

**FORM EQP 5111 ATTACHMENT A10  
PERSONNEL TRAINING**

This document is an attachment to Gage Products Company's (Gage), limited storage facility (Gage LSF) 2024 RCRA permit renewal application Form EQP 5111. 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 attachment addresses requirements for a personnel training program at Gage LSF located in Ferndale, Michigan. The information included in the attachment demonstrates how the facility meets the personnel training requirements for hazardous waste management facilities.

Sections listed in the table of contents below that are not applicable to the Gage LSF permit renewal are denoted with a strikethrough and the corresponding section has been deleted from the text. This attachment is organized as follows:

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## **A10.A CONTENT OF INTRODUCTORY AND CONTINUING EDUCATION TRAINING PROGRAMS**

[R 299.9605 and 40 CFR §264.16(a)]

Training is provided to Gage LSF personnel in order to teach them to perform their duties in a way that ensures:

- Proper operational, maintenance and inspection procedures are routinely implemented to minimize the possibility of a release of hazardous waste or hazardous waste constituents, which would threaten human health to the environment.
- Facility personnel are familiar with the provisions of the Contingency Plan/Emergency Procedures and are able to respond efficiently in the event of an emergency to minimize hazards to human health or the environment.

The introductory and continuing training programs are directed by a trained person in hazardous waste management procedures and who is familiar with the facility, its operations, and the emergency procedures and equipment described in both the Preparedness and Prevention Plan (Attachment A6) and the Contingency Plan (Attachment A7).

Table A10.A.1 provides an outline of the hazardous-waste management training program for Gage LSF personnel. The training program is designed to ensure that personnel safely handle hazardous waste. This program will be continuously updated and provided to each new, temporary, or re-assigned employee.

### **A10.A.1 Outline for Introductory Training Program**

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

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the hazardous waste regulations.

Introductory training will include General Employment Training Packet and RCRA Training Course. The below table summarizes the RCRA hazardous waste management program course information. Training syllabi are maintained by the training instructor and are available upon request.

**Table A10.A.1 1 Hazardous Waste Management Training Program**

1. Safety and Health
  - a. Health protection
  - b. Safety Procedures
2. Emergency Response (including 29 CFR 1910.120)
  - a. Emergency Evacuation and Emergency Control Program
  - b. Contingency Plan
    - (i) Emergency coordinator
    - (ii) Emergency procedures
    - (iii) Emergency communications/phone numbers and alarms
    - (iv) Location, maintenance, inspections, and use of emergency equipment
    - (v) Waste feed cut-off system
    - (vi) Spill Response
    - (vii) Fires and explosions

3. RCRA Standard for Hazardous Waste Management
  - a. Introduction to RCRA and Michigan Act 451 Part 111
  - b. Manifest Requirements
  - c. Record keeping and Reporting
4. Hazardous Waste Identification
  - a. General Properties of Hazardous Wastes
  - b. Hazardous Wastes Recycled and Stored at Gage LSF Products Company
5. Storage of Hazardous Waste
  - a. Use and Management of Drums
  - b. Use and Management of Tanks
6. Waste Handling Procedures
  - a. Manifest System
  - b. Other Records
7. Inspection
  - a. General Inspection Requirements
  - b. EP Toxicity Test & TCLP
  - c. Chemical Analysis Test Method
  - d. Inspection Logs
8. Analytical Procedures
  - a. Representative Sampling Method
  - b. Waste Analysis Plan

The training program covers both normal, everyday operating procedures plus emergency response procedures to be initiated in the event of a potential or actual spill, release, fire, or explosion that endangers public health or the environment. This training program addresses all the applicable sections of OSHA's Hazardous Waste operations and Emergency Response Standard (29 CFR 1910.120). The training program ensures that Gage LSF personnel not only manage hazardous waste in a safe manner every day but also can respond appropriately to an emergency situation at the facility. Those training elements of the program that address non-routine and emergency situation (such as unscheduled shutdowns and start-ups related to storms, power outages, fires, explosions, and spills) include:

- Procedures for locating, using, inspecting, repairing, and replacing facility emergency and monitoring equipment.
- Communication and alarm systems
- Response procedures for fires and explosions.
- Response procedures for spills.
- Shut down of operations and power failure procedures.
- Procedures for facility evacuation and the evacuation of nearby areas.
- Use of personal protective equipment.

In addition, the training program consists of instruction in the provisions of the Preparedness and Prevention Plan (Attachment A6), the Contingency Plan (Attachment A7), and with all applicable OSHA regulations. Instruction is supplemented with a written Spill Prevention Control and Countermeasures (SPCC)/Contingency Plan.

