

SECTION H

PERSONNEL TRAINING PLAN

Revision No.

5.0

SECTION H
PERSONNEL TRAINING PLAN

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SECTION H

PERSONNEL TRAINING PLAN

H-1 Introduction

5 In accordance with state and federal regulatory requirements, the Facility has developed this Training Plan as an integral part of the RCRA Part B Permit Application for the Emelle, Alabama Facility, which is located in Sumter County, Alabama. A copy of this plan is available at the Facility at all times.

10 Training is essential to the efficient and safe operation of all Facility processes and to ensure rapid and effective responses to emergency conditions. It is a policy of the Facility that all employees be trained to perform in a manner which emphasizes accident prevention in order to safeguard human health and the environment.

H-1a General Training Concept

15 Each new employee is trained in the general orientation and operation of the Facility. This introductory training will be completed within six (6) months of the new employee's entry into a specific job. No employee is permitted to work under reduced supervision until the Facility Manager (or designee) has determined that the employee has successfully completed the elements of the introductory training program. A specific program related to the duties/performances of each job function is specifically tailored for the position. In addition,
20 every employee will participate in continuing training to maintain proficiency, learn new techniques and procedures, and to reinforce safety and compliance consciousness.

H-1b Program Implementation

Implementation of the training program encompasses the following:

- 25 • identification of training requirements (for each job);
- selection of qualified instructors;
- delivery of training program;
- employee testing and performance evaluation (if required); and
- documentation of each training session.

30 Responsibility for the training program rests with the Facility Manager. The Facility Manager or designated representative selects qualified instructors, trained in hazardous waste management procedures, participates in development of the training program's content and format, provides

the necessary resources, and ensures the employee training records are maintained. The Facility Manager may appoint a designee to coordinate the planning, organization, implementation and control of the training programs.

- 5 The Facility will ensure that all employees are trained to perform the functions of his/her job position and to be able to respond effectively to emergency situations at the Facility, as required by ADEM Administration Code Rule 335-14-5-.02(7)(a)(1). Employees involved in the operation of processes that may require emergency shutdown will be trained in appropriate procedures for that area. Personnel will be trained initially, before working unsupervised, and then annually
10 thereafter, as described in Subsection H-3c of this section.

H-2 Position (Job) Descriptions

Training is tailored to prepare the employee to perform the functions of his/her position safely and effectively and to ensure that the employee will be able to respond effectively to emergency situations at the Facility. Job descriptions are the key to designing specific training programs
15 because they identify the responsibilities and duties of each position.

H-2a Facility Organization

The primary functions of this Facility are the storage, treatment and disposal of hazardous wastes, which involve properly trained personnel. In addition, associated business activities include general management functions performed by technical support personnel
20 (e.g., laboratory chemists, engineers), and administrative staff (e.g., financial, clerical, etc.). A typical organizational chart, shown in Figure H-1, which is provided at the end of Section H, reflects the general reporting relationships among job positions for this Facility.

H-2b Staff Positions

A complete list of job positions along with employees filling each listed position is maintained at
25 the Facility, as required by ADEM Administration Code Rule 335-14-5-.02(7)(d)1. This list may be modified and updated as necessary to reflect changes at the Facility. A position description, including the job function, basic duties and responsibilities, and required qualifications is maintained at the Facility for each position engaged in hazardous waste management. An example of a typical position description is provided in Appendix H-1 to this Section. The
30 Facility organization chart, position titles, and description format may be changed from time to time, as treatment processes are added, position responsibilities are modified and/or as the Facility implements modifications to its operations.

Current position descriptions, job titles and organizational charts will also be maintained at the
35 Facility. In addition, the name of the employee filling each position to hazardous waste

management will be maintained on-site and will be available upon request, as required by ADEM Administration Code Rule 335-14-5-.02(7)(d)1.

H-3 Training Program

5 All personnel employed at this Facility undergo continuing training pursuant to this plan. All new employees are introduced to the full training and qualification process discussed herein and illustrated in Figure H-2, which is provided at the end of Section H. New employees are considered trainees until they have successfully completed an initial training period, which will be no longer than six (6) months in duration.

