

Attachment 3
Personnel Training Program

Section 6

Training Plan

Personnel Training

Appendix I – SOP Template

Appendix II – JSA Form

Appendix III – Training Courses

Appendix IV – Training by Position

Appendix V – Training Certificates

Appendix VI – Standard Operating Procedures

TEMPLATE A10 - PERSONNEL TRAINING

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of the Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), R 299.9501, R 299.9605 and Title 40 Code of Federal Regulations (CFR) §§264.16 and 270.14(b)(12), establish requirements for personnel training programs at hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application template addresses requirements for a personnel training program at the hazardous waste management facility for the Petro-Chem in Detroit Michigan. This template includes personnel training requirements for construction permits and operating license applications. The information included in the template demonstrates how the facility meets the personnel training requirements for hazardous waste management facilities.

Operating License Applicant:

Construction Permit Applicant:

R 299.9605 Personnel Training Program

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This template is organized as follows:

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AIO.A CONTENT OF INTRODUCTORY AND CONTINUING EDUCATION TRAINING PROGRAMS

[R 299.9605 and 40 CFR §264.16(a)]

Petro-Chem Processing Group of Nortru, LLC, (PCPG) has a comprehensive training program which is designed to provide employees with the skills and knowledge needed to fulfill their obligations under PSC's EHS program and all federal, state and local regulatory requirements.

The training program has been divided into two major categories:

1. Regulatory:
Training specifically required by federal, state or local regulations, permits or licenses.
2. Job Specific
Training required within specific jobs that are directly related to operations or equipment within Petro-Chem. SOPs are utilized for initial job awareness training and on the job training (OJT).

Within these categories, the required skill level has been classified into 4 levels:

Level I: Basic Awareness: Basic understanding of the topic and associated policies and corporate objectives and targets.

Level II: Job Knowledge: Basic Awareness plus a more comprehensive knowledge of associated policies and corporate objectives and targets as well as facility objectives targets.

Level III: Work Without Assistance: Job Knowledge plus enhanced knowledge of the topic that is sufficient to enable the employee to work independently.

Level IV: Able to Train: Work without Assistance plus 1-year continuous working experience within the topic; complete understanding of the topic and possesses internal training certification authority

Training in each topic and to each classification level will be dependent on the job classification based upon the training needs.

Standard Operating Procedures (SOP's)

When a particular job or task is routine to the effect that there is no day to day change in the hazards or risks, an established and approved SOP is utilized. SOPs are to be reviewed by management and updated as required. See Appendix I (Form SOP-001) for the SOP Template. SOPs will form the basis of initial awareness training, OJT and competency evaluation. Copies of SOPs must be readily accessible to workers. See Appendix VI for Petro-Chem Standard Operating Procedures.

Specific health and safety issues will be addressed through the use of the Job Safety Analysis (JSA). See Appendix II for the JSA template.

Job Safety Analysis (JSA)

The JSA worksheet is a proactive approach to injury prevention and involves a pre-job discussion with all applicable Operators of the potential risks associated with various processes and the preventive measures in place to eliminate/minimize risks.

The JSA elements to be incorporated will include:

1. The JSA will be completed for each process conducted at Petro-Chem;
2. Each item identified on the JSA work will be reviewed for applicability and then reviewed with each affected employee;
3. All affected employees will be trained on the appropriate JSA prior to commencement of each process;
4. A JSA will be performed at least monthly with each affected employee prior to commencement of a process (pre-job or tailgate meeting) as part of the on-the-job training (OJT) and competency testing;
5. A new JSA will be completed and reviewed with each affected employee for every extraordinary material type introduced at the Facility prior to receipt of the material. An extraordinary material will include all IDLH, DOT packing group one material and highly reactive material.
6. A JSA will be performed prior to commencement of each activity at the Facility that requires:
 - a. Hot Work Permit (HWP)
 - b. Confined Space Permit (CSP)
 - c. Lock out Tag out (LOTO)
 - d. Subcontract Personnel
7. The JSA must be updated to reflect any changes in hazards or conditions as necessary;
8. Audits and/or inspections required by Supervisors or designate prior to commencement of a process or while performing a process must be documented on the JSA Form;

