

World Resources Company  
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Attachment 8  
Draft Permit

**ATTACHMENT 8**  
**TRAINING PROGRAM**

## 8. TRAINING PROGRAM

### 8.1 Introduction

World Resources Company's (WRC) policies, procedures, and practices regarding employee training were designed in accordance with the requirements of 40 Code of Federal Regulations (CFR) § 270.14(b)(12), 49 CFR Part 172, and 40 CFR § 264.16 and § 265.16. The training described herein also complies with Occupational Safety and Health Act (OSHA) requirements specified in 29 CFR Part 1910.

Facility personnel who may work with or in proximity to hazardous waste must successfully complete a program of classroom instruction and on-the-job training that teaches them to perform their duties in a way that ensures not only their own safety and efficiency but also the facility's compliance with the requirements of those regulations. WRC policies and procedures ensure that employees will understand the processes and materials with which they are working and the safety and health hazards that may be present. This training program is designed so that employees not only learn the mechanics of their job function but are also made cognizant of why they must perform certain tasks in a prescribed manner. It is also designed to relate specifically to individual job tasks. By following this training program, WRC ensures that employees are properly trained to complete the duties as described in their job descriptions.

The primary objectives of the training program are:

- To increase employee awareness of potential hazards;
- To provide the knowledge and skills necessary to perform the work with minimal risk to employee health and safety;
- To increase employee awareness of the limitations of safety equipment, machinery, and other equipment required in the workplace;
- To ensure that employees can recognize and avoid emergency situations, or safely escape from any such situations in which they may inadvertently find themselves; and
- To protect the environment while employees are performing their duties.

The sections that follow address various components of the training program, including job titles and duties for each position related to hazardous waste management, the type and amount of both introductory and continuing training required for each position, and implementation of the program.

### 8.2 Outline of Training Program

#### 8.2.1 Job Titles and Duties

Personnel who are actively engaged in the Resource Conservation and Recovery Act (RCRA) activity operations of WRC, and whose actions ensure compliance with hazardous waste regulations, are to receive the training outlined in this program. To ensure compliance with this requirement, WRC maintains:

- A list of the job titles for each position at WRC related to hazardous waste management, and the name of the employee filling each job; and
- Written RCRA activity responsibilities and minimum qualifications necessary for each position (Attachment 8-A).

## 8.2.2 Training Content, Frequency and Techniques

### 8.2.2.1 Content and Frequency

WRC provides introductory and continuing (annual refresher) training for personnel to achieve compliance with the specified regulations. This training addresses three main categories of activities:

- Operational – hazardous waste management operations;
- Facility Contingency Plan procedures; and
- Safety and emergencies – OSHA requirements.

The introductory training includes, but is not limited to, the following components as applicable to the employee's job functions:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- Communications and alarm systems;
- Emergency response to fires or explosions;
- Emergency response to groundwater contamination;
- Shutdown of operations;
- Assuring that employees know the personnel responsible for facility safety and health and under what circumstances they are to be contacted;
- Identification of safety, health, and other potential hazards present;
- Training in the use of personal protective equipment (PPE);
- Work practices to minimize risk;
- Safe use of controls and equipment;
- Medical surveillance requirements and recognition of signs and symptoms that indicate exposure to hazardous materials;
- Restrictions on certain responsibilities/tasks until required training for such has been received;
- Hazardous waste release prevention and response;
- Decontamination procedures for personnel, equipment, and tools;
- Hazards associated with wastes handled in the Hazardous Waste Management Unit (HWMU);
- Applicable RCRA and state hazardous waste regulations;
- Hazardous Materials Transportation Awareness training; and
- Hazardous Materials Transportation Security training.

A brief outline of the introductory training is provided in Attachment 8-B.

Employees receive the introductory training within 3 months after the date of their employment or assignment to a new position at the facility. The employee will remain in a “constantly supervised” situation until the introductory training is completed. This training is provided initially according to the following schedule:

- 24 hours (8 hours classroom and 16 hours on-the-job) for employees engaged in routine activities involving hazardous wastes or materials;
- 40 hours for designated managers and supervisors engaged in routine activities involving hazardous wastes or materials (provided off-site);
- Additional task-specific training (Attachment 8-C) for an employee exposed to unique or special hazards (e.g., welding or confined space entry); and
- 4 hours general awareness for employees not directly involved with hazardous-waste operations.

Facility personnel participate in an annual review of the introductory training, so that they may be informed of changes in facility processes, procedures, emergency equipment, and emergency procedures. Those personnel that received the 24 hour introductory course will attend an 8 hour refresher; those personnel that attended the 40 hour course will attend an off-site 8 hour refresher and a 4 hour on-site refresher; and those employees that received the 4 hour introductory course will receive a 4 hour refresher course. A brief outline of the refresher courses is included in the Continuing Training Program provided in Attachment 8-D.

#### 8.2.2.2 Techniques

The following techniques are utilized for training facility personnel:

- On-the-job training – employees perform tasks that provide hands-on training;
- Discussion – employees participate in less formal discussions;
- Instruction presented by video and/or slide presentation;
- Lecture – an instructor provides information; and

#### 8.2.2.3 Relevance of Training to Job Position

Task-specific training is noted on the Training Matrix as “as required” (AR). The actual task-specific training requirements are designated by the associated Department Manager, and at completion, is documented in the employee training record.

#### 8.2.2.4 Transfer of Employee from One Position to Another

When an employee is promoted or transferred to a different job position, it is the responsibility of the manager/supervisor of the new job position to notify the Environmental, Health & Safety Affairs Manager (EH&S Manager) of the change. The EH&S Manager and the new manager/supervisor will review the employee's training record to determine whether or not additional training is required. The EH&S Manager will then schedule any necessary additional training, to be completed within 3 months of transferring to the new position. The employee will not be allowed to perform the job function independently until the training is completed.

### 8.2.3 Training Coordinators

WRC's Training Program is directed by WRC's Manager of EH&S Affairs, a person trained in hazardous waste management procedures. WRC's operational portion of the training is conducted by WRC's Operations Manager, a person qualified to operate the equipment in WRC's facility. Certain task-specific training may be conducted by other qualified individuals most familiar with specific equipment or functions, including, but not limited to the Laboratory Manager, Maintenance Manager and Operations Manager.

#### 8.2.4 Training for Emergency Response

This training provides appropriate facility personnel with the necessary information to maintain compliance with applicable regulations under both normal operating conditions and emergency conditions. The Training Program is designed to ensure that personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures and emergency equipment including the following, where applicable.

- **Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment:** As described in the WRC Contingency Plan, emergency equipment (e.g., fire extinguishers, spill control equipment, etc.) is provided for response to minor spills of hazardous waste or other incidents, and facility personnel receive training on the use of this equipment relative to their job duties and responsibilities. In addition, personnel responsible for inspections receive training on how to inspect emergency and monitoring equipment, and arrange for repair or replacement, if necessary (i.e., Work Order system).

- **Cut-off systems:** Facility personnel receive training concerning the location of the emergency shutoffs for the processing equipment and conditions, as described in the WRC Contingency Plan, under which the emergency cut-offs should be used.
- **Communications and alarm systems:** As described in the WRC Contingency Plan, communications and alarm systems are available to all facility personnel, including those handling hazardous waste, and personnel are trained in the proper use of this equipment.
- **Response to fires and explosions:** Correct responses to fires or explosions, as well as other types of emergencies, are described in the WRC Contingency Plan. Personnel are trained in the proper response and use of equipment, relative to their job duties and responsibilities.
- **Site evacuation procedures:** Site evacuation procedures are described in the WRC Contingency Plan. Personnel are trained and drilled in evacuation routes and assembly areas.

