

ATTACHMENT 3
PERSONNEL TRAINING PROGRAM

**FORM EQP 5111 ATTACHMENT MODULE A10
PERSONNEL TRAINING**

This document is an attachment to the Department of Natural Resources and Environment's *Instructions for Completing Form EQP 5111, Hazardous Waste Treatment, Storage, and Disposal Facilities Construction Permit and Operating License Application Form*. 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 module addresses requirements for a personnel training program at the hazardous waste management facility for the Dow Corning Corporation in Midland, Michigan. This module includes personnel training requirements for construction permits and operating license applications. The information included in the module demonstrates how the facility meets the personnel training requirements for hazardous waste management facilities.

Operating License Applicant:

Construction Permit Applicant:

R 299.9605 Personnel Training Program

R 299.9605 Personnel Training Program

This module 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)]

Dow Corning Corporation (Dow Corning) maintains an extensive training program for all employees, tailored to individual job requirements and responsibilities, to ensure safety and compliance in all operations. Each training course is administered by an employee or employees with documented expertise in the subject matter of that course, acquired through training and/or experience. These subject matter experts are responsible for determining course content, training materials and methods, required refresher period, and which employees, by job category, must take the course.

Training for Dow Corning's Midland site licensed hazardous waste facility personnel is an integral part of this corporate personnel training program. Facility personnel training is directed by the facility Training Director, who is trained and experienced in hazardous waste management procedures. The Training Director is responsible for ensuring that the training program meets all applicable regulatory requirements and is effective in teaching facility personnel to perform their duties in a manner that ensures continuing compliance of the facility with all federal, state and local regulations relating its operations.

The licensed facility at Dow Corning's Midland plant is situated within and shares many administrative services with the larger production operation and with the Dow Corning Corporation as a whole. For this reason, it is necessary to define specifically which Dow Corning employees are considered to be "facility personnel" under 40 CFR 264.16, to whom the training requirements contained therein pertain. "Facility personnel", for this purpose, includes only those Dow Corning Midland employees with the following duties and/or responsibilities:

1. Employees involved in handling, transferring, packaging, storing, inspecting, or disposing of hazardous wastes within the physical boundaries of the licensed facility, which include the 800 Block hazardous waste storage facility and 1000 Block landfill;
2. Employees responsible for direct supervision of the above activities;
3. Employees directly responsible for determining policies and procedures for the above activities;
4. The Emergency Coordinator and Alternate Emergency Coordinators for the licensed facility; and
5. The Training Director for the licensed facility.

Because the licensed facility shares administrative support with many other plant and corporate functions, and because employees involved in those functions do not handle or otherwise directly manage hazardous wastes, employees involved in those administrative functions are not considered to "facility personnel" for purposes of determining training applicability. Those Dow Corning employees not included as "facility personnel" include:

1. Clerical staff, including those responsible for maintaining training records;
2. Waste tracking computer database management staff, including those responsible for tabulating data and generating reports summarizing movements of hazardous wastes;

3. Employees responsible for generating, entering, and maintaining the information in Dow Corning's global materials documentation database, which is the source of much of the waste characterization information used by the licensed facility;
4. Company Loss Prevention Department emergency response personnel whose functions and duties during an emergency at the licensed facility would be similar to those of a local fire department and whose activities would be coordinated by the Emergency Coordinator or Alternate;
5. Service Department drivers responsible for transporting wastes to, or from, the licensed facility but not responsible for loading and unloading at the facility or operating facility equipment;
6. Regulatory staff responsible for communicating and interpreting compliance information to facility personnel as well as to other parts of Dow Corning's operations, but not responsible for determining or supervising facility operating procedures; and
7. Dow Corning Midland site and corporate management personnel not directly involved in licensed facility operations, including the Midland site Environmental Manager, who has oversight for compliance issues involving the site as a whole but is not normally involved in licensed facility operations, and the Midland site Plant Manager.

Because these persons are not directly involved in either routine facility operations or coordination of emergency response at the licensed facility, it is not appropriate to consider them to be "facility personnel" for purposes of this section.

