

SECTION II.J
PERSONNEL TRAINING PROGRAM
Required Under 40 CFR Part 27014(b)c12

General Training

Training and safety awareness is taught at all levels within Dow on a regular basis to every employee in every department.

Environmental Operations (EVO) initiates training programs aimed at maintaining compliance with federal, state, and local environmental regulations for operations at the Landfill.

Employee awareness of environmental concerns at the Landfill is directed and taught by the Landfill Technical Advisor. The Technical Advisor is trained in hazardous waste management procedures and maintains the training program for Landfill personnel.

Transporters

Treatment/Disposal permits, straight bills of lading, or uniform hazardous waste manifests are required at the source of generation prior to material transport.

Road and Yard Service and In-Plant Services vehicle drivers are trained to deliver loads intact. Driver awareness, with respect to Landfill requirements, such as no transport during hazardous driving conditions caused by severe weather (e.g., heavy snow, ice, lightning, etc.), is taught by their respective supervisors, with Environmental Operations personnel present, as required.

Landfill

A training manual is written specifically for the Landfill based on the Landfill Operating License and federal, state, and local regulations. The Landfill Operator reviews the training program with the Landfill Technical Advisor. Operating instructions are updated as required.

Training Responsibilities

The Technical Advisor of the Landfill is responsible for operating personnel training. New employees successfully complete the training program within six months after the assignment to the Landfill, or to a new position at the Landfill, whichever is later. New employees will not work in unsupervised positions until they have completed the training program.

Personnel Training

Organization of Training Program

The hazardous waste training program for the Landfill is coordinated by the Landfill Technical Advisor. These activities include:

1. Overall training program content;
2. Direct responsibility for training new hazardous waste Landfill personnel and conducting annual training updates;
3. Maintain the training program attendance records for all Landfill personnel; and
4. Annual review of Landfill training program.

The training program content includes:

- a. Facility description;
- b. Regulatory and operating license conditions or limitations;
- c. Operating procedures and conditions;
- d. Emergency procedures, equipment and systems;
- e. Key conditions for automatic shutdown/shutoff of disposal activities;
- f. Use of emergency communications or alarm systems;
- g. Procedures to respond to possible fires, explosions and/or groundwater contamination incidents; and
- h. Inspection, repair, and replacement of emergency and monitoring equipment (which are also described in contingency plan).

Job Titles and Duties

General job titles and descriptions are listed in the following section to aide in describing the training program. Specific names of people and qualifications will be kept at the Landfill and be available for inspection.

Landfill Technical Advisor

- Ensures personnel are knowledgeable and qualified to work at the Landfill;
- Enforces safety and housekeeping program;
- Ensures inspections are conducted and complete;
- Enforces employee development and training program;
- Ensures waste material is managed in compliance with all EPA and State of Michigan rules and regulations;

- Performs assessments of performance compliance with identified programs, procedures, and license requirements;
- Develops waste handling contracts with generators;
- Develops Landfill operating disciplines;
- Identifies and ensures maintenance projects are carried out and completed;
- Functions as a manifest signer; and
- Maintains records.

Landfill Operator

- Ensures inspections are completed;
- Ensures records are maintained and generated;
- Ensures waste material is managed in compliance with all EPA and State of Michigan rules and regulations;
- May sign manifests as a backup for the Landfill Technical Advisor; and
- Ensures personnel training is complete.

Maintenance of Documents and Records

The following documents and records are maintained at the Landfill:

1. The job title of each position at the Landfill, related to hazardous waste management, and the name of the employee filling each job.
2. A written job description for each position. The job description includes: the requisite skill, education, or other qualifications, and duties of employees assigned to each position.
3. A written description of the type and amount of both introductory and continuing training given to each person filling the position listed in number 1 above.
4. Records that document that the training or job experience required to perform the job has been given to, and completed by, Landfill personnel.

Current employees' training records are maintained until closure of the Landfill. Past employees' records are maintained for three (3) years after they leave their position.

Operator training includes classroom instruction, on-the-job training with experienced operators, and frequent discussions with the Landfill Technical Advisor. This includes instructions on job duties, contingency and emergency plans, inspection procedures, maintenance procedures, a discussion of emergency shutdown situations, communication and alarm systems, response to fires, leaks, explosions or spills, and a review of the training manual and safety policies.

The classroom training program consists of general information about the Landfill, specific information for Landfill operations, maintenance, inspections, records and recordkeeping, safety, industrial hygiene, and facility contingency plan and emergency procedures.