H-3a Scope of Training for New Personnel

10 Each new employee undergoes an initial introductory training process as described in Section H-3a(1). The amount of job specific and special skills training an employee receives depends upon his or her job duties, other responsibilities such as casualty control and the employee's ability based upon prior experience. Moreover, the method for determining the amount of training that a specific new employee will receive is explained in Section H-3b(4) of this plan.

15 H-3a(1) General Training

All trainees complete a series of general training courses to become familiar with the Facility and basic emergency response skills. These courses ensure the trainees have basic skills to protect themselves and their fellow employees.

20 One element of general training is initial/introductory orientation and basic safety training which introduces trainees to the company, the management and operations of this Facility, and basic health and safety skills. This training includes:

- procedures for entering and leaving the Facility;
- 25 • Facility layout, including restricted areas;
- the nature and characteristics of hazardous wastes;
- an overview of federal, state and local regulations;
- an overview of the Facility's treatment and disposal processes;
- basic personal protection techniques and the safety rules of the Facility;
- 30 • general Facility rules and administrative procedures, and
- organizational structure for the Facility.

During orientation, the employee also is familiarized with the Facility's Emergency Response and Preparedness Procedures that include the Emergency Response Plan, communication systems, evacuation procedures, and the locations of some emergency equipment. Training in emergency procedures is provided by one of the Facility's Emergency Coordinator, or other qualified trainers. At a minimum, it includes:

- description of possible emergency situations;
- duties of the Emergency Coordinator and other team members;
- emergency communication and alarm systems;
- evacuation procedures and routes;
- emergency equipment such as alarms, first aid stations, eye wash stations, safety showers, some firefighting equipment, etc.; and
- incident/action reporting mechanism(s).

This training consists of classroom instruction which helps (1) identify areas of potential risk, (2) provide examples of emergency equipment, and (3) indicate routes to be used in the event that an evacuation is ordered. The trainer must assure that each trainee has knowledge of the evacuation procedures.

As part of their initial training, all trainees (including clerical employees) also are trained in basic firefighting (e.g., use of fire extinguishers). The training includes special hazards, particularly the hazards created when chemicals stored at the Facility come into contact with heat or water.

Additionally, new employees will participate annually in at least one emergency simulation or evacuation exercise to practice evacuation of the Facility.

H-3a(2) Job-specific Training

After completing general training, trainees are given instruction to address the specific needs of their job functions and to ensure work is performed safely and in accordance with applicable regulations.

The training for each employee is geared to the duties/performances and the responsibilities of that employee's position. A list of required training courses is prepared for each job position. The Master List of Courses addresses these major training topics:

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- **Chemical hazards awareness** which expands upon the hazard recognition skills, learned during orientation and basic safety training. Based upon job duties, the employees learn how to identify chemical hazards in their work area; common hazard warning systems used at the Facility; sources of data on the chemicals such as MSDS's; and handling precautions for the chemicals that the employees will be working with.
- **Personal protection** which takes employees through the care, use, limitations and decontamination of the respirators and the protective clothing that are required for their job duties. This training supplement what the employees learned during general training about basic personal protection techniques and clothing. If required for their job functions, the employees will also learn how to use eye wash/chemical safety showers and hearing protection.
- **Regulatory compliance training** appropriate for their job duties such as manifest preparation, labeling, placarding and waste acceptance procedures. This training provides an in-depth review of federal and state regulations, with an emphasis on applications to the Facility. The employees are familiarized with proper forms and instructions on how to properly review them for compliance with applicable regulations. This training also expands upon the skills learned during orientation.
- **Job-specific operations and maintenance training** which provides instruction in those skills that an employee must master to perform his job duties. This training may include coverage of the following elements as appropriate for the job duties:
 - Work area/process description and its relationship to other Facility units.
 - Process and equipment use and inspection, routine maintenance, operation and shutdown during normal and emergency situations which also includes, where applicable, operation of built-in controls and/or containment mechanisms such as key parameters for automatic waste feed cut-on/cut-off systems.
 - Over the road and off-highway mobile equipment inspection, routine maintenance, operation and safety procedures.
 - Maintenance, including inspection schedules, repair and decontamination for processes, equipment, vehicles and the Facility's emergency and monitoring equipment.
 - Materials handling, loading and unloading, drum handling and storage.
 - Recordkeeping requirements.