A10.A.1 Outline for Introductory Training Program

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

The training program for the Dow Corning Midland licensed hazardous waste facility is designed to ensure that each facility employee has the necessary knowledge and skills to perform all assigned duties and carry out all responsibilities that are part of the employee's job description and to operate the facility in a safe and environmentally responsible manner.

Topics which are included in the initial and annual refresher training are listed in Table A10-1, "Facility Personnel Training", located at the end of this section. These topics are generally covered using specific Dow Corning training courses, although off-site courses and other special training sessions with similar content meeting applicable requirements may be substituted. Dow Corning's training courses are periodically revised in order to keep the training program current and pertinent.

Training is provided to Dow Corning personnel in order to teach them to perform their duties in such 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 wastes constituents which could threaten human health, property or the environment; and

- Facility personnel are familiar with the provisions of the Contingency Plan and are able to respond efficiently in the event of an emergency in order to minimize hazards to human health, property, or the environment.

During the classroom portion of the training program, employees are instructed on the provisions of the Contingency Plan; the hazardous nature of chemicals and chemical wastes in general; the purpose of RCRA 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. All approved and required training for the employees are provided through Dow Corning University. Classes are online computer based as well as classroom and hands on and the training certificates are available on-site. Those training elements of the program that address non-routine and emergency situations are listed in Table A10-1.

All facility personnel receive initial training within six months of their assignment to the licensed facility or, in the case of new regulations which affect facility operations, within six months of the effective date of the new regulations. The initial training includes, at a minimum, all the topics listed in Table A10-1, located at the end of this section. This training, together with on the job training received by working under the personal direction of an experienced supervisor during the first two weeks of assignment to the licensed facility, also meets the requirements at 29 CFR 120(p) for 24 hours of initial training for hazardous waste facility operations personnel.

Because of their roles in emergency response beyond the limited defensive roles for which the rest of the facility personnel are trained, the Emergency Coordinator and Alternate Emergency Coordinator(s) are provided with additional hazardous materials and emergency response training, known as "OSHA 40-hour HAZWOPER" training, meeting the requirements of 29 CFR 120(e). This training is provided either by trained, qualified Dow Corning personnel or is obtained off-site from professional training providers.

A10.A.2 Outline for Continuing Education

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

All facility personnel receive annual refresher training which covers, at a minimum, the topics listed in Table A10-1, located at the end of this section. This training includes the eight hour refresher training required by 29 CFR 120(p) for facility personnel. The Emergency Coordinator and Alternate Emergency Coordinator(s) receive eight hour refresher training required to maintain their 40-hour HAZWOPER certifications under 29 CFR 120(e).

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)]

Job titles and job descriptions for current facility personnel are provided in Appendix A10-1. These job descriptions are subject to change, as needed.

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)]

Training is provided to Dow Corning personnel in order to teach them to perform their duties in such 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 wastes constituents which could threaten human health, property or the environment; and
- Facility personnel are familiar with the provisions of the Contingency Plan and are able to respond efficiently in the event of an emergency in order to minimize hazards to human health, property, or the environment.

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 facility personnel receive initial training within six months of their assignment to the licensed facility or, in the case of new regulations which affect facility operations, within six months of the effective date of the new regulations. The initial training includes, at a minimum, all the topics listed in Table A10-1, located at the end of this section. This training, together with on the job training received by working under the personal direction of an experienced supervisor during the first two weeks of assignment to the licensed facility, also meets the requirements at 29 CFR 120(p) for 24 hours of initial training for hazardous waste facility operations personnel.

Because of their roles in emergency response beyond the limited defensive roles for which the rest of the facility personnel are trained, the Emergency Coordinator and Alternate Emergency Coordinator(s) are provided with additional hazardous materials and emergency response training, known as "OSHA 40-hour HAZWOPER" training, meeting the requirements of 29 CFR 120(e). This training is provided either by trained, qualified Dow Corning personnel or is obtained off-site from professional training providers.