During the training program, employees are instructed on the hazardous nature of chemicals and chemical wastes in general, the purpose of RCRA and Michigan P.A. 451, and the importance of maintaining compliance with the hazardous waste regulations, the proper and safe handling and storage procedures of wastes, and emergency response procedures.

A walking tour of the facility, as part of the training program, identifies the location of all emergency equipment and structures available on the site that are specified in the SPCC/Contingency Plan.

The proper use and inspection of the numerous fire extinguishers located throughout the facility are addressed. Established procedures for the safe handling and use of the chemicals found at the facility are emphasized. On-the-job training is received by all personnel concerning activities appropriate to each job description.

#### **A10.A.2 Outline for Continuing Education**

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

Employees are required to review the training program on an annual basis and sometimes more frequently whenever that program has been updated.

The training program instructs employees on the provisions of the Contingency Plan; the hazardous nature of chemicals and chemical wastes in general; the purpose of RCRA and Michigan Act 64 along with the importance of complying with the hazardous waste regulations; the proper and safe handling and storage procedures for wastes; the proper and safe handling and storage procedures for ignitable, reactive, and incompatible wastes; emergency response procedures; and location of all emergency equipment and structures available on the site. On-the-job training is received by all personnel on activities appropriate to each job description.

#### **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)]

Table A10.B.1-1 provides the organization, names, and job title of personnel actively involved with hazardous waste activities at the Gage LSF. Detailed job titles and descriptions for the positions provided in the below table are maintained on site in the environmental files. An overall company organization chart is maintained at the facility.

**Table A10.B.1 Outline of the Hazardous Waste Organization Chart**

<b>Hazardous Waste Management Facilities Organization Chart</b>	
<b>Vice President, Operations*</b>	
Matthew McCoy	
<b>Director, EHS*</b>	
Brenna Harden	
<b>Environmental Manager*</b>	<b>Health &amp; Safety Manager*</b>
Andrea Seychel	Maureen Finn
<b>Production Manager, Remanufacturing*</b>	
Scott Johnson	
<b>Remanufacturing Operations*</b>	<b>Logistics Coordinator*</b>
Dave Meyer Mickey Fields Jason Fluary Anthony Dildy Ryan Rondan Byron Allen	Jacob Himick

\*Indicates personnel directly involved with hazardous waste 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)]

The hazardous waste training program is tailored to the specific job responsibilities of Gage LSF personnel. While all personnel involved in hazardous waste management are informed about the general requirements for proper waste management at the facility, such as the prevention of and response to spills, only those personnel directly involved in certain aspects of waste management are specifically trained in the details of certain tasks. On the job training further emphasizes the relationship of the job position to the content, details, and relevance of the training on hazardous waste management.

**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)]

No employee who has been hired to work at Gage LSF will work in an unsupervised position until that employee has received training on hazardous waste management procedures relevant to the job position held by that employee. All new employees will be trained in these procedures within six months of employment or assignment to the position.

**A10.C.2 Continuing Education**

[R 299.9605 and 40 CFR §264.16(c)]

Employees are required to review the training program on an annual basis and sometimes more frequently whenever that program has been updated.

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

Ms. Brenna Harden, Director of EHS and Community Relations, directs the hazardous waste training program for Gage LSF, with the assistance of her staff of trained professionals. Ms. Harden is very knowledgeable about the facility's operations and is familiar with the hazardous waste management regulations. More specifically, Ms. Harden has a B.S. degree in Chemical Engineering, has spent her professional career in the chemical industry, and has attended various training seminars on hazardous waste management regulations, Department of Transportation regulations, OSHA regulations, and personnel supervision.

**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)]

Records documenting the employee's training are maintained for each employee with their department supervisor and include the name of the employee, description and date of the training received, name of the instructor, and signature or stamp of the employee demonstrating that training was received.

**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 employee name associated with each job title has been provided in Table A10.B.1 above.

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

Written job descriptions for each hazardous waste job title listed in Table A10.B.1 have been placed in each employee training file. The job titles include requisite skill, education, or other qualifications, and duties of employees assigned to each position / job title.

**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)]

The written job description includes the type and amount of training required for each position. Typically, each job description requires completion of the entire new employee training, annual review, as well as job-specific on-the-job training. Job descriptions are maintained by the department supervisor and are available upon request.

**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)]

All hazardous waste and OSHA HAZWOPER training is documented in the individual employees training records maintained by their department's supervisor.

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

Training programs provided by the EHS team are maintained in the facility's EHS office and include the content of training and a sign-in sheet documenting participation. These training records will be kept until

closure of the facility for current employees and for three years from the termination date for former employees.