An example of typical training courses is provided in Appendix H-2. A current Master List of Training Courses is maintained at the Facility. The Facility Manager or designee, such as the Human Resources Manager, reviews and approves the Training Courses by Job Title List prepared by the supervisors and training personnel. Once approved, these lists are used to control the training of employees filling the positions.

H-3a(3) Special Skills Training

As required, employees are provided with comprehensive skills training to prepare them for special duties such as emergency response activities. Depending upon their duties, the employees are familiarized with Facility procedures, equipment, and response systems. For example, specialized emergency response training may include some of the following elements, as applicable:

- procedures for inspecting, repairing and replacing Facility equipment and monitoring equipment, as required by ADEM Administration Code Rule 335-14-5-.02(7)(a)3;
- procedures for using the emergency communications and alarm systems;
- response duties in the event of fires or other incidents;
- response procedures for incidents that release hazardous wastes, including spill containment/cleanup procedures to prevent groundwater contamination;
- response procedures for groundwater contamination incidents (e.g., implementation of the compliance monitoring program);
- Cardio-Pulmonary Resuscitation (CPR);
- casualty control procedures;
- key parameters for automatic waste feed cut-off systems; and
- shutdown of operations.

Generally, at least two employees per operating shift have been trained in cardio-pulmonary resuscitation (CPR). This training may be conducted by the American Red Cross, the American Heart Association, local fire department, and/or qualified first-aid equipment representatives and may be conducted in conjunction with the Emergency Medical Technical Continuing Education training program.

Employees assigned to the Emergency Response Team are trained further in the use of casualty control procedures. This training may be taught by the Facility's Health and Safety Manager, Emergency Coordinator, local fire department, the American Red Cross or other qualified instructors. Techniques include the following based upon responsibilities:

- search and rescue procedures;
- injury evaluation;
- decontamination of victims;
- coordination with ambulance personnel;
- 5 • safe transport of injured personnel;
- evacuation procedures; and
- communications with emergency response organizations, such as emergency medical treatment centers, CHEMTREC, and the National Poison Control Center.

H-3b Training Program Administration

10 The selection of qualified instructors, the use of effective training formats, and the establishment and use of meaningful methods for evaluating an employee's learning are critical. The procedures for performing these training functions are described in the following subsections.

H-3b(1) Training Personnel Qualifications

15 The Facility Manager will provide guidance on the selection and/or approval of individuals designated to conduct the specific portions of the training program. The trainers (instructors) are recognized consultants and in-house specialists in the specific fields being taught and have broad experience in hazardous waste management. This actual hands-on experience is important so that the instructor can relate the specific subject area to actual Facility operation and can answer employee questions. Specific training may be conducted by an immediate
 20 supervisor, department manager, safety personnel or the Facility Manager or his designee. Supervisory personnel are encouraged to sharpen their instructional skills by attending classes, seminars, meetings, and workshops.

H-3b(2) Training Formats

25 Training is conducted in classroom meetings, small discussion groups, in-field exercises, emergency drills, and at employee's workstation (i.e., on-the-job). These activities may be supplemented by reading, problem sets, and other teaching aids. For some classroom training courses (such as for equipment operators), teaching materials developed by the manufacturer are often used, either by arranging for the course to be presented on-site or by sending employees to the manufacturer's training sessions. Field demonstrations and practice sessions
 30 reinforce skills and promote safety awareness.

The employee's supervisor is responsible for on-the-job training to assure that the employee learns correct procedures; can perform them accurately, reliably, and efficiently; and is safety conscious. The employee is assigned increasingly complex or responsible duties based on
 35 demonstrated performance.

The Facility will ensure that all employees are trained to perform the functions of his/her job position and to be able to respond effectively to emergency situations at the Facility, as required by ADEM Administration Code Rule 335-14-5-.02(7)(a)(1).

5 **H-3b(3) Training Effectiveness Evaluation**

Training effectiveness is measured by one or more of the following:

- written examinations;
- oral examinations; or
- 10 • job performance evaluations.