A10.C.2 Continuing Education

[R 299.9605 and 40 CFR §264.16(c)]

All facility personnel receive annual refresher training which covers, at a minimum, the topics listed in Table A10-1, located at the end of this section. This training includes the eight hour refresher training required by 29 CFR 120(p) for facility personnel. The Emergency Coordinator and Alternate Emergency Coordinator(s) receive eight hour refresher training required to maintain their 40-hour HAZWOPER certifications under 29 CFR 120(e).

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

The introductory and continuing training programs will be conducted by personnel trained under OSHA's 40 hour hazardous waste operations and emergency response (HAZWOPER) requirements. See Appendix A10-1 for qualifications of primary and alternate Emergency Coordinators.

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)]

Complete training records are maintained for each current facility employee for the life of the facility and for former facility employees for a period of three years following their departure or reassignment from the licensed facility. These records may be kept on paper or in computer files, and include the following information:

- The job title for each job related to hazardous waste management;
- The name of each facility employee filling each job related to hazardous waste management;
- Date of hire or transfer into the licensed facility;
- A written job description for each facility job related to hazardous waste management;
- A written description of the type and amount of on-site initial and refresher training provided to facility personnel involved in hazardous waste handling and facility management;
- A written description of the type and amount of off-site training related to hazardous waste management received by each employee; and
- Documentation that the required training, both classroom and on the job, has been given to, and completed by, facility personnel.

Job titles and job descriptions for current facility personnel are provided in Attachment A10-1, located at the end of this section. These job descriptions are subject to change, as needed.

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

See Appendix A10-1.

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

See Appendix A10-1.

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 Appendix A10-1.

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 Appendix A10-1.

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

Records of training courses taken by each employee are maintained for all Midland site personnel. Training records for current facility personnel are retained for the life of the facility; records for former employees are kept for at least three years after the last date the employee worked at the facility.

**Table A10-1
Facility Personnel Training Program
Dow Corning Corporation, Midland, Michigan**

Training Topic	Environmenta l Operators (1)	Environmental Operations Crew Leader (1)	Emergency Coordinators & Training Dir. (2)
1. Facility emergency response procedures, including: a) How to activate the Contingency Plan b) Location, use, inspection, repair and replacement of facility emergency & monitoring equipment c) Waste feed cut-off systems d) Communications and alarm systems e) Response to fire or explosions f) Response to spills and releases g) Shutdown of operations	I,A	I,A	I,A
2. Hazardous waste storage area requirements	I,A	I,A	I,A
3. Waste identification and hazard communication	I,A	I,A	I,A
4. Selection and use of personal protective equipment (PPE)	I,A	I,A	I,A
5. Manifesting, packaging, labeling and placarding of hazardous wastes	I,A	I,A	I,A
6. Bonding, purging, inerting & grounding for ignitable & reactive wastes	I	I	I
7. Hazard prevention in loading & unloading	I,A	I,A	
8. Respirator medical clearance and fit test	I,A	I,A	I,A
9. Forklift training	I	I	
10. Fire extinguisher training	I,A	I,A	I,A
11. Emergency command structure	I,A	I,A	I,A
12. Landfill operations and land disposal restrictions	I,A	I,A	I,A
13. Emergency evacuation	I,A	I,A	I,A
14. Eyewash/safety showers and decontamination procedures	I,A	I,A	I,A
15. 2-weeks on-the-job training with supervisor and experienced operator	I		

**Table A10-1
 Facility Personnel Training Program
 Dow Corning Corporation, Midland, Michigan**

Training Topic	Environmental Operators (1)	Environmental Operations Crew Leader (1)	Emergency Coordinators & Training Dir. (2)
16. OSHA 24-hour HAZWOPER training	I	I	
17. OSHA 40-hour HAZWOPER training			I
18. OSHA 8-hour HAZWOPER refresher	A	A	A

Notes:

I = Initial training A = Annual refresher training

(1) See job descriptions under these titles in Appendix A10-1

(2) See job descriptions titled: Environmental Operations Coordinator, Environmental Operations Team Leader, Senior Regulatory Coordinator, Environmental Support Coordinator in Appendix A10-1.

