

ATTACHMENT F – PERSONNEL TRAINING PROGRAM

PERSONNEL TRAINING PROGRAM

Heritage Environmental Services, LLC
284 East Storey Road
Coolidge, AZ 85128

AZD 081 705 402

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1. INTRODUCTION

The purpose of this Personnel Training Plan is to describe the RCRA hazardous waste management training provided to employees as required by 40 CFR 264.16. Additional training may be provided due to other regulatory requirements or internal recognition of need.

2. JOB TITLES/JOB DESCRIPTIONS/REQUIRED TRAINING

The hazardous waste related duties of employees have been divided into several job titles with job descriptions. Training will be designed for each job description to address the skills required to perform that job.

2.1. Professional (Facility Manager, Environmental Compliance Manager)

2.1.1. *Hazardous Waste Related Job Description*

1. Conducts duties in a safe and compliant manner.
2. May manage supervisors, hazardous waste technicians, and/or drivers.
3. May schedule work assignments required to maintain a functional facility.
4. May interact with environmental agencies and prepare compliance documentation.
5. May participate in wastestream approval.
6. May provide guidance to supervisors or hazardous waste technicians on the storage of materials.
7. May provide guidance to supervisors or hazardous waste technicians on the management of difficult-to-process materials.
8. May schedule hazardous waste shipments off-site.
9. May prepare hazardous wastes for off-site shipment.
10. May conduct inspections and identify approved non-USDOT containers.
11. May conduct or schedule hazardous waste training of facility employees.
12. May supervise or conduct the consolidation and/or bulking of liquid or solids materials as allowed by the permit (see Permit Attachment C, Container Storage and Consolidation Plan).
13. May supervise or conduct solids (filter cake) blending.
14. May review the relevant properties and document that the liquid adsorbents are safe and effective, and are compatible (e.g., produces no deleterious gases or other bi-products) with the hazardous waste.

2.1.2. *Requisite Skill, Education, or Other Qualifications*

1. High school diploma or equivalent.
2. College education preferred.
3. Previous experience in hazardous waste field preferred.
4. Management experience preferred.

2.1.3. *Initial Training*

1. Introduction to RCRA
2. Definition of Hazardous Waste
3. Contingency Plan
4. Outgoing Manifest Completion

5. Incoming Manifest Review
6. Container Management and Storage Area Standards
7. Satellite Accumulation Standards
8. Preparedness and Prevention
9. Land Disposal Restrictions
10. Materials Consolidation & Bulking
11. Solids (Filter Cake) Blending
12. Waste Analysis Plan

2.1.4. Annual Training

1. Contingency Plan
2. Outgoing Manifest Completion
3. Incoming Manifest Review
4. Container Management and Storage Area Standards
5. Satellite Accumulation Standards
6. Preparedness and Prevention
7. Land Disposal Restrictions
8. Materials Consolidation & Bulking
9. Solids (Filter Cake) Blending
10. Waste Analysis Plan

2.2. Supervisor (11-Day Supervisor, Field Chemist)

2.2.1. Hazardous Waste Related Job Description

1. Conducts duties in a safe and compliant manner.
2. Supervises other supervisors, hazardous waste technicians, and/or drivers as necessary.
3. Reports to another supervisor or a professional.
4. May participate in wastestream approval.
5. May provide guidance to other supervisors or hazardous waste technicians on the storage of materials.
6. May provide guidance to other supervisors or hazardous waste technicians on the management of difficult-to-process materials.
7. May prepare hazardous waste for off-site shipment.
8. May participate in hazardous waste treatment activities.
9. May sample, analyze, process, or transfer hazardous waste.
10. May maintain equipment involved in the sampling, analysis, processing, or transfer of hazardous waste.
11. May conduct inspections and identify approved non-USDOT containers.
12. May supervise or conduct the consolidation of liquid or solids materials as allowed by the permit (see Permit Attachment C, Container Storage and Consolidation Plan).
13. May supervise or conduct solids (filter cake) blending.
14. May review the relevant properties of adsorbents and document that adsorbents are safe and effective, and compatible (e.g., produces no deleterious gases or other bi-products) with the hazardous waste.

