

ATTACHMENT II-4
PERSONNEL TRAINING PLAN

TABLE OF CONTENTS
PERSONNEL TRAINING PLAN

1.0	INTRODUCTION	1
2.0	OVERVIEW OF RCRA TRAINING PROGRAM.....	1
3.0	CONTENT OF TRAINING COURSE MODULES	3
4.0	IMPLEMENTATION OF TRAINING PROGRAM	7

1.0 INTRODUCTION

The Grassy Mountain facility training program shall enable facility 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 facility 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 shall describe only that training which is required under the GMF RCRA Permit; other training is provided (e.g., OSHA or USDOT) which is not described by this Plan. Note however, that OSHA or USDOT classes can fulfill specific requirements of this plan.

2.0 OVERVIEW OF RCRA TRAINING PROGRAM

Facility personnel shall obtain “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 accomplished within six months of employment. Additional job specific training shall be given within six months of reassignment. Facility personnel participate in an annual review of general training.

2.1 RCRA PERSONNEL TRAINING REQUIREMENTS

The requirements for training are contained in R315-8.2.7 of the Utah Administrative Code. The general training provided to Grassy Mountain Facility personnel is provided in Appendix 2 to this Plan. Once each calendar year, not to exceed 15 months, "refresher" training, consisting of a review of the appropriate materials covered by the initial training program, shall be provided.

2.2 "FACILITY PERSONNEL" DEFINED

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...) hazardous waste and are assigned to the Clean Harbors Grassy Mountain, LLC facility. Not covered by this training program are positions such as personnel from other divisions of Clean Harbors and consulting engineers who are not involved in the management of hazardous wastes at the site. 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

Training records shall be maintained for all facility personnel. These include the job title of the position, job position description detailing the requisite skill, education, other qualifications and a list of both general and job position specific training for an employee filling that position. Documentation that the training or job experience has been received shall be maintained and

shall consist of training course attendance sheets, or certificate of completion for the class. Clean Harbors maintains a summary of completed required training for all employees and shall be made available to the Director upon request. Each employee's training shall be reviewed at least annually and documented in the individual's training record.

A list of waste management job positions at GMF and the name of the employee(s) filling each job shall be maintained at the facility.

Training records on current personnel shall be kept until closure of the facility; training records on 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.

Training records for non-facility personnel shall be made available upon request in order to demonstrate compliance with this plan.

2.4 OFF-SITE TRAINING

Training is available apart from the facility that can serve to fulfill the training required here-in. In some areas, experience, college credits or one or more degrees can serve to exempt a person from further training in a given area for the training year. Should this occur, documentation of the experience or college education must be incorporated into the employee's training record file.

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 can be documented by the trainee (self-certification) and used for fulfillment of the requirement for annual "refresher" training. If an employee requires annual job training, the company, in addition to the off-site "refresher," 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 be accomplished by the 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. The employee shall sign and date the outline. Certificates and outlines shall be kept in the employee's training record. The employee responsible for monitoring the training records for the GMF employees 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 the facility Personnel Training Plan. The self-documentation submitted shall be signed by a facility employee trained in the Personnel Training Plan of the facility.

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. This verification shall be documented in the employees training record.

2.5 CLEAN HARBORS-SPONSORED TRAINING COURSES

The goal of the training program shall be to ensure that facility personnel receive training

commensurate with their specific job functions. GMF can elect to sponsor and administer portions or all of the Training Program described herein. The descriptions listed in Section 2.0 of this Plan are typical of the basic concepts administered through the Training Program, regardless of whether they are conducted by Clean Harbors 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 2.

2.6 INSTRUCTOR QUALIFICATION

Instructors shall be considered to be 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 the module that will be taught. Training courses presented by non-Clean Harbors groups shall be considered for appropriateness and applicability and only determined to be acceptable if the module meets the objective of the GMF Personnel Training Plan.

Credentials of all instructors shall be incorporated into the operating record.