APPENDIX A10-1

Licensed Facility Job Descriptions

Job Description for Environmental Operators, job # 0228:

Site: Licensed Facility, Midland Plant

Team: Environmental Services

Immediate Supervisor: Environmental Operations Group Leader

Job Summary: Receive, document and ship wastes through 800-block facility in safe, timely and cost effective manner. Dispose of wastes in 1000-block landfill. Complete required inspections and documentation.

Major Responsibilities:

Activity	Purpose
Tag, label, transport and receive waste drums, packs and pails; input into inventory and complete associated documentation in timely manner. Repackage wastes as needed.	To ensure regulatory requirements are met and that production limitations are minimized.
Load, transport and receive bulk wastes into tank farm; input into inventory and complete associated documentation in timely manner.	To ensure regulatory requirements are met and that production limitations are minimized.
Load bulk and container shipments to disposal facilities, initiate associated documentation. Collect samples and submit for analysis as needed.	To ensure timely disposal of wastes and to ensure that regulatory requirements are met.
Complete inspections of licensed facilities, equipment and 4705 spill pond. Maintain good housekeeping.	To meet regulatory and safety requirements. To maintain facility's appearance.
Track landfilled materials and ensure daily cover is applied as required.	To ensure regulatory requirements are met.
Wash empty drums as needed.	To meet regulatory requirements and to minimize off-site handling risks.
Report all potential compliance issues immediately to the Environmental Operations Crew Leader or Environmental Operations Coordinator.	To ensure compliance to all applicable environmental regulations and prompt reporting to governmental agencies as required by law.
Provide backup for the following team members: other environmental operators.	To ensure adequate coverage during absences/vacations

Qualifications/Skills:

Training/experience in environmental operations, regulations and compliance.

Training: On site training as described in Table A10-1.

Job Description for Environmental Operations Crew Leader, Job #0449:

Site: Licensed Facility, Midland Plant

Team: Environmental Services

Immediate Supervisor: Environmental Operations Group Leader

Job Summary: Coordinate daily activities for field operators and provide back-up as needed. Schedule waste pick-ups and shipments, and complete associated documentation.

Major Responsibilities:

Activity	Purpose
Coordinate daily activities for field operators and schedule/ assign overtime as needed to complete activities.	To ensure jobs are adequately covered and completed.
Coordinate maintenance and repair activities for 800/1000 block operations. Issue work requests and safe work permits. Ensure proper lock-out/tag-out. Complete PM tasks and document.	To maintain equipment reliability and to ensure that maintenance work is completed safely.
Coordinate waste shipments from plant to the 800-block, and from the 800-block to disposal vendors. Schedule shipments, ensure appropriate/required documentation (manifests, land bans, et al) is completed.	To ensure timely shipments of wastes and to meet regulatory requirements.
Monitor inventory levels and accuracy. Complete month-end cycle counts. Notify Environmental Operations Team Leader of issues.	To maintain inventory accuracy and to minimize inventory levels.
Report all potential compliance issues immediately to the Environmental Operations Team Leader.	To ensure compliance to all environmental regulations and prompt reporting to governmental agencies, as required by law.
Provide backup for the following team members: Job 228 environmental operators.	To ensure adequate coverage and guidance during absences/vacations

Qualifications/Skills:

5+ years operations/manufacturing experience.

Training/experience in environmental operations, regulations and compliance.

Training: On site training as described in Table A10-1.

Job Description for Environmental Operations Group Leader:

Name: Mark Arent

Site: Licensed Facility, Midland Plant

Team: Environmental Services

Immediate Supervisor: Environmental Operations Team Leader

Job Summary: Oversee day-to-day operations of the 800/1000-block to ensure that operations meet safety and regulatory requirements, meet production needs, and do not result in production limitations or shutdowns. Provide guidance on day-to-day liquid/solid waste handling and disposal to ensure that methods meet regulatory requirements (safety and environmental) and to ensure that production interruptions are minimized. Also manage Midland site's environmental service contractors, underground storage tank and secondary containment programs, and coordinate environmental database activities and maintenance.