The trainer determines whether or not the employee has demonstrated competency in the training topic by evaluating demonstrated knowledge or performance. If an employee does not demonstrate competency in the topic, retraining will occur.

15

Successful training of the employee will be documented by the trainer on a training completion list or recorded in the employee's training records. An example of a training completion list is provided in Appendix H-3. If the trainer determines that the employee does not successfully complete the training, he/she will note on the form or in the files that the requisite training has not been satisfactorily completed. If the trainer determines that the employee cannot successfully perform a task in that position, the employee will not be allowed to perform that specific task. The term "successful" is defined as a demonstration of competency in the topic trained on, as determined by the trainer.

20

H-3b(4) Qualification Of Trainees For Work Under Reduced Supervision

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No employee may perform work unsupervised at the Facility until he or she has been qualified as fully trained by the Facility Manager or a designee such as the Environmental, Health and Safety Manager, the Training Specialist and the trainee's supervisor. The Facility Manager or his designee determines the amount of job-specific or special skills training a new employee needs in addition to the general training requirements. This determination is made by

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comparing the employee's records of employment with the job description and the Training Courses by Job Title for each position. An example of training courses by job title is provided in Appendix H-4. Based upon this review, the necessary job-specific courses for an employee are scheduled. As an employee completes this required training, the employee's Training History Record is updated. This record is reviewed to evaluate the employee's training completion status. This periodic evaluation continues until all of the required training has been successfully completed. This qualification sequence is shown in Figure H-2.

35

H-3b(5) Trainee Feedback

Trainee comments and constructive criticism of the training program are encouraged throughout the entire training process. Such comments are used by the trainers to modify/improve training program scope, content, and/or format.

H-3c Continuing Training

An employee's training does not end with his/her initial qualification. In fact, training never ends as long as the employee continues to work at the Facility. Periodic "refresher" training is required and provided, as discussed herein. As required by ADEM Administration Code Rule 335-14-5-.02(7)(c), Facility personnel will complete an annual review of the initial training required by ADEM Administration Code Rule 335-14-5-.02(7)(a). This annual review of initial safety and health topics, applicable to each employee's position, will be completed annually.

New employees, hired before each annual training session is held, will receive initial training and annual review training. New employees will then take required annual training on the same frequency as existing employees.

Employees transferring from another CWM facility will receive annual refresher training, if due, before working unsupervised. They will then be scheduled to attend annual refresher training on the same frequency as other Facility personnel. No employee will be exempt from annual continuing training.

Continuing training for Facility employees will include safety meetings, annual fire extinguisher practice, and annual emergency response review, including Emergency Response Plan (Contingency Plan) training and any additional training as needed to cover any changes to the Facility procedures or operation. No employees will be exempt from annual continuing training.

H-3c(1) Frequency Of Training

Continuing training is designed to maintain proficiency in job skills, increase safety and quality consciousness, and to teach new skills. Such training consists of regularly scheduled:

- safety meetings;
- annual emergency response training and exercises;
- annual respirator and protective equipment reviews (where applicable);
- annual CPR recertification as required, or equivalent; and
- as needed training to teach new skills, new operating procedures, or greater depth in specific areas.

This continuing training program is depicted in the flow diagram provided in Figure H-2.

H-3c(2) Continuing Training Content

5 Safety meetings are regularly scheduled for the employees. These sessions are led by the Environmental, Health and Safety or a qualified member of management. These meetings are used to educate, to communicate with and to motivate employees. The agendas cover many topics that may range from a review of a safety procedure such as equipment lockout, to a presentation on regulatory or policy changes, to discussion of accident prevention goals. Thus, safety meetings may or may not include performance evaluations, depending on the nature of the meeting topic.

10 The annual emergency response review is planned by the Emergency Coordinator or alternate qualified personnel. An emergency scenario or incident (e.g., spill, fire, explosion, or sudden waste release), may be simulated, and employees respond/discuss according to their assigned emergency response duties.

15 Annual refresher training related to Emergency Response and Preparedness, including Contingency Plan training is required of all employees. This training reviews the Facility operations and may be held in conjunction with the Emergency Response Review.

