



# 5.0 Environmental Training and Tracking

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# 5.1 Training Requirements

Keys



Establish and maintain procedures to identify and track environmental training needs of all personnel who have responsibility or authority over activities that have significant environmental impacts.
[R 324.1505(2)(b) (vi)]

An EMS requires training of employees whose jobs can have a significant environmental impact. In reality, this is just a part of the training necessary to maintain an effective EMS. There are four main areas of training that are necessary, not only for an EMS, but for a facility.

- 1. Awareness training on the EMS purpose, how it functions, and the role of all employees in the system.
- Job training of employees on new procedures and work instructions developed for operations and activities of significant impact.
- 3. Job training on environmental compliance and pollution prevention.
- 4. Environmental, health and safety training that is required by law for your facility.

#### **EMS Awareness Training**

For an EMS to work, all employees must participate in the process. This begins with communication and education. Your managers and employees need to know what an EMS is and why your company is instituting such a system. Their buy in and commitment is necessary. Awareness training includes the following factors:

- Introduction to the EMS and the system components.
- Introduction to the environmental policy, development of the environmental program (aspects and impacts), control of operations and activities, emergency preparedness, communication, and self auditing.
- The importance of employee contribution and their role in the success of the system.

EMS training can be done internally by your own personnel or you may choose to hire an outside consultant to help you with training and/or system development. When choosing an outside trainer, look for a company that has both experience with EMSs and experience within your industry.



# 5.1 Training Requirements (cont.)

Keys



All the various types of training you want to do for your system need to be identified.

#### Job Training for New Procedures

Procedures and work instructions developed for operations and activities of significant impact could change the responsibilities of an employee. The employee needs to be trained on new procedures that affect their job. This could be very simple. For example, an employee could be routinely checking an operating temperature on a piece of equipment to assure efficient operation, but due to the EMS, the employee may now be required to log the temperature on a log form. The employee needs to be informed of the change in procedure, why it is necessary, how to fill out the log form, and what to do with the completed log forms.

Training for new procedures and work instructions is best done by a direct supervisor or by someone knowledgeable about the operation/activity. In cases where environmental monitoring or environmental requirements are being added to work instructions, the best person to do the training would be the environmental manager or the person overseeing that environmental requirement.

#### Job Training for Compliance

Special training may be necessary for environmental compliance and pollution prevention. Environmental awareness needs to become part of everyone's job. Some procedures for your system may only be for environmental activities in which employees need to be trained. Some compliance issues may not be directly related to normal work procedures but your employees (not just environmental staff) need to be aware of the environmental impact of their actions, and also be informed to look for pollution prevention, waste minimization or other environmental opportunities.



# 5.1 Training Requirements (cont.)

<u>Environmental</u>, <u>Health and Safety training</u> Environmental, Health and Safety (EH & S) training can include the following:

- Hazard Communication and Employee Right-to-Know,
- Emergency response plans and procedures,
- Hazwoper training,
- Storm water training,
- Health and safety training. (e.g., lockout/tagout, confined space, etc.)

Some of the environmental, health and safety training can be included with the training for procedures and new work instructions. Training for Hazwoper, OSHA requirements, etc., must be done by certified trainers and documented to meet regulatory requirements. These must be stand-alone training sessions.



# 5.2 Development and Implementation of Training

Keys



Review the training offered for changes in requirements or updating the training for new procedures and work instructions.

For each training requirement, a program must be developed. The following actions should be included:

- Develop what topics must be covered in the training session.
- Determine who needs the type of training.
- Determine the frequency of training.
- Decide who is going to provide the training.
- Decide how to document and track who has been trained.

Also, consider that new employees will require a more intensive training effort. A training program or orientation just for new employees could be developed to cover EMS awareness, EH & S and to train them on procedures for their jobs.

