

ATTACHMENT 4
PERSONNEL TRAINING

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1.0 INTRODUCTION

Clean Harbors has in-house training programs for all employees with additional training for employees assigned to the Clive facility. 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 qualified, he/she must work under supervision. All employees must successfully complete the courses in Table 2 prior to working unsupervised in the job title indicated.

The Clive Facility Operations 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 Clean Harbors Aragonite General Manager.

2.0 OUTLINE OF TRAINING PROGRAM

2.1 TRAINING REQUIREMENTS BASED ON ASSIGNED LOCATION

2.1.1 PERSONNEL REGULARLY ASSIGNED TO CLIVE

Personnel assigned to Clive shall receive the training required in Table 2. Also, non-Clive personnel assigned to work at Clive (e.g., temporary employees), will have received or completed the same or similar training required for the task. All Clive personnel will have job titles from the list in Table 2 and will be required to complete the training specified in Table 2. Employees assigned to Clive will be identified as such in the training records.

Clive personnel shall complete all required training within six months of their date of hire. Existing personnel reassigned to Clive or to a new position shall complete training for the new position within six months of assignment.

2.1.2 PERSONNEL NOT REGULARLY ASSIGNED TO CLIVE

Unless continuously escorted onsite at Clive by an appropriately trained Clive employee, visitors and personnel not regularly assigned to the Clive site must complete training to perform their duties while at the site. These persons include Clean Harbors Aragonite employees, contractors, other Clean Harbors employees from corporate offices or from other facilities, visitors, and any others for whom training would be necessary. The training required for each person will be determined on a case-by-case basis. At minimum, all unescorted contractors, visitors, and other non-Clean Harbors personnel shall complete an initial safety orientation prior to entering the site. Until training is successfully completed, the individual must also be supervised by a qualified employee. The following additional training is required:

A person working in hazardous waste handling areas must successfully complete courses HS2100 or HX2100 [and HS2200 or HX2200 or HS6301 through HS6308, if applicable], and the Pre-project Environmental, Health, and Safety Review.

If the person will be using a facility forklift, then forklift training, course HS4020, or a comparable course [and HS4026 if applicable], is required.

Persons working in areas where hazardous waste handling does not occur shall receive training consistent with their tasks.

2.2 TRAINING REVIEW

Some courses require an annual or triennial refresher, such as CPR and First Aid. Annual refresher courses must be taken in the same quarter of the following year of the initial training. That is, if the initial training occurred on January 15th, then refresher training must be taken no later than the end of the first quarter. Refresher training in all topics on Table 1 occurs as noted.

2.3 PERSONNEL TRAINING RECORDS

Training records of employees assigned to Clive will be kept at the Aragonite or Clive facility for examination by the Division of Waste Management and Radiation Control inspectors. The following will be included in these individual employee training records as applicable:

- Attendance record at training sessions
- Training received (Summary with title of course and date.)
- Previous training and/or education, i.e., certifications, certificates
- Employment dates including dates employee was assigned to Clive

The minimum training record documentation is described in Section 2.6.

2.4 TRAINING COORDINATION

The training coordination for the Clive facility will be done through combined efforts between the facility Operations Manager, Compliance Manager, and the Health & Safety Manager.

2.5 TRAINING FOR EMERGENCY RESPONSE

The contingency plan is the basis for emergency response training. Emergency response training is coordinated through combined efforts between the facility Operations Manager, Compliance Manager, and the Health & Safety Manager.

2.6 TRAINING DOCUMENTATION

Training will primarily be documented in an electronic records training management system. Other forms of documentation may be used (e.g., certificates of completion, computer printouts, attendance rosters, etc.) when applicable. Each employee has a training file maintained by the Facility Operations Manager. The records are maintained at either the Clive or Aragonite facilities. Training records on current personnel must be kept until closure of the operating portion 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.

Exams or other measures of competency are used to ensure that the training program is effective. 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-Clean Harbors personnel.

A job hazard analysis is conducted on waste streams that require atypical procedures. The training will be conducted by Aragonite or Clive facility personnel and records will be

maintained on-site or at the Aragonite facility, documenting successful completion of the review for each person. However, other training may be completed at other locations. In such cases, documentation will be available at either Clive or Aragonite.

For contractors who have received applicable training at other locations, the employer will provide documentation that this training has been completed by each of the employees that will be working at the facility. This documentation will be kept on site or at the Aragonite facility.

Training records for Clean Harbors personnel who are not assigned to the Clive 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 working in areas where hazardous waste handling does not occur, 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.

3.0 JOB TITLES AND DUTIES

This Section outlines the plant organization and required training.

The job titles for Clean Harbors employees assigned to Clive are listed in Table 2. Table 1 lists the required training at the facility. A current organization chart showing the employees assigned to the Clive facility is available at the facility. The chart specifies by name which person fills what job title.

All employees assigned to Clive receive general employee training designed to focus on the overall purpose of the Clive facility.

Clean Harbors Environmental Services will review the training program with Clive personnel annually. The annual review will consist of evaluating faculty and courses to determine their relevancy and quality. Adjustments will be made as warranted.

