

Section H

PERSONNEL TRAINING PROGRAM

(R 299.9501, R 299.9605, and 40 CFR 264.16, and 270.14(b)(12))

PERSONNEL TRAINING PROGRAM

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Appendices

*All Appendices listed below and referenced in this section are found in the Appendices
Tab of this application*

Appendix H- 1: EQD New Employee or Job Transfer Checklist

Appendix H- 2: EQD Job Titles and Job Specific Training for Current Employees

PERSONNEL TRAINING FOR SAFE FACILITY OPERATION AND MAINTENANCE

(R 299.9501, R 299.9605, and 40 CFR 264.16, and 270.14(b)(12))

H-1 Content of Introductory and Continuing Education Training Programs

(R 299.9605 and 40 CFR 264.16(a))

EQ completes all required compliance training for associates in a timely manner. In order to accomplish this, a comprehensive training plan is followed which encompasses safety, compliance with environmental standards and job-specific training such as adherence to the Waste Analysis Plan (WAP). One module found within this training plan is the training required under RCRA for persons who work at a hazardous waste facility. The requirements in 40 CFR 264.16 state that workers be given a baseline awareness of potential hazards at the facility and how to respond to an incident involving the release of waste, as referenced in the site Contingency Plan.

H-1a Outline for Introductory Training Program

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

EQD introductory training program for all new employees and employees who have transferred from another EQ location includes the training outlined in the Table below:

Training	Personnel Trained	Frequency
Advanced First Aid	ERT Selected Personnel	2 year
Aerial Work Platform (Operator's License)	ERT, and Maintenance	3 year
Arc Flash Awareness	EHS, and Maintenance	Once
Audiometric Testing	Chem-fix, Chem-pre, Maintenance	1 year
Automated External Defibrillator (AED)	ERT Selected Personnel	2 year
Back Safety/Safe Lifting	All	Once
Bloodborne Pathogen Training	All except office personnel	Once
Chemical Hygiene Plan	Laboratory	1 year
Cold Stress Training	All except office personnel	Once
Compressed Gas Cylinder Field Procedure	Approvals, and Drumdock	1 year
Compressed Gas Cylinder Training	Chem-pre, Drumdock, ERT, Laboratory, and Maintenance	PERIODIC
Compressed Gas Cylinder Awareness	All	PERIODIC
Confined Space Entry Trainer	Chem-pre, ERT, and Maintenance	3 year (ERT 1 year)

Training	Personnel Trained	Frequency
Confined Space Rescue	Chem-pre, and ERT	1 year
Confined Space Entry Awareness	All	PERIODIC
Contractor Safety	Managers	Once
CPR	ERT Selected Personnel	2 year
CPR Refresher	ERT Selected Personnel	2 year
Crane Operator Training (Trackmobile)	Maintenance	3 year
Crane Operator Training (Overhead - Railcar lid lifting)	Chem-fix, and Maintenance	PERIODIC
DOT Air Shipping / IATA	Job Specific	3 year
DOT HM126 General Awareness, and Function Specific	All except maintenance and laboratory	3 year
DOT HM232 Hazmat In-Depth Security Plan	All	3 year
DOT Rail	Job Specific	3 year
Emergency Action Plan Procedures	All	1 year
Ergonomic Injury Prevention Training	All	Once
Ergonomic Awareness	All	Once
Escape Respirator Training	Chem-fix, Chem-pre	Once
Eyewash & Shower Training	All except office personnel	Once
Eyewash & Shower Awareness	All	PERIODIC
Fall Protection Training	Chem-pre, ERT, Maintenance, and Receiving	PERIODIC
Fall Protection Awareness	All	1 year
First Aid	ERT Selected Personnel	2 year
First Aid & Medical Services Awareness	All	PERIODIC
Fire Extinguisher Training	All	1 year
Fire Suppression Training	Chem-fix, Drumdock, ERT, and Maintenance	Once
Forklift Training	Chem-fix, Chem-pre, Drumdock, ERT, and Maintenance	Once
Forklift (Operator's License)	Chem-fix, Chem-pre, Drumdock, ERT, and Maintenance	3 year
Forklift Awareness	All	PERIODIC
Gas Disable Switch for Oxidizer Processing	Chem-fix, ERT, and Maintenance	1 year