Training does not have to be an all-day event. With EMS awareness, short (15 minute) presentations can be given at lunch or included at the end of safety meetings. Or, use videos that employees can sign out and watch at their convenience. Look at the training you need to do and decide on the most effective way to deliver it to your employees. So much the better if you can do training without disrupting facility operations.



# 5.3 Training and Tracking Responsibilities

Keys



- Assign responsibility
- Organize a tracking system
- Review training

Many facilities/companies have their Human Resources departments coordinate and track training. Or, the responsibility for tracking can be shared. Environmental training could be coordinated and tracked through the environmental or EH & S coordinator. Regardless of how you designate who handles what, make sure to:

- Assign a responsible individual or department,
- Organize a system to track training (e.g., by employee, by training type), and
- Develop a system to review training requirements.



# 5.4 Identify Training and Tracking

Keys



All the types of training you do for your facility employees can be included in your EMS, regardless of whether it is connected with a significant impact.

Identify the training you are currently providing to your employees and your training needs for the EMS. Create a list or table of the training requirements for your facility. Make sure to include the big four requirements.

- 1. Awareness training for the EMS.
- 2. Employee training for new procedures and work instructions developed for operations and activities of significant impact.
- 3. Job training on environmental compliance and pollution prevention.
- 4. Environmental, health and safety training that is required by law for your facility.

On the following page is an example table of training for Joseph's Forklift and Hauling Company. A blank table (Form 5.1) is provided for your use or you can create your own documentation table/system for training.

## **EXAMPLE 5.1**

# Joseph's Forklift and Hauling Company

# Training and Tracking Table

| Type of Training  | <u>Frequency</u>  | Requirement                                     | <u>Trainer</u>                          | <u>Trainees</u>                                |
|---|---|---|---|--|
| EMS Awareness  System Intro.  Env. Policy  Env. Program  Control of Operations and Activities  Emergency Preparedness  Communication  Self Auditing | Annually/At hire  | EMS   | EMS Manager/<br>Outside Trainer         | All Employees/New<br>Employees                 |
| Corrective Action     Procedures and Work     Instructions for     Operations and     Activities  | Annually/as<br>necessary for new<br>employees and<br>operations and<br>activities | EMS   | EMS Manager/<br>Immediate<br>Supervisor | Operations/Shipping/<br>Warehouse<br>Employees |
| Air Permit – Boiler<br>Operations and<br>Monitoring   | Annually  | Required to maintain compliance with air permit | Operations<br>Supervisor                | Operations<br>Employees                        |
| Storm Water Pollution<br>Prevention Plan<br>(SWPPP)   | Annually  | SWPPP requirement                               | Storm Water<br>Operator                 | All Employees                                  |
| Spill Prevention, Control and Countermeasures (SPCC)  | Annually  | SPCC  | Emergency<br>Response<br>Coordinator    | All Employees                                  |
| Solid and Hazardous<br>Waste Management   | Annually  | EH & S  | Operations<br>Supervisor                | Operations/Shipping/<br>Warehouse<br>Employees |
| Hazard Communication/<br>Employee Right-to-<br>Know   | Annually  | OSHA  | Operations<br>Supervisor                | Operations/Shipping/<br>Warehouse<br>Employees |
| <ul> <li>General Safety</li> <li>Lockout/Tagout</li> <li>Confined Space</li> <li>Personal Protective<br/>Equipment</li> </ul>                       | Annually  | OSHA  | Operations<br>Supervisor                | Operations/Shipping/<br>Warehouse<br>Employees |
| Fire Extinguisher<br>Use/Fire Response  | Annually  | OSHA  | Operations<br>Supervisor                | Operations/Shipping/<br>Warehouse<br>Employees |

