

ATTACHMENT 4

PERSONNEL TRAINING

4.A. OUTLINE OF TRAINING PROGRAM

- 4.A.I. Safety-Kleen shall provide training to all employees within the first six months of the employee's hire date with an annual review thereafter. Each employee involved in hazardous waste management shall be trained to operate and maintain the facility safely, and to understand hazards unique to his/her job assignment. The training given to each employee shall be reflective of his or her job duties and other responsibilities at the facility, and may include classroom, on-the-job and independent study modules.

4.B. DESCRIPTION OF THE TRAINING PROGRAM

- 4.B.I. Personnel training is provided through multiple sources, examples include: Branch Manager, Online Learning, Health & Safety and Environmental Managers, and the Safety-Kleen Training Department. Records of required personnel training shall be maintained at the facility and/or electronically in a format viewable at the facility. An example outline of the introductory and continuing training for facility employees is contained in Table 1-ATTACHMENT 4 and is the minimum required introductory and continuing training for facility employees. An example outline of the training for Branch Managers is included in Table 2-ATTACHMENT 4 and is the minimum required training for the facility Branch Manager.

4.C. INTRODUCTORY TRAINING

- 4.C.I. Introductory training shall be provided for all employees at the facility. The training shall include, as applicable, the topics described in R315-264-16(a)(3), the following topics relevant to each employee's duties or responsibilities at the facility, and any specific training for their job position as described in Condition 4.F. of this attachment.
- 4.C.I.a. The Waste Analysis Plan, ATTACHMENT 1.
- 4.C.I.b. The Contingency Plan, ATTACHMENT 2.
- 4.C.II. Introductory training shall be completed within six months after the date of employment or assignment to the facility, or starting a new position at the facility. Employees shall not work in an unsupervised position related to hazardous waste management until the introductory training requirements described in this section have been completed.

4.D. CONTINUING TRAINING

4.D.I. Employees at the facility shall receive refresher training annually to review the topics described in Condition 4.C. of this Attachment. The annual training shall also include updates on environmental regulations, an in-depth review of the Contingency Plan, and a review of RCRA inspection criteria.

4.E. TRAINING PROGRAM MANAGER QUALIFICATIONS

4.E.I. The training program shall be directed by an individual trained in hazardous waste management procedures. Qualified personnel shall provide training for employees. The following describes the specific qualifications for the training program manager and on-the-job instructors.

4.E.I.a. Training Program Manager

4.E.I.a.i. The Branch Manager or designee shall be responsible for managing the training program at the facility. The Branch Manager or designee shall possess experience or education in hazardous waste management, as well as the experience and qualifications necessary to train employees on the facility-specific operational issues.

4.E.I.b. On-the-Job Instructors

4.E.I.b.i. The Branch Manager or designee shall perform on-the-job training for employees. In either case, the instructor shall be skilled in the current methods of facility operation and duties of the job.

4.F. TRAINING APPLICABLE TO JOB TASKS

4.F.I. The training program is designed to familiarize employees with the emergency procedures and equipment, environmental regulations, and record keeping procedures relevant to the jobs they perform. The program shall ensure that all facility personnel will be able to respond appropriately to an emergency at the facility. Job duties and specific training applicable to each job title at the facility are described below.

4.F.I.a. BRANCH MANAGER

4.F.I.a.i. The Branch Manager at the facility shall be responsible for the compliance, operation, and maintenance of the facility along with directing sales activities. This position shall be responsible for assuring that the facility operates within the requirements of the permit and applicable regulations and shall be responsible for acting as the emergency coordinator during implementation of the contingency

plan. He/she conducts required personnel training or may designate a qualified alternate. The Branch Manager will possess the training described in Table 2- ATTACHMENT 4.

4.F.I.b. SALES AND SERVICE STAFF

4.F.I.b.i. Safety-Kleen sales and service personnel pickup wastes from Safety-Kleen customers (as well as sales related duties) and are responsible for assuring that waste is picked up in compliance with the Waste Analysis Plan, ATTACHMENT 1 of this Permit. Sales and service personnel who are involved with sampling and analysis activities required under the Waste Analysis Plan shall be properly trained in performance of these duties. Specific training for sales and service personnel shall include at a minimum:

4.F.I.b.i(A). Applicable occupational health and safety requirements for workers at hazardous waste treatment, storage, and disposal facilities, including use of personal protective equipment;

4.F.I.b.i(B). Sampling protocol;

4.F.I.b.i(C). Methods for performing required testing (where applicable for on-site personnel); and

4.F.I.b.i(D). Record keeping requirements for activities required under this permit.

