

PERMIT ATTACHMENT F PERSONNEL TRAINING PLAN

F.1 INTRODUCTION

The purpose of training is to familiarize employees with environmental regulations, records, and emergency procedures so that they can perform their jobs in the safest and most efficient manner possible. This training program is designed to ensure that facility personnel can respond effectively to emergencies by familiarizing them with waste management emergency procedures, emergency equipment, and emergency systems. All employees shall receive basic training on Hazard Awareness and the Facility Contingency Plan (Permit Attachment D). The level of training an employee receives will be based on the employee's level of involvement in hazardous waste management.

Each employee shall be trained to operate and maintain the facility safely, and to understand the hazards unique to hazardous waste management. This section contains information on Facility personnel and trainers, job descriptions, training outlines and training record forms. All employees at the Advanced Chemical Treatment LLC facility shall have training that satisfies the requirements of 40 CFR § 264.16. An employee shall not work in an unsupervised position until he or she has received proper training as outlined in Table F-2 (Outline of RCRA Training at the Facility).

F.2 ORGANIZATION STRUCTURE AND JOB DESCRIPTIONS

The Facility office shall provide a training program that shall be executed annually. The training program shall be directed by personnel trained in hazardous waste management procedures and shall include instruction on hazardous waste management for facility personnel that is in accordance with 40 CFR § 264.16(a). Job descriptions may change as business needs dictate. A list of employees, their job titles, training, and job functions shall be maintained in the Facility Operating Record.

F.2.1 Operations Manager

The Operations Manager (or designate) is ultimately responsible for the operations at the Facility. The sales representatives, administrator, and Material Handler report to the Operations Manager and he in turn must provide the training and materials necessary for the facility employees to execute their duties. With respect to environmental compliance, the Operations Manager must:

- keep the service center clean and orderly.
- execute or designate an employee to execute the daily inspection, keep a written log and remediate any problems.
- know the potential hazards of the material and waste handled on site.
- identify potential spill and fire sources and be able to execute the contingency plan.
- inform all employees of their environmental responsibilities.

- act as emergency coordinator and notify the proper authorities during an emergency, remediate the situation to the best of his abilities, and submit necessary reports to the corporate office.
- maintain all environmental records (such as manifests, training records and spill reports) on file.

F.2.2 Corporate Compliance Department

ACT's Compliance Department shall have personnel on staff who shall provide guidance to divisional and regional personnel for training, permitting, and other compliance issues for service centers in any given geographic area of the country.

F.3 DESCRIPTION OF THE TRAINING PROGRAM

Employee training shall be accomplished using classroom, electronic (i.e., video, e-Learning), written, and on-the-job methods. ACT shall prepare a training program for employees and the Service Center personnel and shall provide documentation that the program has been executed. Table F-1 below is a summary of the training that Facility personnel must take and the frequency of refresher training courses:

TABLE F-1: FACILITY PERSONNEL THAT MUST TAKE RCRA TRAINING

Job Title	Prior to Starting Work	On the Job Training	Refresher Training: Annually	When Regulations or Procedures Change
Operations Manager	X	X	X	X
Branch Administrator	X	X	X	X
Sales/Service Representatives	X	X	X	X
All Warehouse Employees	X	X	X	X

F.4 OUTLINE OF TRAINING PROGRAM

An employee shall be trained prior to starting work or as soon as they begin working (depending on their position) and shall take a refresher course annually thereafter. The environmental health and safety Department shall ensure that the Operations Manager or their designate has received adequate training to be able to train all branch personnel. Table F-2 (Outline of Personnel Training at the Facility) contains an example outline of the training program, which demonstrates that facility personnel are trained in hazardous waste management procedures.

F.4.1 Training of New Operations Managers

New Operations Managers shall be fully trained before they begin their new positions. This training shall occur on site, on-the-job, in off-site classroom training, electronic (i.e., video, e-Learning), written, and on-the-job methods. While being trained, a new Operations Manager shall review all environmental records and learn the recordkeeping requirements. These records shall include manifests, personnel records, training records, facility inspection records, and spill reports.

The training shall consist of an introduction to environmental law and a review of the operating Permit, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan, and Closure Plan. Additional time shall be spent reviewing past environmental compliance at the Operations Manager's facility. Environmental protection regulations unique to the State of New Mexico (e.g., the NM Hazardous Waste Act (HWA), NMSA 1978, 74-4-1 through 74-4-14) shall be discussed as well.