2.2.2. Requisite Skill, Education, or other Qualifications

1. High school diploma or equivalent.
2. College education preferred.
3. Previous experience in hazardous waste field preferred.
4. Management experience preferred.

2.2.3. Initial Training

1. Introduction to RCRA
2. Definition of Hazardous Waste
3. Contingency Plan
4. Outgoing Manifest Completion
5. Incoming Manifest Review
6. Container Management and Storage Area Standards
7. Satellite Accumulation Standards
8. Preparedness and Prevention
8. Land Disposal Restrictions
9. Materials Consolidation & Bulking
10. Solids (Filter Cake) Blending
11. Waste Analysis Plan

2.2.4. Annual Training

1. Contingency Plan
2. Outgoing Manifest Completion
3. Incoming Manifest Review
4. Container Management and Storage Area Standards
5. Satellite Accumulation Standards
6. Preparedness and Prevention
7. Land Disposal Restrictions
8. Materials Consolidation & Bulking
9. Solids (Filter Cake) Blending
10. Waste Analysis Plan

2.3. Hazardous Waste Technician (Document Control Specialist, Material Handler)

2.3.1. Hazardous Waste Related Job Description

1. Conducts duties in a safe and compliant manner.
2. Reports to another hazardous waste technician, supervisor, or professional.
3. Performs duties as assigned by supervisor.
4. May complete appropriate recordkeeping.
5. May sample, analyze, process, or transfer hazardous waste.
6. May prepare hazardous wastes for off-site shipment.
7. May maintain equipment involved in the sampling, analysis, processing, or transfer of hazardous waste.
8. May conduct inspections and identify approved non-USDOT containers.
9. May conduct the consolidation and/or bulking of liquid or solids materials as allowed by the permit (see Permit Attachment C, Container Storage and Consolidation Plan).
10. May conduct solids (filter cake) blending

2.3.2. Requisite Skill, Education, or other Qualifications

1. High school diploma or equivalent.

2.3.3. Initial Training

1. Introduction to RCRA
2. Definition of Hazardous Waste
3. Contingency Plan
4. Container Management and Storage Area Standards
5. Outgoing Manifest Completion
6. Incoming Manifest Review
7. Materials Consolidation & Bulking
8. Solids (Filter Cake) Blending

2.3.4. Annual Training

1. Contingency Plan
2. Container Management and Storage Area Standards
3. Outgoing Manifest Completion
4. Incoming Manifest Review
5. Materials Consolidation and Bulking
6. Solids (Filter Cake) Blending

2.4. Driver

2.4.1. Hazardous Waste Related Job Description

1. Conducts duties in a safe and compliant manner.
2. Moves hazardous waste with a motor vehicle.

2.4.2. Requisite Skill, Education, or Other Qualifications

1. High school diploma or equivalent.
2. CDL required for any over-the-road duties.

2.4.3. Initial Training

1. Introduction to RCRA
2. Definition of Hazardous Waste
3. Contingency Plan
4. Outgoing Manifest Completion

2.4.4. Annual Training

1. Contingency Plan
2. Outgoing Manifest Completion

3. TRAINING CONTENT, FREQUENCY, AND TECHNIQUES

3.1. Training Content and Administration

The training modules are included in Appendix F-A for reference. The Environmental Compliance Manager will lead each class.

3.2. Training Frequency

The initial training will be provided within six months of an employee's start date or transfer to another job description. The employee will not work in an unsupervised position until the training has been completed.

Annual training on each subject will be conducted and documented in 12-month intervals, plus or minus 3 months.

3.3. Training Techniques

Heritage has chosen in-house training as the optimum training technique. The niche Heritage occupies in the hazardous waste business is unique and does not lend itself to standardized ("boilerplate") training conducted commercially. In-house training is better suited to address the varying levels of experience possessed by Heritage employees and the specific situations that may be encountered by Heritage employees.

Training may be accomplished by a classroom session with a qualified instructor, prepared media (e.g., video or workbook), or proficiency examination or quiz.