# EXAMPLE 5.1 (cont.)

# Joseph's Forklift and Hauling Company

#### **Training and Tracking Table**

| Type of Training  | <u>Frequency</u> | Requirement | <u>Trainer</u>  | <u>Trainees</u>      |
|---|------------------|-------------|---|----------------------|
| New Employee<br>Orientation                                     | As needed        | Varies      | Adm. – Human<br>Resources/<br>Various competent<br>trainers | All New<br>Employees |
| Contractor Orientation  Environmental Safety Sign in / Sign out | As needed        | Varies      | Operations<br>Supervisor                                    | All Contractors      |

Approved by: Chris Joseph Date: August 20, 1999

### FORM 5.1

# EMS Training and Tracking Company: Date:

| <u>Type of</u><br><u>Training</u> | Frequency | Requirement | <u>Trainer</u> | <u>Trainee</u> |
|-----------------------------------|-----------|-------------|----------------|----------------|
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| Approved by: | Date: |
|--------------|-------|
|              |       |



# 5.5 EMS Procedure for Training and Tracking

Keys



Procedures for each training program/course can now be developed for each type of training you are going to be doing at your facility. A procedure for training and tracking should be developed for your EMS. The procedure needs to include:

- Identification of the types of training,
- Responsibility,
- Tracking of training, and
- Updating training requirements.

On the following page is a procedure for training and tracking for Joseph's Forklift and Hauling Company's EMS. Also, included for your review is an Environmental Training procedure for Wisconsin Electric - Presque Isle Power Plant. Review these examples and develop your procedure for your system documentation.

#### Joseph's Forklift and Hauling Company

# EMS Procedure No. EMS-4 Training and Tracking

#### I. Purpose

This procedure is to establish and maintain training and tracking procedures for Joseph's Forklift and Hauling Company.

#### II. Scope

This procedure for training and tracking contains provisions to identify, track and update training necessary for the EMS and facility operations.

#### III. Definitions

N/A

#### IV. Procedures

#### A. Identify Training Needs

Review training currently provided to employees. Training will be identified by the EMS manager in cooperation with staff handling any Environmental, Health and Safety requirements.

Training is to include the following:

- Awareness training on the EMS purpose, how it functions, and the role of all employees in the system.
- Job training of employees on new procedures and work instructions developed for operations and activities of significant impact.
- Job training on environmental compliance and pollution prevention.
- Environmental, health and safety training that is required by law for the facility, and
- New employee orientation.

A listing of training will be used as a reference for the EMS and to develop training modules. Who needs the training, frequency of training and the competent trainer to provide the training are to be designated and included in the listing.

#### B. Provide Training

Competent staff are to be assigned the responsibility for developing training programs/courses according to their expertise. Training can be a formal course with a defined scope/procedure or on-the-job training (e.g., new procedures and work instructions for operations and activities) as appropriate

for the training to be delivered. External trainers will be identified and used as necessary for training that requires a certified or expert trainer not on staff.

#### C. Tracking of Training

Documentation of employee training is to be maintained by Administration in the Human Resources Files. Each employee is to have a training history file.

Each employee must sign off, on the appropriate log form, on all training as it is received (EMS Training Form No. EMS 4-1). All log forms are to be returned to Administration (Human Resources) for updating of employee training files.

#### D. Updating of Training Requirements

The EMS manager in cooperation with staff handling any Environmental, Health and Safety requirements is responsible for reviewing and updating training.

#### V. Records

A listing of training/training courses for the EMS will be kept and updated as necessary for reference.

A listing of training received by each employee will be maintained by the Administration in the Human Resources Files.

#### VI. <u>Updates and Reviews</u>

Training and tracking practices will be reviewed and updated annually, or upon the addition of new environmental/legal requirements and process changes.

#### VII. Responsibilities

Updating and removal of training programs and procedures must be coordinated and approved by the EMS Manager.

#### VIII. Related Documentation

A listing of EMS training and tracking procedures will be maintained on file by the EMS manager.

Log forms for training. (EMS Training Form NO. EMS 4-1)

Administrative training files.

