

Attachment 3

Personnel Training Program

FORM EQP 5111 ATTACHMENT A10 PERSONNEL TRAINING

This document is an attachment to the Michigan Department of Environmental Quality's *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities*. See Form EQP 5111 for details on how to use this attachment.

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 EQ Resource Recovery, Inc. in Romulus, Michigan. The information included in the template demonstrates how the facility meets the personnel training requirements for hazardous waste management facilities.

This template is organized as follows:

- A10.A CONTENT OF INTRODUCTORY AND CONTINUING EDUCATION PROGRAMS
 - A10.A.1 Outline for Introductory Training Program
 - A10.A.2 Outline for Continuing Education
- A10.B PERSONNEL SUBJECT TO TRAINING REQUIREMENTS
 - A10.B.1 Job Titles and Job Descriptions
 - A10.B.2 Description of How Training is Designed to Meet Actual Job Tasks
- A10.C FREQUENCY OF REQUIRED TRAINING
 - A10.C.1 Initial Training
 - A10.C.2 Continuing Education
- A10.D TRAINING DIRECTOR
- A10.E DOCUMENTATION AND RECORD KEEPING
 - A10.E.1 Documentation
 - A10.E.1(a) Job Titles
 - A10.E.1(b) Written Job Descriptions
 - A10.E.1(c) Written Description of Type and Amount of Training Given to Each Position
 - A10.E.1(d) Documentation That Training Has Been Given to and Completed by Facility Personnel
 - A10.E.2 Record Keeping

A10.A CONTENT OF INTRODUCTORY AND CONTINUING EDUCATION TRAINING PROGRAMS

[R 299.9605 and 40 CFR §264.16(a)]

EQ Resource Recovery, Inc. (EQRR) provides several layers of training for all of its employees.

New employees are provided with introductory and awareness level training commensurate with their work activities during their first days of employment. Topics covered include RCRA, HAZWOPER, SPCC, and other environmental/safety/health related topics. New employees are

also provided with 24 or 40 hour HAZWOPER Classes prior to beginning work involving Hazardous Wastes.

Monthly training modules are also provided by EHS staff and/or other management staff to all current employees. The monthly modules cover various environmental, health, and safety topics that have been determined to be required/recommended based on the work being performed at the facility. There are additional training classes provided by third party instructors for the ongoing maintenance of required training elements. These include 8-Hr HAZWOPER Refresher, RCRA, DOT Hazardous Materials, and others.

These training elements specifically include instruction on hazardous waste management procedures for facility personnel designated as hazardous waste workers. Some of the areas covered within the training include:

- (1) The location, use, inspection and repairing of facility emergency equipment such as – fire extinguishers, spill control equipment and supplies, emergency eye wash and emergency showers;
- (2) The location, use, inspection and repairing of facility monitoring equipment such as - air and noise;
- (3) The operations and controls for automatic waste feed systems and processes, if applicable
- (4) The various forms and types of communication systems available on site such as – land phones, cell phones, and two-way radios,
- (5) Employee response to a fire or explosion – from using a fire extinguisher to calling the emergency response coordinator, to area evacuation;
- (6) Associate response to potential ground water contamination – from notifying the Emergency response coordinator to diking and berming to stop the spread, to knowing where the spill control products are located and having a knowledge of how to utilize them to control the spread of contamination;
- (7) Knowing the standard operating procedures necessary to shut down operations in their area if it pertains to their particular job function.

A10.A.1 Outline for Introductory Training Program

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

The initial training program will be covered and given as part of the NEW Employee or Job Transfer Safety Orientation. The Health and Safety orientation is completed on the first day the new or transfer employee is in the work area. The orientation includes the initial Contingency Plan and Emergency Response Procedures. The first portion of the EQ Safety Orientation Checklist (Appendix A-10.A) will be used to verify training by the Regulatory Specialist or his/her designee in fifteen areas. Item number 2 will be the site Initial RCRA Contingency Plan and Emergency Response Procedures.

The initial training program covers:

- Chemical Hazard Identification
- Working with Solvents
- Regulatory Overview with the seven actions facility personnel must take to minimize hazards in response to a fire or explosion or any unplanned sudden or non-sudden release of hazardous waste.
- General Requirements for Ignitable, Reactive & Incompatible Waste

- Preparedness & Prevention
- Contingency Plan Requirements
- Contingency Plan Purpose and Implementation Procedures for Fires/Explosions and Spills/Releases
- The various types and sizes of fire extinguishers on site are reviewed: ABC-BC-AB Dry Chemical, CO₂, and Fire hydrant locations.
- The various types of spill control equipment are identified; such as absorbents, shovels, brooms, recovery drums and squeegees. They are all described and their locations on site identified.
- The various means of communication available on the site are explained and identified: land phones, cell phones, and two-way radios.
- The decontamination procedures and equipment; Also included in decontamination are the locker room showers, the emergency eyewash stations and emergency eyewash and shower locations.
- First aid kit locations are identified.
- The personal protective equipment available, capabilities and locations are reviewed.
- The Evacuation Plan (40 CFR 264.52 (f))- procedures, evacuation routes and the meeting (rally) point are detailed and the locations pointed out on the site map.
- A copy of the latest list of facility Emergency Response Coordinators, their work addresses their phone numbers and pager numbers.
- A copy of the latest list of the Emergency Contact Agency's, regular phone number and emergency numbers

A10.A.2 Outline for Continuing Education

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

The topics to be covered will be the same as those in the initial training and will include any revisions or updates.