20 On an as needed basis, training is provided to cover any changes in Facility procedures or operations and to teach new skills either before, during or after such changes occur. Training to enhance the broad waste management skills of management and supervisory personnel may also be provided. Some of this training may be accomplished through attendance of adult education classes, colleges, and/or seminars at off-site institutions. At a minimum, training on hazardous waste operations will be provided within ninety (90) days after a change in Facility procedures are implemented.

H-3d Documentation of Training

30 Employee training records are maintained on-site in the Facility's operating record. The records contain a brief written description of the content of each training session; identify the attendees and trainer(s); list the dates of training sessions; and contain signatures of trainers and attendees certifying that the training was accomplished. The trainer and the trainee will both sign the training completeness form, as required by ADEM Administration Code Rule 335-14-5-.02(7)(d)4. An example of a typical training completion list is provided in Appendix H-3.

35 Each employee has a training history file at the Facility that contains his/her job description and the job position training requirements list for that description. Appropriate documentation indicating that the requisite training has been satisfactorily completed will also be maintained at the Facility. Electronic media may be used for tracking training information. Electronic media

enhance the recordkeeping process by documenting course titles, course length, position titles, names of employees in each position and training requirements for each position. Electronic media will also produce required training and summary reports along with historical training data. All original training documentation (i.e., sign-in sheets, course outlines, examinations and/or performance documentation) will be maintained at the Facility.

Training documentation for current employees will be maintained in a file at the Facility until closure. For at least three (3) years after Facility closure, personnel training records will be retained.

An employee's training history records may be sent to the Facility Manager of any other Facility owned/operated by Chemical Waste Management, Inc. (or Waste Management, Inc.) to which the employee may be transferred. Training files of employees who leave employment with Chemical Waste Management, Inc. will be retained at the Facility where they last worked for at least three (3) years following the date of last employment.

[End of Section H Text]