Written by: Jill Jones Date: August 27, 1999

Reviewed by: Chris Joseph Date: August 30, 1999

Issue Date: 8-30-99 Version #: 1

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# EMS Training Form No. EMS 4-1 Joseph's Forklift and Hauling Company Training Topic: EMS, New Procedures, or EH & S

| <u>Date</u> | <u>Training Module</u> | <u>Employee</u> |
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#### 8.0 ENVIRONMENTAL TRAINING

Date of Issue: 03/23/98

#### 8.1 **Purpose**

It is the company's policy that all employees receive adequate training to perform their duties in a safe and environmentally compliant manner.

The purpose of this procedure is to guide and track the environmental training that will help assure environmental regulatory compliance and maximum plant performance.

#### 8.2 Scope

This procedure outlines the basic environmental training requirements for employees of PIPP, including the types, content and frequency of training.

#### 8.3 **Procedures**

Specific activities and procedures involving staff training are outlined below.

- **Identifying Training Needs** Training needs will be identified by both PIPP and We Energies corporate environmental staff. Both the scope and depth of training appropriate to assure competency and compliance will be identified. The frequency of such training shall also be determined (e.g., original training, annual refresher, etc.) When necessary, a written outline of the content shall be prepared and used as guidance for any subsequent training.
- **Identification of Laws and Regulations Requiring Training** Corporate environmental staff, working in conjunction with plant environmental staff, will identify those laws and regulations (including permits) that require specific staff training to maintain regulatory compliance.
- **Providing Training** Training will be conducted by competent PIPP staff, corporate environmental staff, or internal/external training professionals. Some training may also be computer based training using materials tailored for a specific topic. On-the-job training will, in some situations, either complement or be the only training an employee receives on a specific subject if it is determined that this is the most appropriate method of training.
- **Assuring Competency** Formal tests or interviews will be used to determine the level of understanding and competency of individual staff members receiving training.
- Tracking Training Hours Tracking of training hours and course content will be the responsibility of the PIPP plant staff. These records will also become part of each employees personnel record.

Baseline environmental training courses and content are outlined in Table 8-1.

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#### 8.4 Responsibilities

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The PIPP Plant Manager is responsible for assuring that employees are adequately trained and competent. The Plant Manager will be supported in this effort by the Human Resources Team Leader, the Human Resource (HR) Specialist/Training Consultant, and the corporate environmental team leaders.

The HR Consultant/Safety Training and We Energies corporate and PIPP environmental staff will jointly determine the content of all environmental training courses and materials.

An annual evaluation of environmental training needs will be conducted by the HR Consultant/Safety Training and the PIPP/We Energies environmental staff. The results of this evaluation will be communicated to the Plant Team Leader and the PIPP Environmental Advisory Committee for review and approval.

#### 8.5 Documentation

All environmental training documentation shall be maintained at the plant by the HR Consultant/Safety Training. This shall include:

- Training course content, including frequency, length of training, and target plant groups
- Individual training records
- Regulatory or other documentation that demonstrates or requires the training.

All significant changes or additions in training program courses, materials or frequency shall be approved by We Energies corporate environmental staff and be documented in plant files.