Table 1. List of Courses

Course Title	Course ID	Duration	Frequency
OSHA 29 CFR 1910.120	HS2100 (internal) HX2100 (external)	24 hr	Initial
OSHA 29 CFR 1910.120 Refresher	HS2200 (internal) HX2200 (external)	7 - 8 hr	Annual
OSHA 29 CFR 1910.120 Refresher (Monthly Modules) ¹	HS6301 – HS6308	0.5 - 1 hr each	Annual ¹
First Aid	HS6005 (internal) HX6005 (external)	2 - 2.5 hr	Triennial
CPR	HS6000 (internal) HX6000 (external)	3 - 4 hr	Annual
Permit Training—Clive	CL2000	9 - 10 hr	Initial
Permit Training Refresher—Clive	CL2001	0.5 - 1 hr	Annual
General Employee Training			
Course Title	Course ID	Duration	Frequency
Site Orientation—Clive	CL2016	1 - 1.5 hr	Initial
Industrial Safety	SS2027	1 - 1.5 hr	Initial
Fire Prevention	HS6020	1 - 1.5 hr	Initial
Contingency Plan—Clive	CL2025	1 - 1.5 hr	Initial

Table 1. Continued

Annual Refresher			
Course Title	Course ID	Duration	Frequency
Site Orientation Refresher(Clive Included)	CL2016	~0.25 hr	Annual
Industrial Safety Refresher	SS2027	~0.25 hr	Annual
Fire Prevention Refresher	HS6020	~0.25 hr	Annual
Contingency Plan Refresher-Clive	CL2025	~0.25 hr	Annual
Compressed Gases	SS4016	~0.5 hr	Initial
Standard/Dual Wheel Forklift	HS4020	6 - 8 hr	Initial
Standard/Dual Wheel Forklift Refresher	HS4026	~1 hr	Annual
Confined Space ²	HS6700	2 - 2.5 hr	Initial
Confined Space Refresher ²	HS6701	~1 hr	Annual
<p>¹ If the employee is taking the OSHA 1910.120 refresher monthly modules, they must complete a minimum of 8 of the 12 modules annually.</p> <p>² Only for those employees who prepare a confined space permit. Otherwise, this training is part of the OSHA 1910.120 refresher.</p>			

Table 2. Required Training

Job Title	Course ID	Course Name
<p><i>The training courses at right pertain to the administrative support jobs listed below that do not have any contact with hazardous waste:</i></p> <p>Receiving Coordinator</p>	HS6005 or HX6005	First Aid
	HS6000 or HX6000	CPR
	CL2016	Site Orientation - Clive
	SS2027	Industrial Safety Initial
	HS6020	Fire Prevention
	CL2025	Contingency Plan - Clive
	CL2016	Site Orientation Refresher (Clive Included)
	SS2027	Industrial Safety Refresher
	HS6020	Fire Prevention Refresher
	CL2025	Contingency Plan Refresher - Clive
<p><i>The training courses at right pertain to the technical support jobs listed below that have potential to work around hazardous waste:</i></p> <p>Facility Operations Manager</p>	HS2100 or HX2100	OSHA 29 CFR 1910.120
	HS6005 or HX6005	First Aid
	HS6000 or HX6000	CPR
	CL2000	Permit Training - Clive
	CL2016	Site Orientation - Clive
	SS2027	Industrial Safety Initial
	HS6020	Fire Prevention
	CL2025	Contingency Plan - Clive
	HS2200 or HX2000 or HS6301-HS6308	OSHA 29 CFR 1910.120 Refresher
	CL2001	Permit Training Refresher - Clive
	CL2016	Site Orientation Refresher (Clive Included)
	SS2027	Industrial Safety Refresher
	HS6020	Fire Prevention Refresher
CL2025	Contingency Plan Refresher - Clive	

Table 2. Continued

Job Title	Course ID	Course Name
<p><i>The training courses at right pertain to the jobs listed below that routinely work around hazardous waste:</i></p> <p>Facility Operations Supervisor</p> <p>Facility Technician</p> <p>Driver</p>	HS2100 or HX2100	OSHA 29 CFR 1910.120
	HS6005 or HX6005	First Aid
	HS6000 or HX6000	CPR
	CL2000	Permit Training - Clive
	CL2016	Site Orientation - Clive
	SS2027	Industrial Safety Initial
	HS6020	Fire Prevention
	CL2025	Contingency Plan - Clive
	HS2200 or HX2000 or HS6301-HS6308	OSHA 29 CFR 1910.120 Refresher
	CL2001	Permit Training Refresher - Clive
	CL2016	Site Orientation Refresher (Clive Included)
	SS2027	Industrial Safety Refresher
	HS6020	Fire Prevention Refresher
	CL2025	Contingency Plan Refresher - Clive
	HS4020	Standard/Dual Wheel Forklift
	HS4026	Standard/Dual Wheel Forklift Refresher
	HS6700	Confined Space ¹
	HS6701	Confined Space Refresher ¹
	<p>¹ Only for those employees who prepare a confined space permit. Otherwise, this training is part of the OSHA 1910.120 refresher.</p>	