Training	Personnel Trained	Frequency
Hazard Communication Training	All	1 year
Hazwoper 24 Hour	All	Once
Hazwoper 40 Hour	ERT	Once
Hazwoper 8 Hour Refresher	All	1 year
Hearing Conservation Training	Chem-fix, Chem-pre, Drumdock, ERT, and Maintenance	1 year
Hearing Conservation Awareness	All	PERIODIC
Heat Stress Training	All except office personnel	Once
Heat Stress Awareness	All	PERIODIC
High Angle Rescue	ERT	1 year
Hot Work Training	Maintenance	1 year
Hot Work Awareness	All	PERIODIC
Hydrofluoric Acid First Aid	ERT	PERIODIC
Hydrofluoric Acid	Approvals, Chem-fix, Drumdock, ERT, Laboratory, and Receiving	Once
Incident Command System	ERT, Lead Operators, Managers, and Supervisors	1 year
Job Hazard Analysis (JHA)	All	Once
Ladder & Stairway Safety	All	3 year
Ladder & Stairway Awareness	All	PERIODIC
Lockout / Tagout Training	Chem-pre, EHS, ERT, and Maintenance	1 year
Lockout / Tagout Awareness	All	PERIODIC
Machine Guarding Training	Chem-fix, Chem-pre, Laboratory, and Maintenance	3 year
Machine Guarding Awareness	All	PERIODIC
New Employee Orientation	All	Once
Oxygen Administration	ERT	PERIODIC
Personal Protective Equipment Training	All	1 year
Personal Protective Equipment Awareness	All	PERIODIC
RCRA / Contingency Plan / SPCC	All	1 year
Respirator Fit Test	All personnel issued respirator	1 year

Training	Personnel Trained	Frequency
Respiratory Protection Training	All personnel issued respirator	1 year
Respiratory Protection Awareness	All	PERIODIC
Roll-off Training	Job Specific	Once
Safe Rigging Training	Maintenance	3 year
SCBA Training	Drumdock, EHS, ERT, and Receiving	1 year
Stop Work Authority	All	Once

Each employee is also given department specific training for their job function and area by their Supervisor. The training outline followed for new EQD employees “EQ New Employee or Job Transfer / Contractor Safety Orientation Checklist” is found in **Appendix H-1**.

H-1b RCRA Contingency Plan and Emergency Response Procedures

All incoming employees are provided training in the EQD Contingency Plan and Emergency Response Procedures in compliance with 40 CFR 264.16. This training is designed to meet actual job tasks in accordance with RCRA regulatory requirements in 40 CFR 264.16(a)(3). Facility personnel shall successfully complete a program of classroom instruction and on-the-job training that instructs them in performing their duties in a manner that ensures the facility’s compliance with the requirements of this part. The curriculum includes all the elements to fulfill both introductory and continuing training that will be given to each person filling a position related to hazardous waste management at the facility. A supervisor or manager provides new employees with instruction on job-related standard operating procedures and other on-the-job training. This program instructs the new employee in hazardous waste management procedures including Contingency Plan implementation relevant to the employee’s position.

H-1c Training Curriculum

The training program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems including:

- Procedures for using, inspecting repairing and replacing facility emergency and monitoring equipments
- Key parameters for automatic waste feed cutoff systems
- Communications or alarm systems
- Responses to fires or explosions
- Response to groundwater contamination incidents
- Shutdown of operations

Each affected person completes the program within six months after the effective date of these regulations or six months after the date of their employment or assignment to the facility. Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements of the RCRA Contingency Plan and Emergency Response Procedures.