Major Responsibilities:

Activity	Purpose
Provide day-to-day liquid and solid waste handling and disposal guidance. Primary areas of expertise are: wastes from demolition, construction and excavation activities, abandoned equipment, contaminated soils.	Ensure safe handling and regulatory compliance, and to minimize production interruptions.
Manage and maintain cradle-to-grave waste database. Correct input errors, add information as needed, identify and initiate database improvements/upgrades.	Assure data integrity and ease of use.
Oversee administration and operation of Midland Site's liquid/solid/hazardous waste and secondary containment facilities	Ensure timely, cost-effective waste disposal. Ensure compliance with safety, quality, environmental and productivity requirements.
Supervise Environmental Operators and oversee training and certification of 800-block crew leader and field controllers. Evaluate and update training/certification procedures as appropriate.	To promote effective teamwork and individual performance. To adequate training, and to ensure that regulatory requirements are met
Promote teamwork, evaluate team performance, and develop team members' skills & capabilities	Improve individual and overall team performance and effectiveness.
Lead OSHA PSM compliance for 800 block operations. Maintain documentation; follow up HAZOP recommendations; utilize PCRs.	To ensure compliance with OSHA PSM requirements.
Complete 800-block inventory assessment, accounting and control. Track cycle count accuracy and assist w/ improvements and inventory	To ensure accurate inventory tracking, and to ensure that disposal costs are charged back to appropriate cost

reductions.	centers.
Provide backup for other Env. personnel as needed.	Ensure adequate coverage and guidance during absences/vacations
Manage and provide guidance to environmental service contractors. Monitor activities and approve invoices, evaluate performance and "customer" satisfaction, and provide feedback. Lead contract renewals.	Assure timely, cost effective utilization of environmental service contractors, and Ensure that contractors meet site's needs.
Lead Midland Site's secondary containment and underground storage tank programs. Ensure that procedures are in place and utilized, prioritize upgrades, obtain support and facilitate implementation.	Ensure that USTs and containment facilities meet regulatory requirements and Dow Corning standards, and to minimize risks for soil contamination.
Lead soil excavation, handling, storage and disposal activities. Delineate areas of concern; ensure proper implementation of excavation procedures; develop plan for management of clean soil stockpiles.	Ensure handling, storage and disposal meet regulatory requirements and minimize risks for additional contamination.
Serve as Training Director for licensed facility; develop and optimize training program, lead training for licensed facility. Provide environmental training in areas of expertise for DC Midland area operations.	Ensure facility personnel receive appropriate, up-to-date environmental training.
Serve as Primary Emergency Coordinator, respond to calls from the Site within 20 minutes by phone and within 60 minutes on Site when requested.	Ensure that the Site has 24 hour coverage for environmental issues including proper mitigation, reporting, and clean-up of all releases.
Report all potential compliance issues immediately to the Environmental Services Manager.	Ensure compliance All environmental regulations and Ensure prompt reporting to governmental agencies as required by law.
Provide training to facility, plant and corporate personnel in the following areas of expertise: general waste orientation; excavation/soil disposal, 800/1000 block operations.	Ensure that plant personnel receive appropriate training and that training is up-to-date.
Maintain assigned waste procedures & documentation in the On-call manual, Compliance shells, and Environmental Services Web Page	Ensure up-to-date documentation.
Lead liquid and solid waste permitting and licensing activities. Complete License renewals, revisions, and updates.	Ensure license is up-to-date, to ensure compliance with license requirements.

Direct Governmental Reporting /Compliance Responsibilities:

Governmental Report/Compliance Activity	Reporting Period	Due Date	Filed With
Land bans and manifests,	as needed	as needed	kept onsite for MDNRE inspection
Monthly licensed facility operations documentation (tank & container logs)	monthly	10th	kept onsite for MDNRE inspection
Hazardous Waste Trailer License Renewals	2 years	March of even numbered years	MDNRE
UST License Renewals	1 year	June	MDNRE

Qualifications/Skills:

Bachelors of Science

2+ years operations/manufacturing experience.