3.4. Training Records

Records documenting that the required training has been provided and completed by facility personnel within the required time frames are maintained by the Training Director. Records are stored on site at the Coolidge facility.

4. TRAINING DIRECTOR

The Training Director for the hazardous waste training conducted for facility employees is identified as the Environmental Compliance Manager. The Environmental Compliance Manager position is considered a "Professional" as described in Section 2.1 this Plan. The Environmental Compliance Manager has adequate training and experience to fulfill the duties of Training Director. The Training Director is responsible to monitor the type, quality, and quantity of training. The Environmental Compliance Manager will also possess a 4-year college degree, at least five years of experience in the environmental field, and a professional certification (e.g., CET).

5. TRAINING FOR EMERGENCY RESPONSE

Heritage has formed an Emergency Response Team (ERT) composed of three levels of responders. All hazardous waste workers whose job descriptions are provided in Section 2 of this Plan are Level I ERT members. Level I is an awareness level. All hazardous waste workers are trained in the Contingency Plan. Therefore, they are qualified as Level I team members. The duties and additional training for Level II and Level III ERT members are described below.

5.1. Level II Emergency Response Personnel

5.1.1. *Hazardous Waste Emergency Response Job Description*

Level II team members are responsible for ensuring that any evacuation is complete. They are also responsible for control and security of the facility. Level II team members assist Level III team members in obtaining emergency equipment, donning personal protective equipment, and decontamination procedures.

5.1.2. *Required Training*

Level II employees will be trained for the following activities:

1. Evacuate all or part of the facility.
2. Activate fire alarm system.
3. Close spill gates.
4. Ensure evacuation complete.
5. Monitor access gates.
6. Direct outside authorities.
7. Gather response and decontamination equipment.
8. Direct media to appropriate management level.
9. Staff control center.
10. Distribute communication equipment.
11. Assist Level III employees (don equipment, etc.).
12. Perform other duties as assigned by the Emergency Coordinator.

5.2. Level III Emergency Response Personnel

5.2.1. *Hazardous Waste Emergency Response Job Description*

Level III ERT members are responsible for the actual control and remediation of the spill, fire, or explosion.

5.2.2. *Required Training*

Level III employees will be trained for the following activities:

1. Rescue any injured persons.
2. Control and contain any release.
3. Assist external (e.g., fire department) Hazmat team(s).
4. Perform other duties as assigned by the Emergency Coordinator.

APPENDIX F-A
TRAINING MODULES

INTRODUCTION TO RCRA TRAINING MODULE

1. Hazardous Waste Management (HWM) Program Overview
2. Resource Conservation and Recovery Act (RCRA), as amended
3. Federal HWM System Regulations
4. State RCRA authorization issues
5. Heritage operates under federal and state RCRA (Part B) permits
6. Clean Air Act and Clean Water Act permits
7. Federal, state, and local regulatory agencies

DEFINITION OF HAZARDOUS WASTE TRAINING MODULE

1. Lists of Hazardous Waste
 - a. Non-specific sources (F-list)
 - b. Specific sources (K-list)
 - c. Commercial Chemical Products (U- and P-lists)
 - d. Mixture and Derived-from Rules

2. Characteristics of Hazardous Waste
 - a. Ignitability
 - b. Corrosivity
 - c. Reactivity
 - d. Toxicity

CONTINGENCY PLAN TRAINING MODULE

1. Actions of facility personnel in response to hazardous waste emergencies
 - a. Spills/leaks/releases
 - b. Fires
 - c. Explosions

2. Arrangements made with local authorities
 - a. Fire/police departments
 - b. State and local response teams
 - c. Contractors
 - d. Hospitals/ambulance services

3. Emergency coordinators
 - a. List of names, home addresses, office and home telephone numbers
 - b. Must be competent and have authority to commit resources
 - c. At least one emergency coordinator must be on-site or on-call

4. Emergency equipment list
 - a. Location
 - b. Physical description
 - c. Outline of capabilities

5. Evacuation Plan
 - a. Signals
 - b. Routes
 - c. Alternate routes

**OUTGOING MANIFEST COMPLETION
TRAINING MODULE**

1. General Information
2. Steps to Manifest Completion
3. Federal General Manifest Regulations
4. State Manifest Guidelines