F.4.2 Training of New Branch Administrators

Branch administrators shall be trained in the proper record keeping procedures as soon as they begin working for ACT. Additional training shall be overseen by the Operations Manager and shall be done within six months of starting the job, if needed. It may include the items listed in the RCRA Training Plan Outline presented in Table F-2 (Outline of Personnel Training at the Facility), and include emergency response, shipping documents (including manifests), drum labels and other safety and environmental compliance issues.

F.4.3 Training of New Sales Representatives

New sales representatives shall be introduced to the operating Permit, which includes Waste Analysis Plan, Preparedness and Prevention Plan and the Contingency Plan. A representative also shall be trained as a designate for performing the facility inspection. Additional training shall be conducted in the form of classroom, electronic (i.e., video, e-Learning), written, and on-the-job methods. The representative shall become familiar with the Contingency Plan before he or she formally begins the new position. Training covering all the items listed in Table F-2 (Outline of Personnel Training at the Facility) shall be completed by newly hired employees within six months of starting work at the Facility.

F.4.4 Training of Newly Hired Hazardous Waste Management Personnel

All hazardous waste management personnel shall be trained to maintain the Facility and assist the other branch employees in their tasks. A material handler may also be trained as the designate for performing the daily inspection. Additional training may be provided in the form of videotape presentations, classroom, electronic (i.e., video, e-Learning), written, and on-the-job methods. The Contingency Plan shall be reviewed with the Operations Manager before the new hazardous waste management personnel formally begins his/her new position, and annually thereafter. The Material Handler must review the items listed in Table F-2 (Outline of Personnel Training at the Facility) within six months of hire.

F.4.5 Annual Training

Employees shall be trained on an annual basis using a program prepared and updated annually by Facility regional and/or corporate compliance offices and ACT's health and safety department. The annual training shall include updates on environmental regulations, an in-depth review of the Contingency Plan and a review of the Facility Inspection Plan.

Facility employees shall annually review the actions listed in Table F-2 (Outline of Personnel Training at the Facility). This review may be in the form of slide/tape, videotapes and/or classroom presentation, and a review and discussion of the operating treatment and storage facility permit. In addition, periodic memoranda on changes in environmental regulations shall be provided by the Facility's regional/corporate offices. The regulations shall be read and discussed by branch personnel.

F.5 TRAINING RECORDS

All employee regulatory training must be documented in the Facility Operating Record. Records of current employees shall be kept at the facility until closure. Some training documentation may be maintained electronically. Training records for employees shall be kept for 3 years after termination of their employment.

TABLE F-2: OUTLINE OF PERSONNEL TRAINING AT THE FACILITY

I. Introduction: Major plans to be discussed include the following items A through C:

- A. RCRA Contingency Plan and Preparedness and Prevention Plan
- B. Spill Plan Control and Countermeasures Plan
- C. Storm Water Pollution Prevention Plan

II. Measures that the Facility shall take to avoid sounding the emergency alarm

a. *Storage and release prevention measures*

i. Best Management Practices

- 1. Housekeeping
- 2. Keep the drum storage drum areas clean and clear
- 3. Pick up debris
- 4. Maintain adequate Aisle space
- 5. Ensure container security – lids kept on and secured
- 6. Waste shall not be stacked over 2 tiers high

ii. Preventative maintenance

- 1. Daily/weekly inspections
- 2. Keeping containers closed. Check container integrity at all times.
- 3. Have Spill Equipment available at all times
- 4. Fire extinguishers shall be maintained and inspected as per schedule
- 5. PPE shall be worn by Facility personnel as required
- 6. First aid kits
- 7. Eye wash

iii. Security

- 1. Keep unauthorized / untrained people out of the area
- 2. Use the facility sign-in log
- 3. Keep doors closed and locked
- 4. Enforce the above measures listed in items 1 through 3 under Section iii.

III. Measures that the Facility shall take if the above practices fail, and a spill occurs

A. *Activation of the site Contingency Plan*

- i. Contact the Groups on Emergency response list.
- ii. Implement Emergency Plan/Coordinators role
- iii. Activate Response preparation.
- iv. Conduct the following response actions.
 - 1. Emergency shut-off switches
 - 2. Major/minor spills
 - 3. Fires
 - 4. Earthquakes
 - 5. Evacuation procedures
- v. Notification requirements

B. *Transportation Contingency Plan*

- i. Emergency response list
- ii. Response preparation
- iii. Response actions
- iv. Notification requirements