### 8.3 Implementation of Training Program

Newly hired facility personnel begin the process of WRC's Training Program upon the commencement of employment. In addition, all employees participate in an annual review and evaluation of the elements of their initial training program. Employees are required to complete WRC's operational or laboratory training program for the equipment needed to perform their jobs prior to actual performance of those jobs. Additional training is performed on an ongoing basis as necessary.

WRC documents compliance with prescribed training standards by maintaining detailed personnel training records. WRC maintains the following:

- A job title for each hazardous waste management position and the name of the employee filling each position;
- A written job description for each position;
- A written description of the type, amount, and frequency of training that will be given to each person filling a waste management or operations position; and
- Records documenting the completion of the requisite training, including the completion date.

Facility personnel successfully complete their introductory training within 3 months after their hire date or assignment to a new position at the facility. Employees do not work in unsupervised positions until they have completed the training. Untrained employees may only handle hazardous wastes under the supervision of trained employees.

WRC maintains a Training database which lists employee job titles and required introductory, continuing, and task-specific training. A copy of the training record is maintained in each employee's training file. WRC also maintains checklists for employees to document training on safety and emergency equipment. The training checklists are maintained in each employee's training file.

It is the responsibility of the individual conducting any training exercise to submit a training record, including a description of the content of the training, to the EH&S Manager. Training records on current personnel are kept until closure of the facility. Training records of former employees are retained for a minimum of 3 years. Personal training records accompany personnel who are transferred within the Company.

### 8.4 Training Evaluation

Within three to six months of completion of training, the responsible Director, Manager, or designee will review and/or observe the effectiveness of the training provided. The evaluation will be documented and submitted as objective evidence to the EH&S Manager for filing.

Should the evaluation indicate that additional training is necessary, the responsible Director, Manager, or designee will arrange for that training with the EH&S Manager.

## ATTACHMENT 8-A

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### Job Descriptions

# ***ATTACHMENT 8-A***

## **WRC POSITIONS ADDRESSED BY THIS TRAINING PROGRAM**

<b>CODE</b>	<b>JOB TITLE</b>
<b>102</b>	Operations Manager*
<b>103</b>	Shift Leader*
<b>104</b>	Material Handler
<b>105</b>	Thermal Concentrating Unit Operator
<b>106</b>	Manifest Clerk
<b>107</b>	Foreman
<b>109</b>	Manager, Materials Coordination
<b>110</b>	Bldgs., Grounds, and Equip. Maint. Tech.
<b>113</b>	Mgr. of Envmntl, Health & Safety Affairs*
<b>119</b>	Laboratory Manager*
<b>120</b>	Assistant Laboratory Manager

<b>CODE</b>	<b>JOB TITLE</b>
<b>121</b>	Fire Assayer
<b>123</b>	Staff Chemist
<b>124</b>	Sampling Technician
<b>125</b>	Sample Preparation Technician
<b>127</b>	Director of Transportation & Scheduling*
<b>131</b>	Manifest Coordinator
<b>142</b>	Wastewater Treatment Unit Operator
<b>143</b>	General Manager*
<b>145</b>	Assistant Operations Manager*
<b>147</b>	Maintenance Manager*

\* Key Employees

# ***Job Descriptions***

## **102 OPERATIONS MANAGER**

### ***RCRA Activity Responsibilities***

- Responsible for all aspects of the management of the Western Facility Operations Department including direct supervision of assigned personnel.
- Ensures that all Company policies, procedures, safety regulations, and environmental regulations are followed by assigned personnel. Any discrepancies should be reported to the General Manager.
- Immediately provides all reports of incidents, either safety or environmental, to the Manager of Environmental, Health and Safety Affairs, and/or General Manager, as appropriate.
- Coordinates with the Transportation Department for the release and/or rejection of railroad cars.
- Assists in the initial training of new employees on the Operations Department's equipment and the use of manifests training.
- Serves as an Alternate Emergency Coordinator.
- Oversees the RCRA Inspection Logs for completeness and accuracy.
- Other specific tasks and job assignments as may be as required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires a High School diploma or equivalent and at least 3 years of experience as an operations manager, material manager, or equivalent. Must possess knowledge of all areas of production.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **103 SHIFT LEADER**

### ***RCRA Activity Responsibilities***

- Ensures that all operations personnel observe all established safety rules, conduct themselves in a conscientious manner, and use all equipment in accordance with safe and prescribed procedures.
- Immediately provides reports of all incidents or unusual activities to the Operations Manager.
- Responsible for the proper mixing, blending, and moving of all recyclable materials and ensuring that all debris is removed from material.
- Responsible for ensuring that all appropriate pathways are kept clean, unobstructed, and dry between all lots of recyclable materials, as well as the total cleanliness of the HWMU.
- Responsible for being actively involved in the ongoing daily operations in order to share/forward appropriate information to the next Shift Leader, prior to leaving each day.
- Provides the location of all movement of recyclable materials to the Manifest Clerk for documenting and updating the location on the diagram/map of the HWMU in the Operations office.
- Responsible for the proper covering of all recyclable materials in the event of rain/inclement weather, and ensuring that all materials are a safe distance from any possible rainwater accumulation.



Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires a High School diploma or equivalent and at least 1 year of experience in a supervisory position or 3 years of experience in facility operations.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **104 MATERIAL HANDLER**

### ***RCRA Activity Responsibilities***

- Operates industrial equipment in a safe and environmentally responsible manner and ensures that all activities are performed in accordance with the Company's operations and safety procedures.
- Responsible for handling incoming materials according to the Company's policy and procedures.
- Responsible for completion and disposition of record-keeping documentation required by Company's operating procedure.
- Ensures that all material entering the next phase of recycling is of acceptable quality and free of non-recyclable material.
- Responsible for properly completing the mixing of metal concentrates according to WRC's mixing policy and procedures.
- Responsible for the proper cleaning and/or storage of empty containers (e.g., bags, drums, boxes).
- Responsible for maintaining HWMU cleanliness and orderliness in a manner which will meet Company's high standards of appearance.
- Responsible for assisting in covering recyclable materials in the event of inclement weather.
- Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires an elementary education and at least 1 year of previous experience with industrial equipment (e.g., forklift, front-end loader) and on-the-job training for use of industrial equipment.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **105 THERMAL CONCENTRATING UNIT OPERATOR**

### ***RCRA Activity Responsibilities***

- Ensures that all equipment and/or machinery used is operated in a safe and environmentally responsible manner and that all Company safety procedures are continuously observed.
- Responsible for the cleanliness and orderliness of the TCU area in order to meet Company's high standards of appearance.
- Ensures that all material entering the TCU system is of acceptable quality.

Responsible for the proper operation of the TCU equipment and maintains production logs and all other necessary documentation.

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires a High School diploma or equivalent and at least 1 year of previous experience with industrial equipment (e.g., motors, gearboxes) and on-the-job training for use of industrial equipment.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **106 MANIFEST CLERK**

### ***RCRA Activity Responsibilities***

Reviews/verifies all incoming shipping papers and documentation for completeness outside the receiving gate, admits incoming trucks to the facility if the paperwork is in order, closes the gate immediately, and weighs incoming trucks as required by the Company's policies and procedures. Opens the gate when trucks leave, then closes it immediately.