3.0 CONTENT OF TRAINING COURSE MODULES

All Grassy Mountain Facility 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. Hazard Communication & Toxicology

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. Precautions to be taken in handling hazardous wastes and the reasoning for such measures shall be emphasized. 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 be tailored to meet 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 29CFR 1910.120. Clean Harbors provides medical surveillance to employees that work in potentially hazardous environments. Training is provided to explain the Clean Harbors medical surveillance program, which includes the hearing conservation and monitoring.

Blood borne Pathogen Guidelines are reviewed for the safety of all Clean Harbors' employees. The guidelines are designed to prevent accidents, injuries or illness caused by the unintentional exposure to blood, blood products or OPIM's (other potentially infectious materials). The review of these procedures will help prevent workers from accidentally being exposed to injury, 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 & 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. Lockout and tag out requirements and procedures shall also be taught in this module.

Employees will be trained on 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 Clean Harbors Grassy Mountain facility. The program focuses on the OSHA requirements as well as the health and safety procedures for Clean Harbors Grassy Mountain.

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 Clean Harbors Grassy Mountain. 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 the Emergency Response program and to understand the Clean Harbors policies and procedures for

site safety and emergency response.

3.1.8 Drum and Material Handling

This module is designed to train employees on 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 to 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.) will be required to be familiar with the operating practices for their respective units. Each operator will be instructed in the permit module for his or her unit. 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.

Typical titles of modules used to cover this material are: Drum Dock Operations, Industrial Cell Operations, RCRA Cell Operations, Stabilization/Solidification, Truck Washout, TSCA Cell Operations, and Waste Sampling.

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 may be performed in the field. These periodic drills may simulate fire, explosion, or emission or discharge of hazardous materials. Reviews are conducted as deemed appropriate to maintain readiness for emergency response but at least once per year. A form is provided as part of the Site Inspection Plan (Attachment II-3) to

document the annual drill.

Typical modules used to cover this topic are: Contingency Plan, Preparedness and Prevention Plan, Procedures for Using, Inspecting, Repairing and Replacing Facility Emergency Equipment, and Site Inspection.

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/Response to Groundwater

The annual RCRA / response to groundwater initial 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 of a copy of the Permit is located. The protection of the facility's groundwater is important, so methods to prevent contamination are discussed with the employees.

3.2.7. DOT Training (3 years)

Training for the Department of Transportation hazardous materials regulations is conducted every three (3) years for employees involved with the handling of hazardous materials. The training is conducted to maintain compliance with Title 49 of the Code of Federal Regulations.

3.2.8. First Aid, CPR (2 years)

The 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. H & S Admin Personnel (annual)

Health and Safety training for Administration personnel is accomplished by the participation in the monthly 8-hour OSHA refresher modules.

4.0 IMPLEMENTATION OF TRAINING PROGRAM

Upon employment or assignment to the facility, a training file shall be created for the employee as described in section 1.3 of this plan. Reassigned employees at the facility shall have their records reviewed for training adequacy.

1. Lists of typical training modules taught shall be included as Appendix 1. Modules typically consist of all or parts of the basic concepts described in Section 2 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 found in Appendix 2.

APPENDIX 1

TYPICAL GRASSY MOUNTAIN TRAINING OUTLINE

TYPICAL GRASSY MOUNTAIN TRAINING MODULES

DESCRIPTION	APPROXIMATE LENGTH (hr)
<i>Company Orientation</i>	<i>1</i>
a. Company Philosophy and method of operation	
b. Specific Rules and Regulations	
c. Facility Description	
d. Operations and basic office procedures	
<i>Chemical Terminology, Toxicology and Handling</i>	<i>2</i>
a. Chemicals and Toxicology	
b. Handling Hazardous Wastes	
c. Procedures and Practices mixing waste	
d. Incompatible wastes	
<i>Operating Practice</i>	<i>7</i>
a. Drum Dock Operations	
b. Industrial Cell Operations	
c. RCRA Cell Operations	
d. TSCA Cell Operations	
e. Truck Washout	
f. Waste Sampling	
g. Stabilization and Solidification	
<i>Contingency Plan</i>	<i>1</i>
a. Preparedness and prevention Plan	
b. Procedures for using, Inspecting, Repairing and Replacing Facility Emergency Equipment, and Site Inspection.	
<i>Respiratory Equipment</i>	<i>1</i>
a. Proper use, fit and basic inspection and maintenance of respiratory equipment	
b. Where and when respiratory equipment is to be used at GMF.	
<i>Miscellaneous Topics</i>	<i>1</i>
a. Record Keeping	
b. Site Security	
c. Update of Regulations	

