

ATTACHMENT 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 attachment addresses requirements for a personnel training program at the hazardous waste management facility for the Pharmacia and Upjohn Company LLC, a subsidiary of Pfizer Inc in Kalamazoo, Michigan. This attachment includes personnel training requirements for construction permits and operating license applications. The information included in the attachment demonstrates how the facility meets the personnel training requirements for hazardous waste management facilities.

A10.A CONTENT OF INTRODUCTORY AND CONTINUING EDUCATION TRAINING PROGRAMS

[R 299.9605 and 40 CFR §264.16(a)]

A10.A.1 Outline for Introductory Training Program

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

The goal of the personnel training program is to provide instructions for the proper management of hazardous waste and use of equipment involved in waste production/disposal and emergency response procedures. Training is scheduled and recorded electronically through a training database. Environmental professionals are responsible for developing and implementing initial and refresher training for employees at the facility. The training can be classroom training, computer based training, or on-the-job training.

The Environmental professional's training is supplemented by their attendance at outside technical seminars, conferences, webcasts, or other professional training.

Contractors directly involved with managing waste at the TSD are provided with training which includes the safe handling and management of hazardous waste and RCRA issues pertinent to contingency plan implementation. Specific requirements for the Pfizer Site Contingency Plan are provided by Pharmacia & Upjohn Co LLC.

A10.A.2 Outline for Continuing Education

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

Personnel, Environmental professionals, and contractors directly involved with managing waste at the TSD are refreshed on the requirements for the proper management of hazardous waste, use of equipment involved in waste production/disposal, and emergency response procedures annually.

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 job titles and job descriptions for each employee directly involved with the handling of hazardous waste are kept on file at the facility.

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 RCRA training program includes an introduction for handling and managing hazardous waste and spill and fire response.

The annual refresher covers general hazardous waste management and updates as needed to reflect new regulatory requirements and to introduce changes in management procedures.

The training program described above is designed to ensure that personnel not only handle hazardous wastes in a safe manner, but also properly respond to emergency situations. The program trains hazardous waste handling/management personnel to maintain compliance under both normal operation conditions and emergency conditions. Training elements address both routine and emergency situations, including the following areas:

- Procedures for using, inspecting, and replacing facility emergency and monitoring equipment.
- Key parameters for automatic waste feed cutoff.
- Communications or alarm systems.
- Response to fire/explosions.
- Response to ground-water contamination incidents; and,
- Shutdown of operations.

Pharmacia & Upjohn Co LLC offers firefighting classes to all Pharmacia & Upjohn Co LLC employees, including those working in waste management activities. This training is presented by the Pharmacia & Upjohn Co LLC firefighters to promote the knowledge of hazardous chemicals and to present appropriate firefighting techniques for specific classes of chemicals used at Pharmacia & Upjohn Co LLC. Training includes information on the use of firefighting equipment for response to chemical emergencies. This information is updated as needed to address new types of chemicals used at Pharmacia & Upjohn Co LLC and new emergency response equipment as it is obtained.

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)]

All new contractors who work at the TSD receive training prior to starting at the facility. Personnel and Environmental Professionals receive training within six months and do not work unsupervised until training is complete.

A10.C.2 Continuing Education

[R 299.9605 and 40 CFR §264.16(c)]

Personnel, Environmental professionals, and contractors directly involved with managing waste at the TSD are refreshed on the requirements for the proper management of hazardous waste, use of equipment involved in waste production/disposal, and emergency response procedures annually.

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

Environmental professionals are responsible for developing and providing initial and refresher training for employees at the facility.

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

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

The following documents will be maintained at each facility to fulfill RCRA requirements:

- Job titles and names of employees filling each job
- Written job descriptions
- Written description of type and amount of training given to each position
- Documentation that training has been given to and completed by facility personnel

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

The completion of appropriate RCRA training is tracked electronically. An environmental professional monitors the training database to ensure compliance with the RCRA training requirements. The training records are kept for current personnel until the closure of the facility and former personnel for at least three years.