Accurately completes and signs the incoming hazardous waste manifests, screens the completed manifests for discrepancies, as well as verifies that all other necessary paperwork is completed and attached, and prepares other record-keeping documentation as outlined in the Company's policies and procedures.

Enters all shipment information from the incoming shipping papers in the Daily Facility Activity Report (computer form).

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires at least a High School diploma or equivalent.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **107 FOREMAN**

### ***RCRA Activity Responsibilities***

Responsible for ensuring that all Operations personnel observe established safety rules, conduct themselves in an appropriate manner, and use all equipment in accordance with safe and prescribed procedures.

Responsible for the direct supervision of all assigned personnel.

Immediately provide a report of all incidents or unusual activities to the Operations Manager. In the absence of the Operations Manager, provide all reports of incidents or unusual activities, either safety or environmental, to the Manager of Environmental, Health and Safety Affairs.

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires a High School diploma or equivalent.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **109 MANAGER, MATERIALS COORDINATION**

### ***RCRA Activity Responsibilities***

Responsible for computerized process control of metal concentrates.

Responsible for all data associated with the facility's day-to-day operations including:

- incoming shipment information from Daily Facility Activity Report provided by Operations;
- concentrate and product manufacturing information; and
- all information necessary for material tracking.

Responsible for creation of metal concentrates and products:

- assigning incoming material to concentrates after material has actual assays;
- create products from concentrates for delivery to smelters; and
- coordinates and facilitates the weekly Production Planning Meeting with Operations and Lab departments to assure smooth product creation and delivery.

Other specified tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires a High School diploma or the equivalent and at least 3 years of experience in an industrial setting.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **110 BUILDINGS, GROUNDS AND EQUIPMENT MAINTENANCE TECHNICIAN**

### ***RCRA Activity Responsibilities***

Performs repairs and maintenance on all Operation's equipment, buildings, and grounds as necessary to maintain facility operations.

Performs construction in accordance with established operational and safety procedures.

Completes work orders for buildings and grounds, or equipment, as supplied by the Operations Manager and/or the Maintenance Manager, respectively.

Ensures that all equipment is used in an environmentally responsible manner and that all Company safety procedures are observed.

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications:***

#### **Education and Experience**

This position requires a High School diploma or equivalent and at least 1 year of previous experience in buildings, grounds, or equipment maintenance.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **113 MANAGER OF ENVIRONMENTAL, HEALTH & SAFETY AFFAIRS**

### ***RCRA Activity Responsibilities***

Facility administrator for all environmental, health and safety programs, policies, and procedures.

Ensures that the Training Program requirements are kept current. Conducts training classes for facility employees, including 24-hour and annual 8-hour refresher.

Alternate Emergency Coordinator. Assists in conducting drills to test the facility Contingency Plan for evacuation, emergency communications, and emergency procedures. Conducts and documents accident and/or environmental release investigations.

Responsible for ensuring compliance with all federal, state, and local regulations and permit conditions including ambient air monitoring, groundwater monitoring and reporting, personal air monitoring, OSHA accident and safety performance reporting, and EPCRA reporting.

Responsible for submitting renewal applications for existing permits, identifying new environmental and safety compliance requirements and negotiating and finalizing new facility permits.

Reviews new equipment for safety implications and creates/maintains Job Hazard Analyses.

Ensures that the employee Medical Surveillance and Drug Testing Program requirements are maintained.

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

Minimum B.S. in Technical discipline and experience in administering safety, training and environmental compliance programs with 5 to 10 years' experience.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **119 LABORATORY MANAGER**

### ***RCRA Activity Responsibilities***

Responsible for the management, operation, and hiring of personnel in the Laboratory and for ensuring that all Company policies, procedures, safety regulations and environmental regulations are followed by assigned personnel.

Immediately provides all reports of incidents, either safety or environmental to the Manager of Environmental, Health and Safety Affairs, as appropriate.

Maintains and enforces the facility Chemical Hygiene Plan and Waste Analysis Plan.

In cooperation with WRC's Pennsylvania facility laboratory, maintains an approved Quality Control program.

Certifies completed Laboratory analyses.

Responsible for understanding and being able to implement and utilize USEPA analytical methods.

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires that the employee have a B.S. in chemistry or related sciences and laboratory experience with at least 3 years in a supervisory position.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **120 ASSISTANT LABORATORY MANAGER**

### ***RCRA Activity Responsibilities***

Responsible for understanding and being able to utilize USEPA analytical methods.

Assists in the collection and analysis of all environmental samples (i.e., groundwater, soils, cements, etc.).

Coordinates, repairs, and maintains Laboratory equipment.

Certifies completed Laboratory analyses.

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires a B.S. in chemistry or related sciences.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **121 FIRE ASSAYER**

### ***RCRA Activity Responsibilities***

Oversees operations of the Laboratory including the rejection of non-conforming incoming materials.

Performs fire assaying of all samples.

Determines the acceptance or rejection of assay results.

Assists with the personal dust monitoring on site.

Assists with the respirator fit testing of all employees.

Performs facility air monitoring using a high-volume air sampler.

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

High School diploma or equivalent. Minimum requirements are 5 years of laboratory experience and 1 year of fire assay experience; or 5 years of laboratory experience and the ability to learn fire assay techniques.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **123 STAFF CHEMIST**

### ***RCRA Activity Responsibilities***

- Prepares samples for analysis.
- Analyzes samples for all constituents.
- Calculates analytical results.
- Performs cyanide distillations.
- Performs sample preparation for hexavalent chrome.
- Provides colorimetric determinations for total and amenable cyanide and hexavalent chromium.
- Responsible for understanding and being able to utilize USEPA analytical methods.
- Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position's minimum educational requirement is a B.S. degree in chemistry or closely related sciences.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **124 SAMPLING TECHNICIAN**

### ***RCRA Activity Responsibilities***

- Inspects all incoming recyclable materials for acceptability.
- Samples the incoming recyclable materials according to the Company sampling procedures.
- Assists with sample preparation.
- Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

High School diploma or equivalent. Minimum requirement is 1 year of sampling experience.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **125 SAMPLE PREPARATION TECHNICIAN**

### ***RCRA Activity Responsibilities***

- Prepares samples for metal analysis according to the Company's preparation procedures.
- Determines the percent solids on all incoming and outgoing material.
- Weights out samples for ion chromatography analysis.
- Assists with facility air monitoring using a high-volume air sampler.

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

Minimum educational requirements are High School diploma or equivalent and some college/science courses desired.

#### **Necessary Knowledge, Skills and Abilities**

Knowledge and skills specific to the job are acquired by on-the-job training. Ability to operate a grinder/pulverizer to turn samples into fine powders.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **127 DIRECTOR OF TRANSPORTATION AND SCHEDULING**

### ***RCRA Activity Responsibilities***

Ensures that the most cost-effective incoming and outgoing domestic and international shipments are arranged (including all paperwork) with responsible Company-approved, DOT-permitted transporters.

Orders and releases railroad cars for outgoing shipments as needed.

Maintains regulatory standards regarding timely pick-ups from WRC's generators and keeps generators informed of current appropriate paperwork necessary for shipments.

Supplies contracted transporters with information on WRC policies and procedures.