**INCOMING MANIFEST REVIEW
TRAINING MODULE**

1. General Information
2. Procedure for review of incoming manifests
3. Procedures to make any changes

CONTAINER MANAGEMENT AND STORAGE STANDARDS TRAINING MODULE

1. Containers must be in good condition.
2. Containers must be compatible with the waste.
3. Containers must be labeled or marked clearly with the words "Hazardous Waste."
4. Containers must be marked with the accumulation start date / LDR start date.
5. Containers must be closed, except when adding or removing waste.
6. Containers must be managed to avoid damage and releases.
7. Incompatible wastes are not to be placed in the same container.
8. Ignitable/reactive wastes must be 50 feet from the property line.
9. "No Smoking" signs must be posted in areas where there are ignitable/reactive wastes.
10. Incompatible wastes are to be separated or protected from each other by means of a dike, berm, wall, or separated by sufficient distance.
11. Adequate aisle space is to be maintained between rows of containers.
12. Inspect container staging, accumulation, and storage areas and emergency equipment as required by the permit.
13. Review the Subpart BB Plan as written (Permit Attachment L).
14. Review the Subpart CC Inspection and Monitoring Plan as written (Permit Attachment H).
15. Always use USDOT approved containers or acceptable non-USDOT containers.

SATELLITE ACCUMULATION TRAINING MODULE

1. Satellite Accumulation Points

- a. Areas "at or near any point of generation where wastes initially accumulate, which are under the control of the operator of the process generating the waste."
- b. Satellite accumulation points are not subject to the 90-day accumulation standards that apply to central accumulation/storage areas.

2. Requirements

- a. Wastes must be placed in containers that are in good condition.
- b. Wastes must be compatible with the containers.
- c. Containers must always be closed, unless wastes are being added or removed.
- d. Containers must be marked with the words "Hazardous Waste" or other words that identify the contents of the containers.
- e. Accumulation limit of 55 gallons of hazardous waste (1 qt. of acutely hazardous waste) per satellite area.
- f. Containers must be marked with the accumulation start date when "excess accumulation" begins (when the container is filled to capacity).
- g. Full containers must be moved to 90-day accumulation area within 3 days after being filled to capacity.

PREPAREDNESS AND PREVENTION TRAINING MODULE

1. Maintenance and operation of the facility so as to minimize the possibility of fire, explosion, or unplanned release.
2. Provision of certain required equipment:
 - a. Internal communications or alarm system;
 - b. Telephone or two-way radio;
 - c. Portable fire extinguishers, fire control equipment, spill control and decontamination equipment;
 - d. Water at adequate volume and pressure.
3. Testing and maintenance of equipment.
4. Access to communications or alarm system.
5. Aisle space required to allow emergency response.
6. Review the Procedures to Prevent Hazards (Permit Attachment D) as written.
7. Review the Contingency Plan (Permit Attachment E) as written.
8. Review of Compressed Flammable Gas Safe Handling Practices