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#### Table 8-1

# Presque Isle Power Plant **Environmental Training**

| Course                                       | Frequency | Hours <sup>1</sup> | Description & Target Group   |
|--|-----------|--------------------|--|
| Air Quality – Title V Permit Operations      | Biennial  | 2/2                | Overview of key air quality operations concepts applicable to all Fossil Operations fossil-fuel facilities. Contents include: air quality legal and regulatory background, basic regulatory requirements, acid rain regulations and emission trading, control requirements and technologies, new and proposed requirements, physical and operating changes, FO procedures, work group applications, and balanced business scorecard. Detailed plant-specific training on the operational compliance requirements of the newly issued (or proposed) Title V permits, including compliance demonstration requirements for key parameters and system components, overall operating limits, monitoring (including test methods and procedures), excess discharge reports, corrective action, compliance assurance monitoring, recordkeeping, annual compliance certification, plant team and individual responsibilities, environmental staff team responsibilities, internal communication and notification, and legal requirements and liabilities of We Energies and plant staff  Target Groups:  Management team (all)  Engineering  Environmental  Operations  Electrical and E&C (Electronics and Controls)  Fuels |
| Air Quality — Continuous Emission Monitoring | Biennial  | 3/3                | Review of both general and specific CEM systems maintenance and operations, including: overview of Clean Air Act and Acid Rain and related provisions driving the CEM systems, contents of QA/QC Manual and Users Manual, roles and responsibilities of plant staff, routine maintenance procedures and commonly encountered problems and solutions, data diagnostics and software issues, data capture, documentation and recordkeeping, review and reporting, and internal communications.  Target Groups:  Environmental (all)  E&C Technicians  Leaders — Electrical Maintenance  Chief Engineer  Senior Engineer — Electrical  Engineer   |
| NPDES Operations                             | Annual    | 2/2                | Overall training covering wastewater treatment and related operations under the NPDES permit. Includes permit overview, monitoring, basic chemistry, wastewater treatment system operations, QA, recordkeeping, reporting, roles and responsibilities, commonly encountered conditions and solutions, and communications.  Target Groups:  Environmental (all)  Leader — Chemical  Integrated Production Team Leader  Leaders — Operations  Lab Analysts  Water Plant Operators  Chief Engineer  |
| Solid and Hazardous<br>Waste Management      | Annual    | 1 / 1              | Comprehensive solid and hazardous waste management training for FO plants, including definitions of solid and hazardous waste, hazardous waste identification,   |

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 $<sup>^{1}</sup>$  Hours refer to number of hours required for initial training and refresher training, respectively.





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| Course   | Frequency | Hours <sup>1</sup> | Description & Target Group   |
|--|-----------|--------------------|--|
| Training   |           |                    | accumulation and storage, commonly generated waste streams and their proper management, labeling and manifesting, recordkeeping and reporting, used oil management and recycling, small solid and hazardous waste stream management, lead and cadmium waste management, mercury management, pollution prevention (P2) and waste minimization, recycling requirements and practices, approved vendors and disposal facilities, commonly encountered issues or problems, and communications. |
|  |           |                    | Target Groups:  • All  |
| TRI Reporting and Recordkeeping  | As Needed | 2/2                | Update and refresher on Toxic Release Inventory (TRI) data collection and recordkeeping requirements of EPA and WE internal policies and procedures. 1998 training will focus on findings resulting from initial TRI program rollout and shakeout of late 1997 and early 1998.   |
|  |           |                    | Target Groups:  Environmental (all)  Engineering (all)  Purchasing/Warehouse (all)  Leader — Fuels Maintenance   |
|  |           |                    | HR Consultant     Chief Engineer   |
| Asbestos Awareness   | Annual    | 1 / 1              | General introduction and overview of asbestos characteristics, usage, presence, and control. Objective is to create general appreciation and awareness of asbestos for the general plant population regardless of job responsibilities.  |
|  |           |                    | Target Groups:  • PIPP (all except: Asbestos Workers, Asbestos Inspectors, Asbestos Coordinators)  |
| Asbestos Control,<br>Class 3   | Annual    | 16 / 4             | 16-hour OSHA asbestos training course.   |
|  |           |                    | Target Groups:  Mechanical Maintenance (all)  Electrical Maintenance (all)  Fuels Mechanic (all)  Management (specific individuals)  |
| Asbestos Inspector   | Annual    | 24 / 4             | 24-hour OSHA asbestos training course.   |
|  |           |                    | Target Groups:  Lab Analysts (all)  HR Consultant  Engineer  Specialist — Engineering  Leader — Chemical   |
| Asbestos Supervisor  | Annual    | 40 / 8             | 40-hour OSHA asbestos training course.   |
|  |           |                    | Target Groups:  Specialist — Engineering  Leader — Mechanical Maintenance  |
| First Responder<br>Awareness  [ Spill Prevention,<br>Control and Counter-<br>measures (SPCC) ] | Annual    | 1/1                | 2-hour initial Hazwoper general awareness course covering a general understanding of hazardous substance and associated risks as per 20 CFR 1910.120(a)(6)(i). Plant-specific emergency response and clean-up procedures for oil spills, including: internal notifications, sampling and testing, collection and handling of contaminated materials, agency notification and follow up, recordkeeping and reporting requirements, labeling and storage, transportation and disposal.       |