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires at least a High School diploma or equivalent, with college education preferred.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **131 MANIFEST COORDINATOR**

### ***RCRA Activity Responsibilities***

Reviews/verifies all incoming shipping papers and documentation for completeness and accuracy and forwards the appropriate manifest to the clients and State agencies in a timely manner.

Maintains the facility copy of the manifests along with the accompanying documentation in the client files.

Prepares shipping documents for outgoing and incoming shipments including making any necessary copies.

Manages the Client Manifest Service, including generating manifests and preparing them for mailing, and maintaining a stock of manifests.

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires at least a High School diploma or equivalent and at least 1 year of experience on a personal computer.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **142 WASTEWATER TREATMENT OPERATOR**

### ***RCRA Activity Responsibilities***

Responsible for pick-up of wastewater from the Hazardous Waste Management Unit (HWMU).

Properly stores and inventories all chemicals necessary for the operation of the WWTU.

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

High School diploma or equivalent. This position requires a minimum of 1 year of experience in plant operations at WRC.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **143 GENERAL MANAGER**

### ***RCRA Activity Responsibilities***

Manages the Western region of the United States for the Company and ensures that policies, procedures, safety regulations, and environmental regulations are strictly enforced.

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires a minimum of a B.A./B.S. degree in chemistry, engineering or related science-based discipline, with a M.A. degree in business preferred. This position also requires at least 5 years of experience in a plant manager position, preferably in the hazardous waste/materials industry.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **145 ASSISTANT OPERATIONS MANAGER**

### ***RCRA Activity Responsibilities***

In the absence of the Operations Manager, responsible for assigning operations supervision to ensure that all duties are completed in accordance with WRC policies and procedures and according to the



high standards required by WRC management for the protection of human health and the environment.

Assisting in ensuring that all Company policies, procedures, safety regulations, and environmental regulations are followed by assigned personnel. Any discrepancies should be reported to the Operations Manager.

Immediately provides all reports of incidents, either safety or environmental, to the Manager E H & S Affairs and/or Operations Manager.

Responsible for the proper preparation, proofreading, and disposition of all record-keeping documentation for the Operations Department required by the Company's operating procedures.

Assists in the initial training of all new employees on the Operations Department's activity and safety devices.

Other specific tasks and job assignments as may be as required.

### ***Minimum Qualifications***

#### **Education and Experience**

High School diploma or equivalent. This position requires at least 3 years of experience in a supervisory position.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## **147 MAINTENANCE MANAGER**

### ***RCRA Activity Responsibilities***

Responsible for all aspects of the management of the Facility Maintenance Department, including direct supervision of all assigned personnel.

Immediately provides all reports of incidents, either safety or environmental, to the Manager E H & S Affairs and/or Operations Manager.

Responsible for the maintenance of all equipment, buildings, and grounds.

Ensures that all Company policies, procedures, safety regulations, and environmental regulations are followed, with discrepancies to be reported to the appropriate department manager.

Serves as Primary Facility Emergency Coordinator.

Assists as back-up for Operations Manager.

Informs the Manager E H & S Affairs about incidents (safety and environmental).

Other specific tasks and job assignments as may be required.

### ***Minimum Qualifications***

#### **Education and Experience**

This position requires a High School diploma or the equivalent and at least 3 years of experience as operations manager, maintenance manager, or equivalent. Must possess knowledge of all areas of building, grounds, and equipment maintenance.

**Training:** For specific training required for this position, please refer to Attachment 8-E.

## ATTACHMENT 8-B

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### Introductory Training

## 24 – Hour Training Outline

COURSE DESCRIPTION
Regulations and Agencies*
Hazard Communications: Right-to-Know/SDS*
Labeling*
Chemical Inventory*
Contingency Plan Overview*
Emergency Coordinators and Chain-of-Command, Safety Personnel, Alarm System, Evacuation*
Accident Reporting*
Use of Emergency Safety/Monitoring Equipment Overview*
General Safety Awareness*
Personal Protective Equipment
Respirator Overview
Chemical Handling and Spill*
Dust Control
Work Practices/Engineering Controls
Decontamination Procedures
Medical Surveillance
Signs/Symptoms of Exposure
Lockout/Tagout Overview
Confined Space Overview
Noise Exposure
First Aid Overview*
Safety Policy*
Blood borne Pathogens Overview*
Heat Stress*
Mobile Equipment (loaders, etc.)
Fire Safety*

COURSE DESCRIPTION
Cadmium/Lead/Beryllium Policy and Signage
Welding Awareness
Hand and Power Tools
Loading/Unloading Procedures
Universal Waste*
Toxic Substances Control Act (TSCA)*
Contractor Awareness Program
DOT General Awareness Training
Tour of Site*
On-the-Job Training
HazMat Security Training

\*Required for all employees.

Key employees attend an off-site 40 hour Hazardous Waste Operations and Emergency Response class.

## ***Introductory Training Description***

**Operations, Maintenance, and Laboratory - [24 hours (8-hours classroom, 16 hours on-the-job)]**

**Administrative - [4 hours classroom]**

### **Regulations and Agencies**

**General Business of WRC:** Inform the new employee about the nature of WRC's business, including the Product Policy Statement – what we do, how we contact generators, what type of wastes we handle, why they are hazardous, how they are shipped out, etc. Educate the new employee regarding the agencies and regulations that govern WRC such as USEPA, State, County, OSHA, and DOT, emphasizing RCRA regulations.

### **Hazard Communication (Haz-Com): Right-to-Know, and Safety Data Sheets (SDSs)**

**List the four parts of the Haz-Com standard:** Training, Labeling, Inventory, and SDSs.

**SDSs:** Explain what they mean, where they are kept, how to use the index, and how to read them.

### **Labeling**

How to read a label. Never work with unlabeled containers (unless you just poured into a small container and will use it immediately). Explain how this labeling law applies to tanks, drums, and pipes as well.

### **Chemical Inventory**

Explain who takes the inventory, how it is kept current, where the inventory is located, and where the chemicals are located. Show a Chemical Locations Site Plan (SP-C01) identifying the locations of all the chemicals on site.

### **Contingency Plan**

Review the overall contents and purpose of the WRC Contingency Plan with the new employee.

### **Emergency Coordinators and Chain-Of-Command, Alarm System, Safety Personnel, and Evacuation**

**Emergency Coordinator(s):** Explain the function of the Emergency Coordinator(s), who they are, notification procedures, etc. Explain the chain-of-command at the facility.

**WRC Personnel Responsible for Safety:** Explain the chain-of-command regarding safety and inform the new employee of the Safety Committee and its role and activities.

**Response to Fire or Explosion:** Discuss the emergency equipment available for use at the site, including fire extinguishers. Show the evacuation map to the new employee and discuss WRC's evacuation plan and routes.

**Communication and Site Alarm Systems:** Discuss the different types of communication systems available, including telephones, emergency site alarms, two-way radios, and the public address system. Point out the emergency phone numbers posted on the telephones. Show the new employee the alarms, their operation, and their location.

### **Accident Reporting**

Discuss accident and injury reporting and near-miss accident and injury reporting.

### **Use of Emergency Safety and Monitoring Equipment Overview**

Using the checklist of all emergency, safety, and monitoring equipment, trainer reviews their use, capability, number, and location with the new employee.