LAND DISPOSAL RESTRICTIONS TRAINING MODULE

1. Determine for each hazardous waste generated whether it is currently subject to the land disposal restrictions.
2. Determine at the point of generation all applicable waste codes (listings and characteristics), the category (wastewater or non-wastewater), appropriate subcategories (if any) for each restricted waste, and underlying hazardous constituents, as applicable.
3. Determine all applicable treatment standard(s) and any prohibition level(s) for each restricted waste. Treatment standards typically distinguish between wastewaters and non-wastewaters.
4. Determine through specified analytical techniques or knowledge of the waste whether the treatment standard has been achieved. Analysis is either on a total constituent basis or on a TCLP extract.
5. Comply with storage time limitations (1-year presumptive maximum for permitted storage facilities or 90 days for generator/accumulators).
6. Comply with prohibitions on evaporation and/or dilution of restricted wastes as a substitute for adequate treatment. Comply with prohibitions on switching wastes from wastewater to non-wastewater forms.
7. Prepare notifications, demonstrations, and certifications required for onsite or offsite waste management:
 - a. When sending wastes off-site for treatment, notify treatment facility of waste codes and category and specify subcategory and underlying hazardous constituents, as applicable.
 - b. When sending offsite any wastes that meet BDAT concentration levels or have been treated by the specified technology, provide a notice and certification that the waste meets the applicable treatment standards.
 - c. For characteristic waste treated so as to become non-hazardous and being sent to a Subtitle D facility, provide a notice and certification to the EPA Regional Administrator or to the authorized state.
 - d. When sending offsite any wastes subject to extensions or variances, provide a notice stating that the waste is not currently subject to the land disposal restrictions.
 - e. For restricted waste excluded/exempted from regulation subsequent to the point of generation, place a notice in the files identifying such wastes, along with their ultimate disposition.
8. Maintain copies of all notices, certifications, demonstrations, waste analysis data, and other documentation (for knowledge of waste-based determinations) for at least five years from the date the waste was last sent to onsite or offsite treatment, storage, or disposal. Document where restricted waste was treated, stored, or disposed (applies to both off-site and on-site management).

USED OIL TRAINING MODULE

Definition of Used Oil

Rebuttable Presumption

- TX < 1000
- TX > 1000 could be F001/F002 (consider solvent scan)

MATERIALS CONSOLIDATION & BULKING TRAINING MODULE

1. No consolidation will occur until containers have been sampled according to the Waste Analysis Plan (Permit Attachment B), count verified, containers bar-coded, and paperwork signed off.
2. Containers to be consolidation will be staged at the consolidation area and consolidated into the container assigned by a Professional or Supervisor.
3. Containers can be consolidated according to the conditions in the permit (see Permit Attachment C - Container Storage and Consolidation Plan).
4. Proper grounding and bonding procedures are to be used where applicable.
5. Scan containers to the consolidation container as they are consolidated.
6. Wastes may be consolidated by pumping, pouring, dumping, or scooping.
7. Don proper PPE as indicated in the most current Personnel Protective Equipment Guidelines prior to performing consolidation activities.
8. Review the applicable facility Standard Operating Procedure (SOP) for consolidation and the Heritage Thermal Services packing guidelines as written.

If bulking organic wastes,

9. Inspect consolidation equipment, including housekeeping tools, prior to use.
10. Employees will work in pairs under the direct supervision of an experienced Field Chemist.
11. Stage consolidation container on spill pallet.
12. Fire extinguisher must be nearby at all times.
13. Combine representative samples from each container under fume hood to ensure compatibility.
14. Provided each container to be combined is compatible, the smaller containers can be combined in the consolidation container.
15. Periodically check temperature of the consolidation container with a heat gun. If significant temperature change, cease operations immediately. Notify Facility Manager, and continue to observe container for safety.

If consolidating filter cake (typically for off-site metals reclamation), see Solids (Filter Cake) Blending training module.

**WASTE ANALYSIS PLAN
TRAINING MODULE**

1. Review the Waste Analysis Plan (Permit Attachment B) as written.

SOLIDS (FILTER CAKE) BLENDING TRAINING MODULE

1. No blending will occur until containers have been sampled according to the Waste Analysis Plan (Permit Attachment B), count verified, containers bar-coded, and paperwork signed off.
2. Incoming materials will be screened for toxic metals, cyanides, VOCs, and moisture content (free liquids).
3. Containers to be blended will be staged at the Rolloff Container Storage Area and blended into the container assigned by a Professional or Supervisor.
4. Containers can be blended according to the conditions in the permit (see Permit Attachment C – Container Storage and Consolidation Plan).
5. Scan containers to the blend (product) container as they are blended.
6. Wastes may be blended by pouring, dumping, or scooping.
7. Inspect backhoe and associated bucket daily before each use.
8. Don proper PPE as indicated in the most current Personnel Protective Equipment Guidelines prior to performing blending activities.
9. Always use adsorbents whose properties have been reviewed by a qualified professional, and who has documented that the adsorbents are safe and effective, and compatible (e.g., produces no deleterious gases or other adverse bi-products) with the hazardous waste.