A10.B PERSONNEL SUBJECT TO TRAINING REQUIREMENTS

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

40 CFR 260.10 defines facility personnel as “all persons who work at, or oversee the operations of, a hazardous waste facility and whose actions or failure to act may result in noncompliance with the requirements of Part 264 or 265.” Individuals meeting this definition are considered to be hazardous waste workers.

A10.B.1 Job Titles and Job Descriptions

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

Job titles and job description with the training requirements for each hazardous waste worker position at the facility is maintained.

The job description includes outlining the purpose of the position, essential functions – critical duties/tasks, additional responsibilities and job qualifications.

A training record file with a copy of the job description and ongoing training records (sign-in sheets/certificates etc.) is maintained for all current employees.

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)]

After the initial training from the EHS Manager or his designee, the employee's immediate supervisor will conduct the job specific training for the actual job location and job tasks the employee will be assigned to perform. The training will consist of both verbal and hands-on training. The training will be completed during the first days the employee is in the work area.

The supervisor will explain:

- (1) The location, use, inspection and repairing of facility emergency equipment such as – fire extinguishers, spill control equipment and supplies, emergency eye wash and emergency showers;
- (2) The location, use, inspection and repairing of facility monitoring equipment such as - air;
- (3) The operations and controls for automatic waste feed systems and processes;
- (4) The various form and types of communication systems available on site such as – land phones, cell phones, and two-way radios;
- (5) Employee response to a fire or explosion – from using a fire extinguisher to activating the alarm, to calling the emergency response coordinator, to area evacuation;
- (6) Associate response to ground water contamination – from notifying the Emergency response coordinator to diking and berming to stop the spread, to knowing where the spill control products are located and having a knowledge of how to utilize them to control the spread of contamination; and finally
- (7) Knowing the standard operating procedures necessary to shut down operations in their area if it pertains to their particular job function.

A10.C FREQUENCY OF REQUIRED TRAINING

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

After the initial training each employee is required to attend an update of the training program every 12 months.

A10.C.1 Initial Training

[R 299.9605 and 40 CFR §264.16(b)]

Training is initiated on the first days of employment with the new employee orientation. The training process continues until the employee has satisfied the requirements of the outline, this will be completed within the first six months of employment in a new position.

A10.C.2 Continuing Education

[R 299.9605 and 40 CFR §264.16(c)]

All hazardous waste worker personnel are required to take part in an annual review of the initial training covered in the training program.

A10.D TRAINING DIRECTOR

[R 299.9605 and 40 CFR §264.16(a)(2)]

The EHS Manager or his designee will conduct the training program. The qualifications used to demonstrate the knowledge of hazardous waste management procedures will be: Academic credentials – copies of certificates, training seminars, certifications, college degree, or train-the-trainer certification.

For instructional experience, the trainer's resume will be checked for experience. Certifications will also provide documentation.

To establish/demonstrate competent instruction skills, again the resume will be utilized and copies of training records reviewed. Interviewing and observations along with instructor critiques will be utilized.

The EHS Manager or their designee must have knowledge of the applicable subject matter. Course records and training background checks can verify this.

The new or transfer employee's immediate supervisor will have the opportunity to conduct the hands-on training concerning the job specific subject matter required. The supervisor will have had personal experience in the job functions. The individual must be able to verbally and physically demonstrate the job specific requirements for each position falling under their authority.

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

See Section A10.E.1

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

EQRR will maintain the following documents and records at the facility in paper or electronic format:

- A list of current hazardous waste workers and their job title.
- A written job description for each hazardous waste worker job title is maintained. The hazardous waste worker job descriptions are reviewed and updated annually by the EHS manager and Operations Manager. When new job title/job descriptions are created at the facility it is the responsibility of the immediate supervisor to create a job description including the job specific functions, qualifications, and training requirements. A copy of the written job description will be given to each person filling a job title listed during their initial training;
- A description of the type and amount of training required for each hazardous waste worker job title will be maintained in association with the job description. The Health and Safety Manager will review the training requirements of each job description with on an annual basis.
- Records including certificates and sign-in sheets that document class attendance and/or competence for each individual are maintained in each individual's training record file. The current employees are maintained in the active file system and will be maintained until facility closure. Past employees files are archived in accordance with the EQ Record Keeping Program (at least three years).

A10.E.1(a) Job Titles and Names of Employees Filling Each Job

[R 299.9605 and 40 CFR §264.16(d)(1)]

See Section A10.E.1

A10.E.1(b) Written Job Descriptions

[R 299.9605 and 40 CFR §264.16(d)(2)]

See Section A10.E.1

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)]

See Section A10.E.1

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)]

See Section A10.E.1

A10.E.2 Record Keeping

[R 299.9605 and 40 CFR §264.16(e)]

See Section A10.E.1