SECTION H
PERSONNEL TRAINING PLAN

FIGURES

FIGURE H-1
FACILITY ORGANIZATIONAL CHART

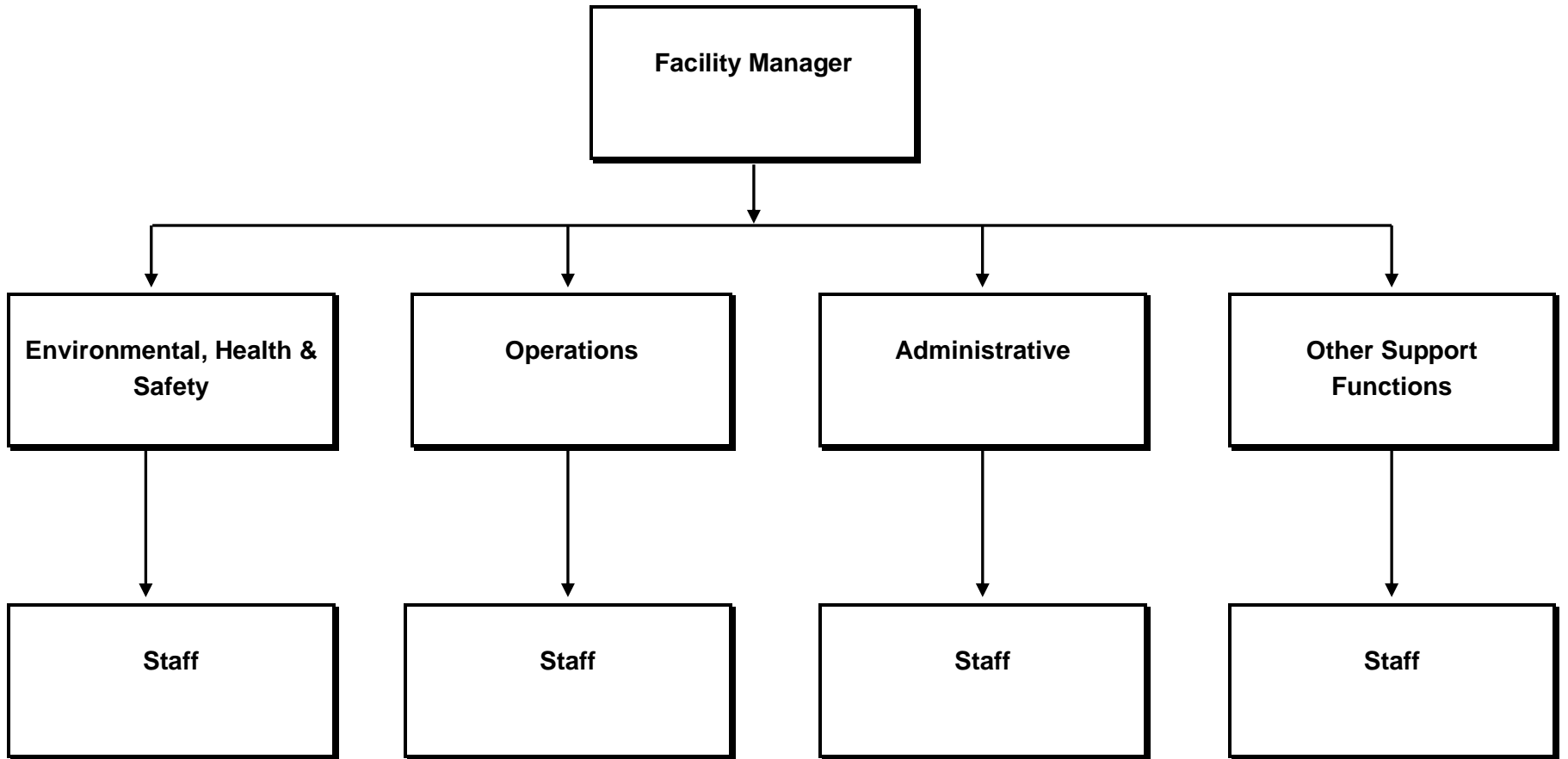
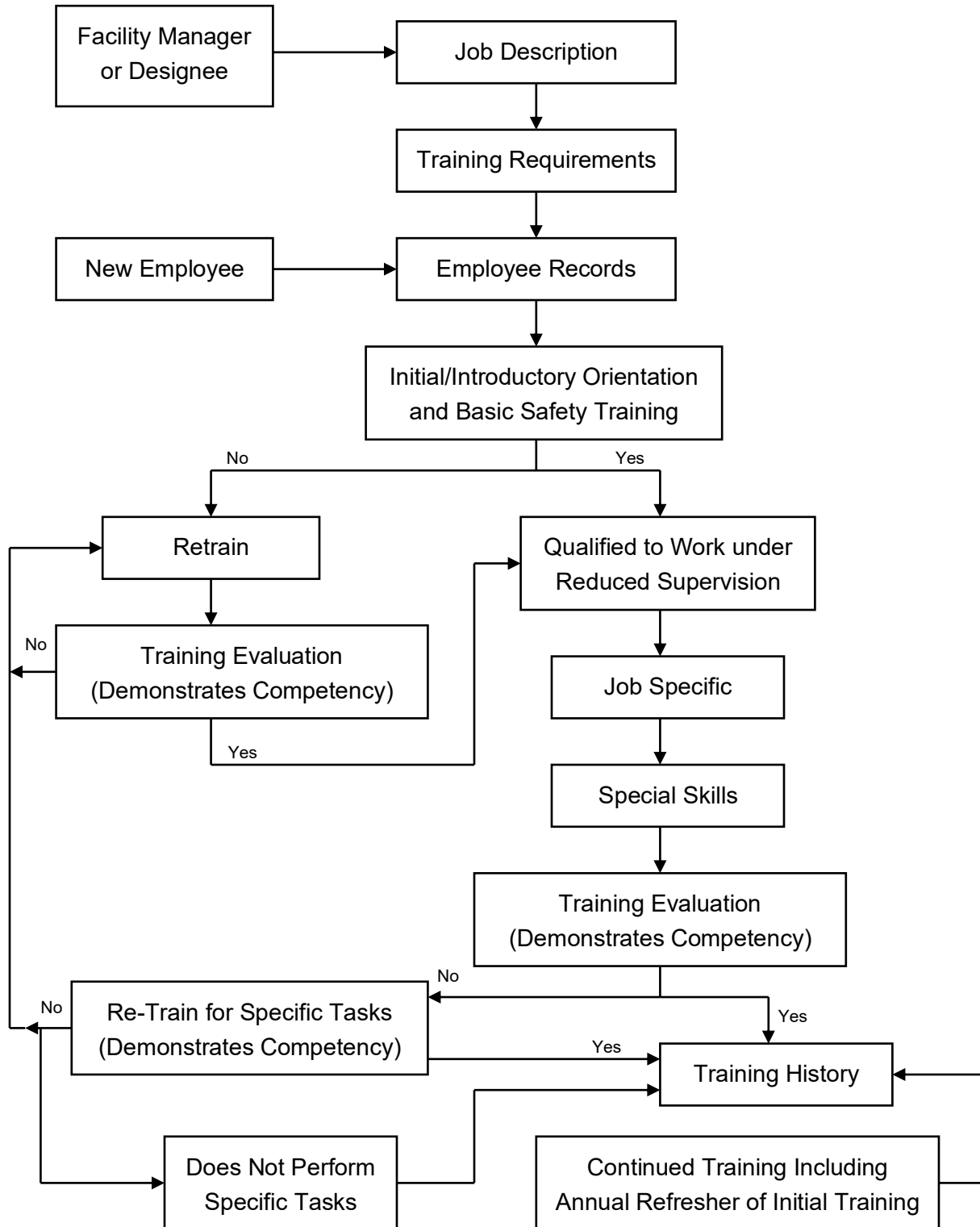