4.F.I.b.ii. Sales and service personnel shall also be trained in manifests, facility inspection records, and training records. Sales or service personnel may also be trained to conduct the facility inspections or act as an emergency coordinator during implementation of the Contingency Plan.

4.F.I.c. WAREHOUSE EMPLOYEES

4.F.I.c.i. The facility warehouse employees (e.g., Lead Material Handler/Material Handlers) are responsible for loading and unloading waste off the trucks, bulking waste when applicable, and maintaining the container storage areas (as well as the other facility maintenance duties) in accordance with the permit and applicable regulations.

4.F.I.c.ii. Warehouse employees shall be trained to maintain the service center and assist the other branch employees in their tasks. A warehouse employee may also be trained to conduct the facility inspections or act as an emergency coordinator during implementation of the Contingency Plan. Specific training for the warehouse employees shall include at a minimum:

4.F.I.c.ii(A). Applicable occupational health and safety requirements for workers at hazardous

waste treatment, storage, and disposal facilities, including use of personal protective equipment;

4.F.I.c.ii(B). Methods for performing required testing or acceptance of wastes as described in the Waste Analysis Plan, ATTACHMENT 1; and

4.F.I.c.ii(C). Record keeping requirements for activities required under this permit.

4.F.I.d. **ADMINISTRATIVE EMPLOYEES**

4.F.I.d.i. The facility's administrative staff, (e.g., Senior Branch Administrator/Branch Administrator) are responsible for providing support to the Branch Manager and the Service Representatives in their daily tasks. Administrative employees are also responsible for maintaining the facility files and other office duties as required. Administrative employees shall be trained in the proper record keeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they shall check it for accuracy and completeness and then process or file it as required. Additional training shall be overseen by the Branch Manager and shall be completed within six months of hiring.

4.G. TRAINING RECORDS

4.G.I. Training for facility personnel shall be documented in the facility operating record as hardcopy records or retrievable electronic files. 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. An up-to-date organization chart identifying all facility employees and their current job titles shall be maintained on-site at the facility or in a retrievable format for review.

TABLE 1-ATTACHMENT 4

**EXAMPLE INTRODUCTORY AND ANNUAL TRAINING TOPICS
FOR FACILITY EMPLOYEES**

- A. Environmental Regulation Update
- B. Part A and Part B Permit Requirements
- C. Waste Analysis Plan

Includes a review of the Part B permit; Sampling and analysis procedures (except for Branch Administrators); and record keeping.
- D. Preparedness and Prevention and Contingency Plan
- E. Contingency Plan and Emergency Procedures
- F. Annual Review of Training
- G. Facility Inspections
- H. Manifesting Requirements
- I. Spill Reporting (Includes a Review of SPCC Plan)
- J. Waste Minimization
- K. Storm Water Pollution Prevention Plan

TABLE 2-ATTACHMENT 4
EXAMPLE TRAINING PLAN OUTLINE - BRANCH MANAGER

Branch Manager Training:

Classroom training for the Branch Manager includes the following:

A review of the Part B permit and Utah Hazardous Waste Regulations including:

Part A Application

Waste Analysis Plan (includes training in sampling and analytical methods)

Preparedness and Prevention Plan

Inspection Plan, including identification of malfunctions, deteriorations, or other problems at the site

Closure Plan and Financial Assurance Requirements

Training Plan

Reviewing of warehouse and secretary responsibilities

Orientation and training of branch personnel

Contingency Plan training, including:

Spill simulation, response, and spill reporting

Fire and explosion procedures

Shutdown of operations

Local emergency information

Local authority information

Emergency equipment, including

Use

Inspection

Repair

Replacement

Operating Procedures, including

Tank and Container Management procedures

Solvent scheduling

Inventorying

Health and Safety, including

OSHA training and reporting

Manifesting procedures and Land Ban Notifications, including

Transportation licensing