Training/experience in environmental regulations and compliance.

Training: On site training as described in Table A10-1.

Job Description for OEMS/RCRA Leader:

Name: John Price

Site: Midland Plant

Team: Environmental Services

Immediate Supervisor: Environmental Operations Group Leader

Job Summary: Ensure that liquid and solid waste activities at Midland site meet regulatory requirements, and that risk of future noncompliance is minimized. Provide guidance on day-to-day liquid/solid waste handling and disposal to ensure that methods meet regulatory requirements (safety and environmental) and to ensure that production interruptions are minimized.

Major Responsibilities:

Activity	Purpose
Interpret liquid & solid waste regulations (State and Federal) and provide guidance to licensed facility and Midland Site on compliance. Monitor and communicate liquid/solid waste regulatory developments. Lead interface with liquid/solid waste regulatory agencies.	Ensure liquid and solid waste regulatory compliance at Midland Site and to ensure that a cooperative relationship is maintained with regulators.
Lead Environmental OEMS effort to assure compliance with RC14001 standards. Act as liaison for Site audits with BSI.	To assure that Midland Site retains its RC 14001 certification and maintains its' good standing with BSI.
Promote teamwork, evaluate team performance, and develop team members' skills & capabilities	Improve individual and overall team performance and effectiveness.
Lead development of Midland Site's Waste Minimization plan. Identify and prioritize opportunities; provide technical input; obtain support; oversee implementation; track and report progress.	Provide overall focus and to ensure progress toward waste reduction goals.
Lead RCRA Facility Investigations: 4700 Stormwater, 1000 Block Demo Pile, 604 Vault 8015	Ensure timely, cost effective resolution of these investigations.
Coordinate environmental inspection process for Midland Plant. Complete assigned building inspections and report findings.	Ensure that risks for environmental noncompliance are minimized.
Report all potential compliance issues immediately to the Environmental Operations Team Leader or Environmental Manager.	Ensure compliance with environmental regulations and prompt reporting to government agencies as required.
Maintain assigned waste procedures & documentation in the On-call manual, Compliance shells, and Environmental Services Web Page.	Ensure up-to-date documentation.
Provide backup for other Env. personnel as needed.	Ensure adequate coverage and guidance during absences/vacations

Direct Governmental Reporting /Compliance Responsibilities:

Governmental Report/Compliance Activity	Reporting Period	Due Date	Filed With
Annual review of Contingency Plan	Annually, and as changes occur.	varies	MDNRE, local emergency responders
Licensed facility permit modifications	As changes occur	varies	MDNRE
EPA Notice of Intent to Export	Annually	varies	USEPA
RCRA Biennial report	Every other year	March 1 st of even years	USEPA
Quarterly testing (implementation, interpretation, reporting).	Quarterly	Within 60 days of sampling.	MDNRE
Annual groundwater monitoring report	Annually	March 1 st	MDNRE
Waste Minimization report	Annually	not specified	In Office
Annual Hazardous Waste Export Report	Annually	March 1 st	USEPA
Monthly Facility Operating Reports	Monthly	10th	MDNRE
Hazardous Waste Facility Closure & post-closure Financial Assurance;	Annually	60 Days from prior year.	MDNRE
Annual Landfill Maintenance Report	Annually	March 1 st	MDNRE
RCRA Subpart BB & CC exception reports	As required when repair attempts pass 15 days.	Not specified	MDNRE
Newly discovered SWMUs	Not specified	Within 30 days	MDNRE
Written spill/release reporting	as required	w/i 15-days of incident	various agencies

Qualifications/Skills:

- Bachelors of Science
- Training/experience in environmental regulations and compliance.
- 5+ years in an environmental regulatory role.
- 5+ years experience in personnel training.

Training:

- On site training as described in Table A10-1.
- Additional off-site training in hazardous waste management.