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| Course  | Frequency      | Hours <sup>1</sup> | Description & Target Group  |
|---|----------------|--------------------|---|
|   |                |                    | Target Groups:  PIPP (all except: Emergency Coordinators, First Responders Operations, Haz Material Technicians, Haz Material Specialist, and Hazwoper Incident Commander)      |
| First Responder,<br>Operation                   | Annual         | 8 / 4              | 8-hour Hazwoper training on initial response to hazardous substance spills as per 29 CFR 1910.120(q)(3)(ii).  |
|   |                |                    | Target Groups:  Operations - A Operators  |
| Hazardous Material<br>Technician                | Annual         | 24 / 8             | 24-hour Hazwoper training on proper response to hazardous substance releases as per 29 CFR 1910.120(q)(3)(iii)  |
|   |                |                    | Target Groups:  Lab Analysts  Water Plant Operators  Leader — Chemical  |
| Hazwoper — On-<br>Scene Incident                | Annual         | 24 / 8             | 24-hour Hazwoper training on proper response and management hazardous substances releases as per 29 CFR 1910.120.   |
| Commander                                       |                |                    | Target Groups:  |
|   |                |                    | • Emergency Coordinators  |
|   |                |                    | Specialist — Environmental     HR Consultant  |
|   |                |                    | Plant Team Leader   |
|   |                |                    | Integrated Production Team Leader   |
|   |                |                    | Leaders — Operations     Resource Coordinator   |
|   |                |                    | Leader — Personnel Services   |
|   |                |                    | Chief Engineer  |
| Hazwoper —<br>Hazardous Materials<br>Specialist | Annual         | 40 / 8             | 40-hour detailed Hazwoper training for responding and managing hazardous substances release events as per 29 CFR 1910.120(q)(3)(iv).  |
| Specialist                                      |                |                    | Target Groups:  |
|   |                |                    | Emergency Coordinators  |
| Lead Awareness                                  | Annual         | 2/2                | Two-hour general lead awareness training for all facility employees that may encounter lead in their jobs as per 29 CFR 1910.62.  |
|   |                |                    | Target Groups:  • PIPP (all except: Lead Worker, Leader Inspectors, Lead Assessor)  |
| Lead Worker                                     | Annual         | 32 / 8             | 32-hour lead training course for those staff that may be responsible for the testing, control and removal of lead as part of their job responsibilities, as per 29 CFR 1910.62. |
|   |                |                    | Target Groups:  • Specific individuals from Mechanical Maintenance, Electrical Maintenance, and Fuels Maintenance   |
| Lead Inspector                                  | As<br>Required | 24 / 8             | 24-hour lead training course for those staff responsible for the sampling, testing, and determination of lead in the plant as per 29 CFR 1920.62.                               |
|   |                |                    | Target Groups:  |
|   |                |                    | HR Consultant   |
|   |                |                    | Leaders — Mechanical Maintenance  |





