

**FORM EQP 5111 ATTACHMENT 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 Dow Michigan Operations in Midland, 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)]

The Dow Chemical Company (Dow) maintains an extensive series of training programs covering a broad spectrum of topics ranging from safety and plant operations to environmental management. These programs are designed to complement one another and to provide safety and efficiency for activities at Dow.

The Resource Conservation and Recovery Act (RCRA) requires facility personnel to successfully complete a program of classroom or computer-based instruction or on-the-job training that teaches them to perform their duties in a way that supports the facility's compliance with the requirements of hazardous waste management. This training

program is directed toward personnel working in areas that may generate hazardous wastes as a result of operations or who may have direct responsibility for managing hazardous wastes.

The required training material is covered and documented prior to an employee working unsupervised with hazardous waste activities.

A10.A.1 Outline for Introductory Training Program

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

An outline of the initial training program is provided below. Reviews of the training program are conducted periodically and updated as necessary. In addition to the initial Federal and State training outlined below, employees working in hazardous waste management jobs also complete facility specific training. While the training program used at the facility may vary over time, the minimum training elements will consist of the topics outlined in A10.B.2. Also, provided that the minimum topics defined in A10.B.2 are maintained, a permit modification will not be necessary for changes made to the program over time.

RCRA Initial Training Program Outline

Federal Training

I. Introduction

II. Lesson 1

- A. Reason for Training/Definitions
- B. Who Must Be Trained
- C. Know How to Comply
- D. How to Respond to Emergencies
- E. Training

III. Lesson 2

- A. Waste Classification
- B. Waste Characterization
- C. Land Disposal Restrictions & Contingency Plan
- D. Contingency Plan Requirements & Revisions

IV. Lesson 3

- A. Restrictions for Satellite Container Storage Areas
- B. RCRA Accumulation on the Label for a Container in a Satellite Storage Area
- C. Satellite Container Storage Area Time Limit
- D. Requirements for Plants Who Use Satellite Container Areas Exclusively
- E. 90-Day Container Storage Areas
- F. Labeling, Aisle Space and Inspection of a 90-Day Container Storage Area
- G. Uses for the Inspection Sheet
- H. RCRA Air Emissions Standards for Containers
- I. Tank System Integrity, Storage Time Limit and Labeling
- J. Secondary Containment for a 90-Day RCRA Tank System
- K. Secondary Containment Removing Liquids and Liner System
- L. RCRA Tank Inspection Requirements
- M. Deficiencies Found During Inspection
- N. Leaks/Spills from a 90-Day RCRA Tank
- O. Repair of a 90-Day RCRA Tank after a RCRA Reportable Spill
- P. RCRA Air Emission Standards for Tanks

- Q. Manifesting of Hazardous Waste
- R. EPA Reporting Requirements
- V. Lesson 4
 - A. Interim and Permitted Status Facility
 - B. Common RCRA Units in the Company Needing a RCRA Permit
 - C. Additional Requirements for TSDFs
 - D. 90-Day and Permitted Storage Units
 - E. Closure Process
 - F. Financial Assurance Requirements for TSDFs
 - G. Security Requirements for TSDFs
 - H. Management of Offsite Shipments and RCRA Permits
 - I. RCRA Corrective Action

State Training

- I. Introduction
- II. Lesson 1
 - A. Waste Classification
 - B. Code Waste
 - C. Michigan Non-Hazardous Waste
 - D. Michigan Liquid Industrial Waste
 - E. Containers
 - F. Labeling of Containers
 - G. Secondary Containment
- III. Lesson 2
 - A. Monthly Waste Report
 - B. Permit Conditions

A10.A.2 Outline for Continuing Education

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

Employees working in hazardous waste management jobs take part in an annual review of the initial training.

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)]

The following is a generalized table of Job Titles & Job Descriptions.

JOB TITLES	JOB DESCRIPTIONS
EH&S Delivery Leader	<ul style="list-style-type: none"> • Overall EH&S responsibility.
Production Leader Operation Leader	<ul style="list-style-type: none"> • Familiar with unit operations, unit layout, wastes managed and records. Responsible for ensuring corrective actions are completed and documented.
EH&S Delivery Specialist; Activity Coordinator; EH&S Delivery Technician; Run Plant Engineer; and/or Training Coordinator	<ul style="list-style-type: none"> • Ensure required inspections are performed and records maintained. • Develop and maintain Waste Characterizations. • Train personnel in proper handling of hazardous wastes. • Ensure that corrective action is completed promptly and properly documented.
Scheduler	<ul style="list-style-type: none"> • Waste logistics.
Plant Operator	<ul style="list-style-type: none"> • Operating process units. • Conducting and documenting required inspections, packaging, handling and shipping of wastes.
Unit Emergency Coordinator & Alternative Coordinator	<ul style="list-style-type: none"> • Thoroughly familiar with unit Contingency Plan & assist in emergency response activities.

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)]

Dow’s hazardous waste training is designed to provide employees with proper waste handling and emergency procedures to enable them to perform assigned duties and functions in a safe manner. The training program includes instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the position(s) in which they are employed. The training program is designed to provide knowledge so that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- Key parameters for automatic waste feed cut-off systems;
- Communications or alarm systems;
- Response to fires or explosions;
- Response to groundwater contamination incidents; and
- Shutdown of operations.

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)]

The initial training program will be completed within 6 months of employment for each employee with a hazardous waste related job. The length and extent to which initial training is required is defined by an employee's job description. Employees may not work in unsupervised positions until they have completed the training.

A10.C.2 Continuing Education
[R 299.9605 and 40 CFR §264.16(c)]

Employees working in hazardous waste management jobs take part in an annual review of the initial training.

A10.D TRAINING DIRECTOR
[R 299.9605 and 40 CFR §264.16(a)(2)]

The training program is designed by personnel trained in hazardous waste management procedures. Typically, RCRA training is administered for all personnel that manage and handle hazardous waste through online computer-based and on-the-job training.

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)]

Each hazardous waste management unit maintains a training plan describing what training is required for specific job descriptions. For each employee with a hazardous waste related job, a written job description and job title is maintained. Records of the following information are kept at each hazardous waste unit and are available upon request.

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

Job titles and names of employee(s) filling each job position related to hazardous waste management are maintained at each hazardous waste unit.

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

Job descriptions including requisite skill, education, or other qualifications, and duties of employees assigned to the hazardous waste management position are maintained at each hazardous waste unit.

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)]

Written description of the type and amount of both initial and continuing training that will be given to each person filling a hazardous waste management job position is maintained at each hazardous waste unit.

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)]

Records documenting that initial training, annual reviews, and other training outlined in the job position training requirements are maintained on-site. These records include the date, employee name, name of trainer (if applicable), and description of the training material covered.

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

Training records on former employees are maintained for 3 years from the date the employee last worked at the facility, and records for current employees are maintained at a minimum until the facility is closed.