H-1d Outline for Continuing Education

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

Reference the Table in section H-1a for the outline of training, personnel receiving the training, and the frequency of the training.

H-2 Personnel Subject to Job Training

(R 299.9605 and 40 CFR 264.16 (a), (d))

H-2a Job Titles and Description

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

The job title for each position at the facility related to waste management is found in **Appendix H-2**.

A written job description is provided for each position listed above. The description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, experience, education or other qualifications and responsibilities of employees assigned to each job position.

Job descriptions at EQD are found in **Appendix H-2**; **Appendix H-2** may not include all job descriptions; EQD will update and/or add job descriptions as necessary.

H-2b Description of How Training is designed to Meet Actual Job Tasks

(R 299.9605 and 40 CFR 264.16(a) and (d)(3))

A written description of the type, date and amount of both introductory training and continuing training that will be given to each person filling a given job position is found in **Appendix H-2** and a summary is provided in the Table located in H-1a. **Appendix H-2** may be changed or updated to reflect changes in RCRA, OSHA or EQD Management System training requirements.

H-3 Frequency of Required Training

(R 299.9605 and 40 CFR 264.16(b),(c))

H-3a Initial Training

(R 299.9605 and 40 CFR 264.16(b))

New employees and those employees who are reassigned to new positions are first required to review the written training program for the position they are to fill. Upon

completion, the personnel are given 40-hours of on-the-job training within one month of his/her hire date. No employee hired to work at EQD will work unsupervised prior to successful completion of the training program and all requirements specific to the job assignment.

H-3b Continuing Education

(R 299.9605 and 40 CFR 264.16(c))

All EQD facility personnel are required to meet annually for reviews and updates of initial RCRA/Emergency Response Program Training.

H-4 Training Director

(R299.9605 and 40 CFR 264.16(a)(2))

The facility Environmental Compliance Manager and the Health and Safety Manager, trained in hazardous waste management procedures directs the training. The Health and Safety Manager registers employees into training classes.

H-5 Documentation and Recordkeeping Requirements

(R 299.9605 and 40 CFR 264.16(d))

H-5a Documentation

(R 299.9605 and 40 CFR 264.16(d))

The EQD EHS Coordinator will maintain documents and records completed by EQD personnel, inclusive of the following information:

H-5a(i) Job Titles and Names of Employees Filling Each Job

(R 299.9605 and 40 CFR 264.16(d)(1))

Job Title for each position at the facility related to hazardous waste management and the name of the employee filling each job.

H-5a(ii) Written Job Description

R 299.9605 and 40 CFR 264.16(d)(2))

A written job description for each position should be consistent in its degree of specificity with description for other similar positions in the same company location or bargaining unit, but must include the requisite skill, experience, education or other qualifications and responsibilities of employees assigned to each position. It should be noted that EQD may update and/or add job descriptions as necessary.

H-5a(iii) Written Description of Type and Amount of Training Given to Each Position

(R 299.9605 and 40 CFR 264.16(e))

A description of the type and amount of training given to each position (by department) is found Table H-1a.

H-5a(iv) Documentation that Training Has Been Given to, and Completed by, Facility Personnel

(R 299.9605 and 40 CFR 264.16(d)(4))

EQD maintains records that document that the RCRA Emergency Response Program training and job experience have been successfully completed by facility personnel. This includes records of initial training and continued annual reviews including certificates of completion.

H-5b Recordkeeping

(R 299.9605 and 40 CFR 264.16(e))

Employee training records on current personnel are kept until closure of the facility. Training Records on former employees are kept for at least three years from the date the employee last worked at the facility. Such records are maintained on site.

Personnel training records may accompany personnel transferred within the same company to another location.

Appendix H- 1: EQD New Employee or Job Transfer Checklist

Appendix H- 2: EQD Job Titles and Job Specific Training for Current Employees