FIGURE H-2

FLOW DIAGRAM FOR TRAINING AND QUALIFICATION PROCESS



APPENDIX H-1

SECTION H

EXAMPLE OF A TYPICAL POSITION DESCRIPTION

Revision No.

5.0

CHEMICAL WASTE MANAGEMENT, INC.

JOB TITLE: Waste Tracking Specialist **DEPARTMENT:** Drum Process

5

JOB SUMMARY:

Responsible for tracking waste movements after analysis and approval by Lab. If any discrepancies are found between paperwork and loads, contact Supervisor. Maintain all tracking records associated with waste movement, and submit copies of records to designated area. Ensure work area is kept clean and orderly. Other duties as assigned by Supervisor.

10

KNOWLEDGE:

Two (2) years of college, including science courses. Good reading and writing skills required for documentation and communication of discrepancies and other problems to Supervisor.

15

EXPERIENCE:

Six (6) months of experience as a waste material sampler, or 3 to 4 years of related work experience in similar industry.

20

COMPLEXITY OF DUTIES:

Works independently with a wide range of procedures. Makes decisions regarding waste material, referring only unusual cases to Supervisor. Responsible for location of all materials in all stages of processing and verification of all waste material released for disposal.

25

SUPERVISION RECEIVED:

Plans own work to meet production objectives. Unusual problems or discrepancies are referred to Supervisor.

EFFECT OF ERRORS:

Errors could cause improper staging or disposal resulting in safety hazard and possible fines due to non-compliance with EPA regulations. Improper handling of material in hold section could result in poor customer relations if material cannot be located for return or disposal.

30

CONTACT WITH OTHERS:

Daily contact with Lab personnel, members of work group, and outside truckers.

35

CONFIDENTIAL DATA:

Occasional access to customer contracts or COD checks accompanying shipment.

40

MENTAL OR VISUAL DEMAND:

Close mental and visual attention required at all times. Close attention to detail required when handling paperwork, marking drums and performing final drum counts.

5

WORKING CONDITIONS:

Continuous close contact with waste material. Must wear protective suit and respirator at all times. Position requires standing 90% of time. Continual exposure to weather elements and dust used to stabilize drum material.

10

PHYSICAL DEMAND:

Occasional lifting and frequent climbing onto trucks to verify drum count.