A10.A.1 Outline for Introductory Training Program

[R 299.9605 and 40 CFR §§264.16(a)(1) and 264.16(d)(3)]

Introductory training will include 'General Employment Training Packet', 'RCRA Training Course and 24 Hour HAZWOPER Training Course – See Appendix III

A10.A.2 Outline for Continuing Education

[R 299.9605 and 40 CFR §§264.16(a)(1) and 264.16(d)(3)]

Continuing training includes HAZWOPER and RCRA Training refresher (min 8 hours). PSC will source further training courses to supplement required training for competent employees.

A10.B PERSONNEL SUBJECT TO TRAINING REQUIREMENTS

[R 299.9605 and 40 CFR §§264.16(a),(d)]

A10.B.1 Job Titles and Job Descriptions

[R 299.9605 and 40 CFR §§264.16(d)(1),(2)]

See Appendix IV for Petro-Chem Training Matrix for required training for each job title. Job descriptions are routinely updated and maintained in the employee file. An example of a typical job description is included in Appendix IV

A10.B.2 Description of How Training is Designed to Meet Actual Job Tasks

[R 299.9605 and 40 CFR §§264.16(a)(1) and (d)(3)]

Training includes in class instruction or CBT, practical training and competency evaluation. This training encompasses work instructions, safety & environmental precautions, visual observations and a quiz at the end of the training to ensure each task is completed in an environmentally safe and effective manner

A10.C FREQUENCY OF REQUIRED TRAINING

[R 299.9605 and 40 CFR §§264.16(b), (c)]

A10.C.1 Initial Training

[R 299.9605 and 40 CFR §264.16(b)]

Personnel must complete introductory training within six months of their hire date or assignment to a new position or area of responsibility. Employees may not work in unsupervised positions until they have completed the required training.

A10.C.2 Continuing Education

[R 299.9605 and 40 CFR §264.16(c)]

Personnel must participate in continuing education training as required

A10.D TRAINING DIRECTOR

[R 299.9605 and 40 CFR §264.16(a)(2)]

The local EHS Specialist will co-ordinate all training for personnel and ensures training personnel have the minimum qualifications. The training will include a combination of computer based training (CBT), external training resources and in-house training by qualified specialists.

Qualifications of in-house trainers will include:

1. RCRA: 40HR HAZWOPER certification + minimum 5 years experience in hazardous waste operations + 2 years HAZWOPER training experience
2. PSC Orientation: minimum one year supervisory experience

3. OJT: Minimum qualification of Level IV (Able to Train)

A10.E DOCUMENTATION AND RECORD KEEPING REQUIREMENTS
[R 299.9605 and 40 CFR §§264.16(d) and (e)]

A10.E.1 Documentation
[R 299.9605 and 40 CFR §264.16(d)]

All training records will be maintained by the EHS staff and filed with the EHS Department.

A10.E.1(a) Job Titles and Names of Employees Filling Each Job
[R 299.9605 and 40 CFR §264.16(d)(1)]

Each training file will include the employee's name and job title

A10.E.1(b) Written Job Descriptions
[R 299.9605 and 40 CFR §264.16(d)(2)]

Written job descriptions for each job title will be placed in each employee training file

A10.E.1(c) Written Description of Type and Amount of Training Given to Each Position
[R 299.9605 and 40 CFR §264.16(d)(3)]

Each training course completed by each employee will include a copy of the material covered and the instructor information. See Appendix IV for the training of each position.

A10.E.1(d) Documentation That Training Has Been Given to and Completed by Facility Personnel
[R 299.9605 and 40 CFR §264.16(d)(4)]

Training certificates will be issued upon completion of training and placed in each employee file. See Appendix V for an example of the training certificate

A10.E.2 Record Keeping
[R 299.9605 and 40 CFR §264.16(e)]

All training records for current employees will be kept until closure of the facility. Records for former employees will be kept for five years from the date employment ceased.