GMF101 - OPERATING PRACTICE - DRUM DOCK OPERATIONS

Course Description:

This course provides basic training for employees who as a part of their duties manage, sample and store drum loads at the Grassy Mountain Drum Management facility. The program provides a basic understanding of the requirements set forth in module III of the site part B permit, and a practical approach of compliance with these requirements. The course materials will be presented in part or as a whole to employees based on their specific job function within the unit. The course is designed to take both a knowledge and skill-based approach to the subject Drum Dock Operations.

Objectives:

- A. Waste Identification - provide an understanding of Module III.B., which refers to the types of waste allowed to be stored in the waste management unit (e.g., RCRA wastes, CERCLA wastes, and incineration residue wastes). Employee will develop a working knowledge of all RCRA “D listed” waste codes and will know where reference materials may be obtained on all other codes.
- B. Container Condition - provide the employee with an understanding of Module III.C. regarding the condition of containers and the requirements to take remedial action if the container does not meet the criteria set forth by the permit.
- C. Compatibility of Waste with Containers - provide the employee with an understanding of Module III.D. and the need for waste compatibility with the container in which it is shipped. Introduce the employee to attachments and tables describing container materials compatible with various waste streams.
- D. Management of Containers - provide the employee with an understanding of Module III.E. and related attachments pertaining to the management of containers in the unit. The employee will understand the time constraints governing the unloading, and treatment of loads as stated in this section, and the precursory requirements of the permit.
- E. Containment - provide the employee with an understanding of Module III.F. and the associated attachments pertaining to containment within the management unit and the capacity limits in gallons as stated in this section for Topdock 1 (TD01), Topdock 2 (TD02), Sample Pad (SPAD), North Pad (NP01) and South Pad (SP01).
- F. Drain & Flush Building Warehouse One – provide the employee with an understanding of Module III.G., mercury container storage and process areas A1, A2/A4, and A3. This includes capacity limits in gallons and container management.
- G. Special Requirements for Ignitable or Reactive Waste - Provide the employee with an understanding of Module III.J. and attachments, pertaining to the management of ignitable and reactive wastes as stated in the permit.
- H. Special Requirements for Incompatible Waste - Provide the employee with an understanding of Module III.K. and attachments, pertaining to the placement and management of incompatible wastes. The employee will understand the restrictions of this section and the need for documentation in the facility operating record required by R315-264-17(c).

- I. Identification of Location of Containers on Operating Record - Introduce the employee to the facility Operating Record and provide an understanding as to the requirements in Module III.L. pertaining to listing the location of hazardous waste containers stored within the management unit in the operating record. The employee will understand the specific requirements of this section in relationship to time constraints and documentation.
- J. Inspections - provide the employee with an understanding for the need of inspections in Module III.M. and the importance of correcting any conditions identified during the inspections.

Prerequisites: Medical Clearance, OSHA 24-hour HAZWOPER, RCRA Modules, Company Overview, and Contingency Plan.

Duration: Approximately 4 hours classroom & 40 hours “hands-on.”

Instructor: Area supervisor or another experienced person.

Evaluation: Written examination, observation during 40-hour “hands-on” training.

APPENDIX 2
TRAINING MATRIX

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	Response to Ground Water (annual)	SPCC Training (annual)
Compliance Guard			X	X	X	X	X	X			
Compliance Manager	X	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 General Manager	X	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 Treatment Foreman	X	X	X	X	X		X	X	X		X
Lab Chemist	X	X	X	X	X		X	X		X	
Laboratory Manager	X	X	X	X	X		X	X		X	X
Operations Manager	X	X	X	X	X		X	X	X	X	X

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

Hazard Communication & Toxicology, Medical Surveillance, Hearing Conservation & Bloodborne Pathogens, Respiratory Protection, Confined Space & Heat Stress, PPE & Hearing Conservation, Decontamination, Emergency Response, Drum and Material Handling.

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