15

[End of Appendix H-1]

APPENDIX H-2

SECTION H

EXAMPLE OF TYPICAL TRAINING COURSES

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EXAMPLE OF TYPICAL TRAINING COURSES

Course Code	Course Name	Hours
A1.000	24 Hour Orientation	24.00
A1.001	Waste Annual Refresher	9.00
A1.002	Non-waste Annual Refresher	8.00
A1.100	Pre-24 Hour Orientation	8.00
A1.101	Initial Orientation	2.00
A1.110	Medical Surveillance	1.00
A1.120	Substance Abuse	1.00
A1.130	CWM Benefits	1.00
A1.135	Theft Policy	0.50
A1.137	Contract Compliance	1.00
A1.140	Peer Review Refresher Training	1.00
A1.250	Interviewing Skills	4.00
A1.300	PPE	2.00
A1.400	Health & Env. Awareness	1.00
A1.500	Regulation Awareness	1.00
A1.600	RCRA Overview	1.50
A1.700	State & Local Regulations	1.00
A1.800	Site Safety	2.00
A2.000	Emergency Response & Prep.	1.50
A2.100	Basic Firefighting Concepts	1.00
A2.200	Evacuation Simulation	1.00
A3.000	Hazard Comm. - Right To Know	2.50
B1.000	Train/Trainer	2.00
B1.150	Safety Procedure #31	1.00
B3.100	Respiratory Fit Test	0.50
B3.150	Decontamination	1.00
B3.200	Hearing Conservation	0.50
B3.300	Heat Stress	1.00
B3.400	Cold Stress	1.00
B3.450	Back Safety	1.00
B4.000	Vehicle Safety	1.00
B6.000	Emergency Equipment Care	1.00
B7.000	Phase I Regulations	0.50
B8.000	DOT Refresher	2.00
B8.050	Refrigerant Recovery Training	1.50

Course Code	Course Name	Hours
B8.100	Drum Handling	1.00
B8.101	Line Break	1.00
B8.110	Confined Space	1.00
B8.115	Confined Space Monitoring	1.00
B8.120	Grounding & Bonding	1.00

[End of Appendix H-2]

APPENDIX H-3

SECTION H

EXAMPLE OF A TYPICAL TRAINING COMPLETION LIST

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Chemical Waste Management, Inc. Training Completion List

Emelle Treatment Facility

Trainer name(s): _____

Signature(s): _____

Lesson: _____

Date: _____

Location: _____

Time: _____

The following people have attended this training session, which covers the following objectives:

Copies of all applicable materials/handouts/_____ were distributed to each attendee.
Successful completion of this course is indicated by the trainer's signature.

SAMPLE

(Optional)

Signature	Job Title	Print name	Social Security #

APPENDIX H-4

SECTION H

EXAMPLE OF TRAINING COURSES BY JOB TITLE

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Chemical Waste Management, Inc.
Training Courses by Job Title
for WST TRACKING SPEC/906 thru WST TRACKING SPEC/906

Job Title	Course Code	Course Name	Req Cmp	Req Frq	Hours
WST Tracking Spec/906	A1.000	24 Hour Orientation	FW	O	24.00
	A2.001	Waste Annual Refresher	DO	A	8.00
	A2.200	Evacuation Simulation	FW	A	1.00
	D6.000	Land Disposal Restrictions	PF	R	1.00
	DP1008	Operations Curtailment	PF	R	1.50
	DP1009	Waste Cont Mgmt	PF	R	1.50
	DP2015	Drum Handling Procedures	PF	R	1.50
	DP2017	Absentee Book/Calendar	PF	R	1.50
	DP2019	Avoiding Risks	PF	A	1.50
	DP2021	Moving Hold Drums	PF	R	1.50
	DP2023	Ensuring Compliance	PF	R	1.50
	DP2025	Categorizing/Segregating HH	PF	R	1.50
	DP2026	Drum Mgt Decon Procedures	PF	R	1.50
	DP2030	Wst Trk Procedures/Dr Process	PF	R	1.50
	DP2031	Processing & Testing D002	PF	R	1.50
	DP2809	Emerg Shutdown Proc TF#3	PF	A	1.50
	DP4011	Mats Storage by Compatibility	PF	R	1.50
	DP5005	Personnel & Vehicle Inspection	6M	R	1.50
	DP5006	Wearing personal ID's	PR	R	1.50
	DP6005	Positive Discipline	FW	O	1.50
	DP6012	Peer Review	FW	R	1.50
	DP9200	Labeling Off-Site Shipments	PR	R	1.50
	WMSR01	Sampling Module	PR	A	4.00

Number of Courses: 23

[End of Appendix H-4]