### **General Safety Awareness**

Discuss the overall safety program and the requirements for use of safety glasses, steel-toed shoes/boots, long sleeve shirts and pants, gloves, hard hats, etc. Explain that the employee should report any unsafe conditions to his/her supervisor or the Manager of Environmental, Health and Safety Affairs. Explain the safety aspects of jobs not done by the employee but which may be encountered by the employee occasionally (i.e., welding).

### **Personal Protective Equipment**

Discuss objectives of Personal Protective Equipment (PPE): policy; types of PPE available; and how PPE is used. Explain why dirty uniforms are not to be removed from the site. Explain how different hazards apply to different jobs.

### **Respirator Overview**

Discuss the different types of respirators and why WRC uses the HEPA filter on its half-masked respirators. Explain OSHA's policy on fit testing respirators annually. Review the Respirator Policy section of the WRC Contingency Plan which lists the various tasks that require the use of a respirator. Explain the actual testing procedure to be followed with regard to fit-testing a respirator.

### **Chemical Handling and Spill**

**Working Safely with Chemicals:** Discuss the general safety principles that should be followed with chemicals, including: no siphoning by mouth; no mixing of incompatible chemicals; no eating, smoking or drinking while working with chemicals, wear proper personal protective equipment, and be sure there is adequate ventilation.

**Spill Control:** The references to spills and their cleanup in the Contingency Plan are explained to the employee.

## **Dust Control**

The particular operations that create dust are discussed with the employee. These tasks include dry sweeping with the sweeper or a broom, loading outgoing material, receiving dry incoming materials, operating equipment (forklifts, loaders) used to move dry materials, and the grinding of samples in the laboratory. The methods to control dust are also discussed. These methods include: operating equipment at lower speeds, keeping the loader bucket low to the ground when unloading dry material, keeping operation areas under the fabric mesh canopy swept, and using rakes instead of the tiller on very dry material.

## **Work Practices/Engineering Controls**

Explain common work practices that enhance overall safety, including: driving industrial vehicles slowly; not creating dust; no electrical cords in contact with water; no blocking of aisles; and good housekeeping.

## **Decontamination Procedures**

Discuss WRC policies and procedures for personal and equipment decontamination, including use of a high efficiency particulate air vacuum for removal of recyclable material from uniforms, overall personal hygiene, and use of the employee showers.

## **Medical Surveillance**

Explain why the new employee is medically tested, the parameters tested and what they mean. Explain that WRC receives only work specific information and the medical qualification sheet, and how the new employee can get copies of his/her own results. Inform the new employee of how long OSHA stipulates the records be kept. Explain the different types of physicals; initial (to establish baseline), annual, and exit.

## **Signs and Symptoms of Exposure**

Explain the routes by which chemicals may enter the body, such as inhalation, ingestion and skin absorption; the hazards of the materials WRC accepts, in detail; and the factors that influence toxicity.

Explain target organs. Explain how various metals affect the body and the target organs for each.

## **Lockout/Tagout Overview**

The OSHA lockout/tagout regulation is explained. WRC policy for the proper sequence to follow regarding lockout/tagout is discussed, and the personnel who are authorized to perform lockout/tagout are identified to the employee. It is imperative that all employees fully understand the differences between the “authorized” and the “affected” employees and that they know who the authorized employee is in their respective areas. A list of the equipment on site categorized according to area is shown to the employee.

## **Confined Space Overview**

The OSHA confined space entry regulation is explained and the WRC Confined Space Entry Policy is presented and discussed.

## **Noise Exposure Overview**

Outline the OSHA policy governing noise exposure.

## **First Aid Overview**

**First Aid:** The employee's first responsibility is to assess any injury situation and obtain professional help. First-aid is performed only if the employee has been trained in proper first-aid procedures. Also discussed: how to call 911 (do not hang up after dialing). Explain why you should not move an accident victim.

**First-Aid Kits:** Describe where they are, how many are on site, and how they are serviced.

## **Safety Policy**

**Safety First – Not Production:** Explain who the Manager of Environmental, Health and Safety Affairs is, how to report injuries, and the need for reporting an incident that is termed a “near-miss.” Explain the Company policy regarding safety and how the Manager of Environmental, Health and Safety Affairs can shut down or stop a task if he/she deems it unsafe. Explain the function of the Safety Committee, who is a permanent member, and how we rotate people so that all employees can serve on the committee.

## **Bloodborne Pathogens Overview**

Discuss OSHA policy governing Bloodborne Pathogens.

## **Heat Stress**

Discuss the types of physical conditions that cause one to be more prone to heat stress such as obesity, alcoholism, chronic heart or lung diseases, lack of acclimatization, and age (infants and the elderly). Explain the different types of heat stress and the first-aid techniques employed to counteract them. Discuss the different aids WRC has available on site to make working outside in the heat safer.

## **Mobile Equipment (loaders, etc.)**

**Equipment:** Explain to the new employee how loaders, forklifts, and sweepers are used in WRC's operation. Explain that only those who are certified in the operation of the loaders, forklifts and sweepers can operate them.

## **Fire Safety**

The various items of safety equipment to be used in the event of a fire (fire alarm system, fire blankets, fire extinguishers, smoke detectors, etc.) are explained to the employee.

## **Cadmium, Lead, and Beryllium Policy and Signage**

OSHA cadmium/lead standards are discussed. HWMU signage is also discussed. Discussion on the beryllium policy and its potential health effects is included.



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### **Welding Awareness**

WRC's Welding/Cutting Procedure Policy is explained. Safety parameters are discussed, as are the do's and don'ts while in the area of any in-progress welding.

### **Use of Hand Tools and Power Tools**

Various small hand-held tools and their operations are demonstrated to the new employee if these tools are to be used in the performance of his/her job. Safe operation of these tools is stressed.

### **Loading/Unloading Procedures**

The details of WRC loading and unloading operations are explained and discussed. Safety principles in conjunction with these procedures are stressed.

### **Universal Waste**

Universal Waste regulations and WRC's recycling procedures for those wastes are discussed.

### **Toxic Substances Control Act (TSCA)**

Explain what the Act covers and how a violation is to be reported. Explain what a TSCA violation is (harmful to environment and/or human health).

### **Contractor Awareness Program**

**Contractor Awareness Program:** Review the WRC Contractor Awareness Program with the new employee.

### **DOT General Awareness Training**

Department of Transportation General Awareness training is explained and presented.

### **Tour of Site**

The new employee tours the site in order to learn the physical location of equipment used at WRC for emergencies, safety, and monitoring, and to observe trained employees performing their particular job functions.

### **HazMat Security Training**

This class discusses the requirements outlined in the Department of Transportation Hazardous Materials Docket HM-232. These requirements are:

- awareness of security risks associated with hazmat transportation;
- methods to enhance transportation security; and
- how to recognize and respond to possible security threats.