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| Course                         | Frequency      | Hours <sup>1</sup> | Description & Target Group   |
|--------------------------------|----------------|--------------------|--|
| Lead Risk Assessor             | As<br>Required | 16 / 4             | 16-hour lead risk assessment course for those staff assigned responsibility to evaluate the presence and potential hazardous associated with lead in the plant as per 29 CFR 1920.62.  |
|                                |                |                    | Target Groups:  HR Consultant Leaders — Mechanical Maintenance   |
| Cadmium Awareness              | Annual         | 4 / 1              | 4-hour general cadmium awareness training for those plant staff that may encounter cadmium as part of their jobs as per Michigan Rules R325.51880.   |
|                                |                |                    | Target Groups:  • PIPP (all except: Cadmium Worker)  |
| Cadmium Worker                 | Annual         | 24 / 8             | 24-hour cadmium training course for those staff that may be responsible for the testing, control and removal of cadmium-containing materials as part of their job responsibilities.  |
|                                |                |                    | Target Groups:  • Specific individuals from Mechanical Maintenance, Electrical Maintenance, and Fuels Maintenance  |
| Inorganic Arsenic<br>Awareness | Annual         | 4 / 1              | 4-hour general inorganic arsenic awareness training for those plant staff that may encounter inorganic arsenic as part of their jobs as per Michigan Rules R325.51622.   |
|                                |                |                    | Target Groups:  • PIPP (all except: Cadmium Worker)  |
| Ash Landfill<br>Operations     | Annual         | 4 / 1              | Training specific to proper loading, hauling and storage of ash, including management of the landfills. Addresses issues of permit requirements, including fugitive dust control, stormwater management, hours of operation, limitations and restrictions.   |
|                                |                |                    | Target Groups:  Fuels (all except Fuels Mechanics)  HR Consultant  |
|                                |                |                    | <ul> <li>Chief Engineer</li> <li>Integrated Production Team Leader</li> <li>Plant Team Leader</li> </ul>   |
| Ash Utilization                | Annual         | 2 / 1              | General overview of ash management and utilization practices including factors affecting ash utilization, beneficial use trends and projections, markets, contractual issues, transportation, power plant ash management issues, and regulatory controls.  |
|                                |                |                    | Target Groups:  Leader (Fuels)   |
|                                |                |                    | <ul> <li>Integrated Production Team Leader</li> <li>Leader — Operations</li> </ul>   |
|                                |                |                    | <ul><li>Plant Team Leader</li><li>Chief Engineer</li><li>Engineer</li></ul>  |
| Tank Management                | As Needed      | 2 / 1              | Regulatory and operation overview of the proper environmental management aspects of above-ground storage tanks. Course includes overview of WE tank management guidance, state and local regulatory requirements, environmentally sound operation, tank monitoring and inspection, monitoring and recordkeeping, common problems and solutions, and qualified service vendors. |
|                                |                |                    | Target Groups:  Lab Analyst (all)  |
|                                |                |                    | <ul><li>Fuels Mechanic (all)</li><li>Leader — Fuels Mechanic</li></ul>   |
|                                |                |                    | <ul><li>Operations (all)</li><li>Environmental (all)</li></ul>   |





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| Course                   | Frequency | Hours <sup>1</sup> | Description & Target Group   |
|--------------------------|-----------|--------------------|--|
|                          |           |                    | <ul> <li>Engineering (all)</li> <li>HR Consultant</li> <li>Leader — Chemical</li> <li>Chief Engineer</li> </ul>  |
| Stormwater<br>Management | As Needed | 1/1                | General training on stormwater management principles and requirements, including MDEQ regulations and guidance, Marquette County requirements, commonly experienced conditions and how to solve them, plant and landfill practices relating to stormwater, and where to ask for assistance.  Target Groups:  Leader (Fuels)  Environmental (all)  Specialist — Engineering  Leaders — Operations  Integrated Production Team Leader  Leader — Chemical  Chief Engineer |



# 5.6 Training and Tracking Completion Checklist

#### **Check Box** Have you identified your training needs? 1. Have you identified who will need the training? 2. Have you identified who will provide the training? 3. Have you identified how to track training? 4. Have you identified a review process for updating 5. training? Have you written a procedure for training and 6. tracking for your EMS?