained by each department and will be made available for review upon request.

3.0   Job Titles and Duties
This section outlines the plant organization and required training.

The job titles for the Aragonite site are listed in Table 2. These job titles correlate to job descriptions, which are maintained by the department managers. Table 2 also lists the required training at the facility. A current organization chart is available on-site. The chart specifies by name which person fills what job title.

For any job title, different training may be required depending on the duty area they are filling. All departments, except the Maintenance Department, maintain a daily duty roster in their areas to document which person is filling what duty area per day. When applicable, employees that handle 1.3G explosives will be documented on each department's duty roster. The Maintenance Department maintains records of which employee completes each job through use of the work order repair system (FAM or equivalent).

3.1   Relevance of Training to Job Position
All employees receive general employee training designed to focus on the overall purpose of the Clean Harbors Aragonite facility.

Employees with specific assignments under the same job title, receive training unique to their area of responsibility. Specific course and On-the-Job training requirements are defined in each department's Qualification Program. Qualification Programs are maintained by each department. Each Qualification Program outlines the administrative and technical training requirements for each given duty area. In addition, these programs contain guidance to ensure all aspects of training are carried out effectively and consistently. Each department's Qualification Program is available for review on-site.

Employees that handle 1.3G explosives must have received clearance from the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) before being allowed to handle the material. Individuals that have received clearance are documented on the ATF License Notice of Clearance. The Notice of Clearance is available on-site for review.

For all personnel, except those in the Maintenance Department, there are specific duty areas to which they may be assigned. These may change from day-to-day. The training requirements for

a person to be able to fill specific duty areas are specified in the department's Qualification Program. No person may work unsupervised in one of these duty areas without having completed the associated required training.

Cross-training is available to enhance career advancement and understanding of the entire incineration system.

Courses described in this section are related to safety and waste handling and are offered to promote compliance with regulations and to aid in loss-time prevention.

Annually, the Managers will review the training program with the General Manager. The annual review will consist of evaluating faculty, courses to determine their relevancy and quality, updates to course names and codes, and new or updated job titles. Adjustments will be made as warranted, and any necessary permit modification request submitted.

Table 2 - Required Training

JOB TITLE	COURSE ID	COURSE NAME
The following are administrative support jobs that do not have any contact with hazardous waste:		
• Facility Administrator • Facility Purchasing Clerk • Custodian • Warehouse Technician • Receiving Coordinator • Compliance Guard • Facility Groundskeeper	HS6000 or HX6000	CPR
	HS6005 or HX6005	First Aid
	SS2016	Site Orientation
	SS2027	Industrial Safety
	SS6020	Fire Prevention
	SS2025	Contingency Plan
	SS2017	Site Orientation Refresher
	SS2027	Industrial Safety Refresher
	HS6020	Fire Prevention Refresher
	SS2025	Contingency Plan Refresher
	Qualification Program	Department specific qualifications if required for job title
The following are technical support jobs that have potential to work around hazardous waste:		
• General Manager • Compliance Manager • Health & Safety Manager • Facility Engineer • Facility Incineration Manager • Operations Manager • Facility Operations Manager • Incineration Blends Chemist • Facility Shipping Coordinator • Facility Foreman Admin • Facility Maintenance Manager • Maintenance Planner	HS2100 or HX2100	OSHA 29 CFR 1910.120
	HS6000 or HX6000	CPR
	HS6005 or HX6005	First Aid
	SS2000 and SS2030	Permit Training
	SS2016	Site Orientation
	SS2027	Industrial Safety
	HS6020	Fire Prevention
	SS2025	Contingency Plan
	HS2200 or HX2200 or HS6301-HS6308	OSHA 29 CFR 1910.120 Refresher

JOB TITLE	COURSE ID	COURSE NAME
	SS2001 and AG1685	Permit Training Refresher
	SS2017	Site Orientation Refresher
	SS2027	Industrial Safety Refresher
	HS6020	Fire Prevention Refresher
	SS2025	Contingency Plan Refresher
	AG1686	Explosives Compliance and Safety
	Qualification Program	Department specific qualifications if required for job title
The following are jobs that routinely work around hazardous waste:		
• Facility Maintenance Supervisor • I&E Technician (I-III) • Electrician (I-III) • Facility Maintenance Repair (I-IV) • Facility Incineration Supervisor • Control Board Operator (CBO) (I-III) • Incineration Operator (I-III, 1A, 1B) • Facility Operations Supervisor • Facility Foreman • Facility Technician (I-IV) • Receiving Chemist (I-III) • Receiving Technician (I-III)	HS2100 or HX2100	OSHA 29 CFR 1910.120
	HS6000 or HX6000	CPR
	HS6005 or HX6005	First Aid
	SS2000 and SS2030	Permit Training
	SS2016	Site Orientation
	SS2027	Industrial Safety
	HS6020	Fire Prevention
	SS2025	Contingency Plan
	SS4016	Compressed Gases
	SS3242	Venting Lines
	AG1300	Standard/Dual Wheel Forklift
	HS6700	Confined Space
	HS2200 or HX2200 or HS6301-HS6308	OSHA 29 CFR 1910.120 Refresher
	SS2001 and AG1685	Permit Training Refresher
	SS2017	Site Orientation Refresher
	SS2027	Industrial Safety Refresher

JOB TITLE	COURSE ID	COURSE NAME
	HS6020	Fire Prevention Refresher
	SS2025	Contingency Plan Refresher
	AG1305	Standard/Dual Wheel Forklift Refresher
	HS6701	Confined Space Refresher
	AG1686	Explosives Compliance and Safety
	Qualification Program	Department specific qualifications if required for job title
• Laboratory Manager • Laboratory Supervisor • Lab Chemist (I-III) • Lab Technician (I-II)	HS2100 or HX2100	OSHA 29 CFR 1910.120
	HS6000 or HX6000	CPR
	HS6005 or HX6005	First Aid
	SS2200 and SS2030	Permit Training
	SS2016	Site Orientation
	SS2027	Industrial Safety
	HS6020	Fire Prevention
	SS2025	Contingency Plan
	SS4016	Compressed Gases
	SS2080	Laboratory QC
	SS2081	Laboratory Safety
	HS2200 or HX2200 or HS6301-HS6308	OSHA 29 CFR 1910.120 Refresher
	SS2001 and AG1685	Permit Training Refresher
	SS2017	Site Orientation Refresher
	SS2027	Industrial Safety Refresher
	HS6020	Fire Prevention Refresher
	SS2025	Contingency Plan Refresher
	Qualification Program	Department specific qualifications if required for job title