## ATTACHMENT 8-C

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### Task-Specific Training

# ***ATTACHMENT 8-C***

## ***Task-Specific Training Outline***

<b>COURSE CODE</b>	<b>COURSE DESCRIPTION</b>
201	RESERVED
202	PPE Use
203	Respirator Use and Care
204	Lockout/Tagout
205	Confined Space
207	Loader Operations
209	Manifest Training
210	Powered Industrial Trucks (PIT)
211	Sweeper/Scrubber Operations
212	Tractor Operations
213	Welding/Cutting Procedures
214	Pressure Washer
215	Eyewash/Shower, Water Supply Shut-Off (HWMU)
216	Hand and Power Tools
217	Chemical Hygiene Plan (Lab)
218	Non-Rigid Container Washing
219	Rigid Container Washing
220	Materials Received Evaluation Training (Lab)
221	AA Spectrophotometer Operation (Lab)
222	ICP Spectrophotometer Operation (Lab)
223	Ion Chromatograph (IC) Operation (Lab)
224	Analytical Balances (Lab)
225	EPA Method 9010 - Cyanide Distillation Equipment (Lab)
226	Secondary Sampling/Percent Solids (Lab)
227	pH Meter (Lab)

<b>COURSE CODE</b>	<b>COURSE DESCRIPTION</b>
228	Sampling Material (Lab)
234	EPA Method 9014
235	Universal Waste Handling
236	Facility Inspection
237	Contractor Awareness Program
238	Portable Ladder Safety
239	Water Removal at Oil/Diesel Pad
240	Debris Cleaning and Disposal
241	VOC Awareness
242	Dust Control Awareness
243	Thermal Concentrating Unit
244	Opacity Class "Smoke School" (Classroom) - Biennial
245	Opacity Class "Smoke School" (Field) - Semi-annual
246	Used Oil Management
247	Fall Protection
249	Maintenance of HWMU
251	Occupational Noise Exposure – TCU Area
252	Boomlift Operation
253	Lab Safety General Overview
257	Quality Assurance Manual (Lab)
258	Lab Procedures Manual (Lab)
259	Pre-Acceptance Testing (Lab)
260	OVA Use (Lab)
261	Cyanide Meter Use (Lab)
262	Geiger Counter Use (Lab)
264	CN Distillation Apparatus (Lab)
266	Pipettes (Lab)
267	Settlement Precious (Lab)
268	SuperSpan Netting Repair
270	Lab Inspections (Lab)

COURSE CODE	COURSE DESCRIPTION
271	Use of Respirator During Pre-Acceptance Testing (Lab)
272	Truck Wash Basin
277	Railcar Inspection, Repair, & Rejection Procedures
280	DOT Refresher*
281	HAZMAT Security Refresher*

\* Course 280 and 281 are conducted on a triennial basis.

## ***Task-Specific Training Description***

### **201 RESERVED**

### **202 Personal Protective Equipment (PPE) Use**

Discuss objectives of the PPE policy, types of PPE available, and how PPE is used. Explain why dirty uniforms are not to be removed from the site. Demonstrate items of PPE.

### **203 Respirator Use and Care**

Discuss the different types of respirators and why WRC uses the HEPA filter on its half-masked respirators. Explain OSHA's policy on fit testing respirators annually. Discuss how to clean a respirator. Explain the actual testing procedure to be followed with regard to fit-testing a respirator.

### **204 Lockout/Tagout**

The lockout/tagout policy and procedure is discussed in detail with the employee. The proper sequence to follow regarding lockout/tagout is also discussed. A list of personnel who are authorized to perform lockout/tagout is read to the employee. A list of the equipment on site categorized according to area is shown to the employees.

### **205 Confined Space**

The WRC Confined Space Entry policy and procedure is reviewed with employees in detail.

### **207 Loader Operations**

Loader Operations training is only provided to employees whose job duties require the operation of a loader. The training includes: discussions including, but not limited to, Warning Signs & Labels and on-the-job training.

### **209 Manifest Training**

The manifest training is for any employee whose job title requires that he/she verify the accuracy of, and/or provide his/her signature on, the manifest. The training is conducted by an appropriately qualified individual. Manifest orientation includes: authorized employees; USEPA identification number; authorized waste codes; USEPA authorized abbreviations for containers as well as units of measure; waste codes; conversion charts for units of measure; procedure for handling discrepancies; MSDSs; Guide 171; and LDRNs.

### **210 Powered Industrial Trucks (PIT)**

The PIT training is only provided to employees whose job duties require the operation of a powered industrial truck. Tri-annual powered industrial truck training includes lecture, PPE use, observed PIT operation, a written test, and, a driving test. New employees are required to complete training prior to operating Powered Industrial Trucks.

### **211 Sweeper/Scrubber Operations**

The Sweeper Operations training is only provided to authorized employees whose job duties require the operation of the sweeper.

## **212 Tractor Operations**

Tractor Operations training is only provided to employees whose job duties require the operation of the Tractor.

## **213 Welding/Cutting Procedures**

The WRC Welding/Cutting Procedure Policy is explained and discussed in detail. This course is not designed to instruct on welding techniques; rather, it concerns the regulations and requirements of 29 CFR § 1910.252-.254.

## **214 Pressure Washer**

Pressure washer training includes on-the-job training, proper use and safety of pressure washers, and PPE use.

## **215 Eyewash/Shower/Water Supply Shut-Off**

The proper uses of the eyewash stations/shower/water supply shut off are covered in detail.

## **216 Hand and Power Tools**

The proper use of hand tools is discussed, as is the proper use of PPE.

## **217 Chemical Hygiene Plan**

All Laboratory employees are given detailed training on the contents and location of the CHP to familiarize them with the proper procedures for working in the laboratory as it applies to their duties and responsibilities.

## **218 Non-Rigid Container Washing**

Employees are instructed on how to wash non-rigid containers and in container handling and cleaning procedures. On-the-job training is included.

## **219 Rigid Container Washing**

Employees are instructed on how to wash rigid containers and in container handling and cleaning procedures. On-the-job training is included.

## **220 Materials Received Evaluation Training (Lab)**

Employees are instructed on the purpose of the Materials Received Evaluation and each section is described in detail. On-the-job training is included.

## **221 AA Spectrophotometer Operation (Lab)**

Employees are instructed in proper start-up and shut-down, use of gas, and operating procedures, as found in the AA manufacturer's guidelines. On-the-job training is included.

## **222 ICP Spectrophotometer Operation (Lab)**

Employees are instructed in proper start-up and shut-down and operating procedures as found in the ICP manufacturer's guidelines. On-the-job training is included.

## **223 Ion Chromatograph (IC) Operation (Lab)**

Employees are instructed on proper start-up and shut-down and operating procedures as found in the IC manufacturer's guidelines. Also covered are equipment functions, parts and purpose, use of the water purifier and digestion bath, procedures for the making of digestion matrix and standards, and cleaning of the glassware. On-the-job training is included.

## **224 Analytical Balances (Lab)**

Employees are instructed on the proper use, calibration, and operating procedures as found in the analytical balances manufacturers' guidelines. On-the-job training is included.

## **225 EPA Method 9010 - Cyanide Distillation Equipment (Lab)**

Employees are instructed on the proper assembly for cyanide distillation, proper disassembly for washing glassware, and the proper use of the water re-circulator. Training includes instruction on performing SW846 Method 9010. On-the-job training is included.

## **226 Secondary Sampling/Percent Solids (Lab)**

Employees are instructed on proper usage of the sample prep equipment AND the pulverizer. Also covered are the procedures for acid digestion for base metals, proper paperwork, as well as procedures in WRC's Laboratory Manual. On-the-job training is included.

## **227 pH Meter (Lab)**

Employees are instructed on proper start-up, shut-down, calibration, proper reading, and checking buffers and samples. On-the-job training is included.

## **228 Sampling Material (Lab)**

Employees are instructed on proper sampling as described in WRC's Laboratory Manual, as well as on the proper completion of paperwork. All individuals are certified after passing a test. On-the-job training is included.

## **234 EPA Method 9014**

Employees are instructed on proper technique for performing SW846 Method 9014. Training includes instruction on proper disposal of waste generated from the method. On the job training is included.

## **235 Universal Waste Handling**

Explanation of the Universal Waste Rule under 40 CFR Part 273, definition of Universal Waste, what types of universal waste WRC's Phoenix facility recycles, accidental spill procedures and proper PPE.

## **236 Facility Inspection**

Training on pertinent sections of the WRC Inspection Schedule. Selected individuals will receive an orientation on the inspection process.

## **237 Contractor Awareness Program**

Designated individuals review the WRC Contractor Awareness Program and their responsibilities.

## **238 Portable Ladder Safety**

Employees are instructed on the proper use, care, and storage of portable ladders.

## **239 Rainwater Removal at Oil/Diesel Pad**

Employees are instructed on the removal of rainwater from the WRC oil/diesel pad.

## **240 Debris Cleaning and Disposal**

Employees are instructed in the proper procedures of documenting, labeling, tracking, cleaning, and disposal of debris that occasionally arrives in shipments mixed with incoming recyclable material.



## **241 VOC Awareness**

Discuss the requirements for not using, storing or disposing of VOC materials and the acceptance criteria for recyclable material containing VOCs.

## **242 Dust Control Awareness**

This class provides for review of the WRC's Maricopa County Air Permit. Discuss the requirements set forth in the Air Permit for the control of dust generated by equipment and/or mobile equipment in the HWMU.

## **243 Thermal Concentrating Unit**

Employees are given hands-on training either at WRC Pennsylvania or WRC Arizona by WRC-qualified operators.

## **244 Opacity Class "Smoke School" (Classroom) – Biennial**

Opacity class ("smoke school") is an air quality permit requirement for thermal concentrating unit operators. Classroom participation is required every 2 years.

## **245 Opacity Class "Smoke School" (Field) – Semi-annual**

Opacity class "smoke school" is an air quality permit requirement for TCU operators. Field participation is required every 6 months.

## **246 Used Oil Management**

This class provides instruction to employees regarding the management of used oil. It includes definitions, examples, and information on how to manage used filters and oil spills.

## **247 Fall Protection**

Employees are instructed in fall protection and review of the OSHA fall protection standards.

## **249 Maintenance of Hazardous Waste Management Unit (HWMU)**

Employees are given hands-on training and review the Maintenance of Hazardous Waste Management Unit portion of the WRC Operations & Maintenance Manual.

## **251 Occupational Noise Exposure – Thermal Concentrating Unit**

Review OSHA standard and site specific information.

## **252 Boomlift Operation**

Includes review on manufacturers operating manual and demonstration of operating capability.

## **253 Lab Safety General Overview**

An initial review of laboratory safety procedures.

## **257 Quality Assurance Manual (Lab)**

The employee is asked to read the entire contents of the Lab Quality Assurance Manual.

## **258 Lab Procedures Manual (Lab)**

The employee is asked to read the entire contents of the Lab Procedures manual that they will be responsible for. The lab procedures outlined in this manual are those for which the lab.

### **259 Pre-Acceptance Testing (Lab)**

The employee is trained in the proper techniques for testing incoming shipments to ascertain whether or not the shipment meets acceptance limits set forth by the permit.

### **260 OVA Use (Lab)**

The employee is instructed how to properly turn on/shut off the instrument as well as the use of the OVA to test for the presence of organic vapors from material.

### **261 Cyanide Meter Use (Lab)**

The employee is instructed how to properly turn on/shut off the instrument as well as use the cyanide meter to test for the presence of cyanide from material.

### **262 Geiger Counter Use (Lab)**

The employee is instructed how to properly turn on/shut off the instrument as well as use the Geiger counter to test for the presence of radionuclides from material.

### **264 CN Distillation Apparatus (Lab)**

The employee is trained on the proper use of the cyanide distillation apparatus for implementation in the analysis of samples through EPA Method 9010.

### **266 Pipettes (Lab)**

The employee is trained in the proper techniques for using pipettes to dispense specific volumes of liquids.

### **268 Settlement Precious (Lab)**

The employee is instructed how to perform the lab method for digesting and preparing precious samples for ICP analysis.

### **270 Lab Inspections (Lab)**

The employee is trained on laboratory specific sections of the WRC Inspection Schedule.

### **271 Use of Respirator During Pre-Acceptance Testing (Lab)**

Discuss the different types of respirators and why WRC uses the specific filters and respirators during pre-acceptance testing. Explain OSHA's policy on fit testing respirators annually. Discuss how to clean a respirator. Explain the actual testing procedure to be followed with regard to fit-testing a respirator.

### **272 Truck Wash Basin**

The employee is instructed on the proper location for washing out the trucks and the use of the proper safety equipment while performing this function.

### **277 Railcar Inspection, Repair & Rejection Procedures**

The employee is instructed on WRC's procedure for railcar inspection, repair criteria, and rejection criteria.

### **280 DOT Refresher**

Department of Transportation General Awareness training is presented with any regulatory changes noted. This class is conducted triennially.

## **281 HAZMAT Security Refresher**

This class discusses the requirements outlined in the Department of Transportation Hazardous Materials Docket HM-232. These requirements are:

- awareness of security risks associated with hazmat transportation;
- methods to enhance transportation security; and
- how to recognize and respond to possible security threats.

This class is conducted triennially.

## ATTACHMENT 8-D

### Continuing Training

# ***ATTACHMENT 8-D***

## ***8 Hour Continuing Training***

### **Training Outline**

<b>COURSE DESCRIPTION</b>
Update on Regulations and Agencies*
Hazard Communications: Right-to-Know/MSDS*
Labeling*
Chemical Inventory*
Contingency Plan Overview*
Emergency Coordinators and Chain-of-Command, Safety Personnel, Alarm System, Evacuation*
Accident Reporting*
Use of Emergency Safety/Monitoring Equipment Overview*
General Safety Awareness*
PPE--Job Hazard Analysis
Respirator Overview
Chemical Handling and Spill*
Dust Control
Work Practices/Engineering Controls
Decontamination Procedures
Medical Surveillance
Signs/Symptoms of Exposure
Lockout/Tagout Overview
Confined Space Overview
Noise Exposure
First Aid Overview*
Safety Policy*
Bloodborne Pathogens Overview*
Heat Stress*

COURSE DESCRIPTION
Mobile Equipment (loaders, etc.)
Fire Safety*
Cadmium/Lead/Beryllium Policy and Signage
Welding Awareness
Hand and Power Tools
Loading/Unloading Procedures
Universal Waste*
Toxic Substances Control Act (TSCA)*
Contractor Awareness Program*

\*Required for all employees.

Key employees attend an off-site 8 hour Hazardous Waste Operations and Emergency Response class.

## ATTACHMENT 8-E

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### Training Matrices

## 24 or 40 HOUR INTRODUCTORY TRAINING

KEY: **R**= Required; **AR** =As Required

JOB CODE	JOB TITLE	24 HOUR	40 HOUR (off-site)
102	Operations Manager		<b>R</b>
103	Shift Leader		<b>R</b>
104	Material Handler	<b>R</b>	
105	Thermal Processing Unit Operator	<b>R</b>	
106	Manifest Clerk	<b>R</b>	
107	Foreman		<b>R</b>
109	Manager, Materials Coordination	<b>R</b>	
110	Building, Grounds & Equipment Maintenance Technician	<b>R</b>	
113	Manager of Environmental Safety & Health Affairs		<b>R</b>
119	Laboratory Manager		<b>R</b>
120	Assistant Laboratory Manager	<b>R</b>	
121	Fire Assayer	<b>R</b>	
122	Analytical Technician	<b>R</b>	
123	Staff Chemist	<b>R</b>	
124	Sampling Technician	<b>R</b>	
125	Sample Preparation Technician	<b>R</b>	
127	Director of Transportation & Scheduling		<b>R</b>
129	Materials Coordinator	<b>R</b>	
142	Wastewater Treatment Unit Operator	<b>R</b>	
143	General Manager		<b>R</b>
145	Assistant Operations Manager		<b>R</b>
147	Maintenance Manager		<b>R</b>



## 8 HOUR ANNUAL CONTINUING TRAINING

KEY: **R**= Required; **AR** =As Required

JOB CODE	JOB TITLE	8 HOUR	8 HOUR (off-site)
102	Operations Manager		<b>R</b>
103	Shift Leader		<b>R</b>
104	Material Handler	<b>R</b>	
105	Thermal Processing Unit Operator	<b>R</b>	
106	Manifest Clerk	<b>R</b>	
107	Foreman		<b>R</b>
109	Manager, Materials Coordination	<b>R</b>	
110	Building, Grounds & Equipment Maintenance Technician	<b>R</b>	
113	Manager of Environmental Safety & Health Affairs		<b>R</b>
119	Laboratory Manager		<b>R</b>
120	Assistant Laboratory Manager	<b>R</b>	
121	Fire Assayer	<b>R</b>	
122	Analytical Technician	<b>R</b>	
123	Staff Chemist	<b>R</b>	
124	Sampling Technician	<b>R</b>	
125	Sample Preparation Technician	<b>R</b>	
127	Director of Transportation & Scheduling		<b>R</b>
129	Materials Coordinator	<b>R</b>	
142	Wastewater Treatment Unit Operator	<b>R</b>	
143	General Manager		<b>R</b>
145	Assistant Operations Manager		<b>R</b>
147	Maintenance Manager		<b>R</b>

TASK-SPECIFIC TRAINING										201-237																													
KEY: R = REQUIRED; AR = AS REQUIRED (see individual Training file)																																							
JOB CODE		COURSE CODE NUMBERS																																					
↓	JOB TITLE	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	
102	Operations Manager		AR	AR	R	R	R	R		R	R	AR	AR		R	R	R		R	R															R	R	R		
103	Shift Leader		R	R	R	R	R	R		R	R	R	R		R	R	R		R	R															R	R			
104	Material Handler		R	R	R	R		R			R	R	R		R	R	R		R	R															R	R			
105	Thermal Concentrating Unit Operator		R	R	R	R		R			R	R	R		R	R	R		R	R															R	R			
106	Manifest Clerk		R	R	R	R		R		R	R	R	R		R	R	R		R	R															R	R			
107	Foreman		R	R	R	R	R	R		R	R	R	R		R	R	R		R	R																R			
109	Manager, Materials Coordination		AR	AR		AR																																	
110	Building/Grounds, and Equipment Maintenance Technician		R	R	R	R		R			R	R	R	R	R	R	R																		R	R			
113	Manager of Environmental Health & Safety Affairs		AR	AR	AR		R																												R	AR	R		
119	Laboratory Manager		R	R	AR	AR	R				AR				AR	AR		R			R	R	R	R	R	R	R	R	R						R	AR	R	R	
120	Assistant Laboratory Manager		R	AR							AR				AR	AR		R			AR	AR	AR	R	R	R	R	R	R						AR		AR		
121	Fire Assayer		R	R							AR				AR	AR		R			AR	AR	AR	AR	R	AR	AR	R	R						AR		AR		
123	Staff Chemist		R	AR		AR					AR				AR	AR		R			AR	AR	R	R	R	R	R	R	R						AR		AR		
124	Sampling Technician		R	AR		AR					AR				AR	AR		R			AR	AR	AR	AR	R	AR	AR	R	R						AR		AR		
125	Sample Preparation Technician		R	AR		AR					AR				AR	AR		R			AR	AR	AR	AR	R	AR	AR	R	R						AR		AR		
127	Dir. of Transportation & Scheduling						R			R																													
131	Manifest Coordinator		AR	R						R																													
142	Wastewater Treatment Unit Operator		R	R	R	R					R				R	AR	R	AR													R	R	R	R			AR	R	R
143	General Manager		AR	AR			R																															AR	
145	Assistant Operations Manager		R	R	R	R	R	R		R	R	R	R	AR	R	R	R		R	R																R	R	R	
147	Maintenance Manager		R	R	R	R	R	R			AR	AR	AR	AR	AR	AR	R																AR			R	R	R	

TASK-SPECIFIC TRAINING										238-281																														
KEY: R = REQUIRED; AR = AS REQUIRED (see individual Training file); T = TRIENNIAL																																								
JOB CODE		COURSE CODE NUMBERS																																						
↓	JOB TITLE	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	270	271	272	277	280	281		
102	Operations Manager	R	R	R	R	R	R	R	R	R	R		R		R	AR											R								R	R	TR	TR		
103	Shift Leader	R	R	R	R	R				R	R				R	AR																		R	R	TR	TR			
104	Material Handler	R	R	R	AR	R					R				R	AR																			AR	AR	TR	TR		
105	Thermal Concentrating Unit Operator	R		R	AR	R	R	R	R		R				R	AR																			AR	AR	TR	TR		
106	Manifest Clerk	R			AR	R	AR	R	R		R				R	AR																			AR	AR	TR	TR		
107	Foreman	R	R	R	AR	R					R				R																				AR	AR	TR	TR		
109	Manager, Materials Coordination				R	R																															TR	TR		
110	Building/Grounds, and Equipment Maintenance Technician	R	R		AR	R				R	R		R		R	R																	R			AR		TR	TR	
113	Manager of Environmental Health & Safety Affairs	AR								AR	AR				AR																							TR	TR	
119	Laboratory Manager	AR			AR						AR	R			AR		R				R	R	R	R	R	R	R	R	R	R	R			R	R			TR	TR	
120	Assistant Laboratory Manager	AR			AR						AR	R			AR		R				R	R	R	AR	AR	AR	AR	AR	AR	R	R			AR	AR			TR	TR	
121	Fire Assayer	AR			AR						AR						R				R	R	R	AR	AR	AR	AR	AR	AR	R	R	R			AR	AR			TR	TR
123	Staff Chemist	AR			AR						AR						R				R	R	R	AR	AR	AR	AR	AR	AR	R	R			AR	AR			TR	TR	
124	Sampling Technician	AR			AR						AR						R				R	R	R	AR	AR	AR	AR	AR	AR	R	R			AR	R			TR	TR	
125	Sample Preparation Technician	AR			AR						AR						R				R	R	R	AR	AR	AR	AR	AR	AR	R	R			AR	R			TR	TR	
127	Dir. of Transportation & Scheduling																																					TR	TR	
131	Manifest Coordinator																																					TR	TR	
142	Wastewater Treatment Unit Operator	R	R		AR						R	R						R																				TR	TR	
143	General Manager																																					TAR	TAR	
145	Assistant Operations Manager	R	R	R	R	R	R	R	R	R	R		R		R	R																		R				AR	TR	TR
147	Maintenance Manager	R	R		AR			R	R	R	R		R		R	AR		R															R						TR	TR