

ATTACHMENT 5 PERSONNEL TRAINING

5.0 Abstract

OBJECTIVE: The purpose of training is to familiarize employees with environmental regulations, records, and emergency procedures so they can perform their jobs in the safest and most efficient manner possible. The program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems.

TIME OF TRAINING

Job Title	Prior to Starting Work	On the Job	Annually	When Regulations and/or Procedures Change
Branch Manager	X		X	X
Branch Secretary		X	X	X
Branch Sales Manager	X	X	X	X
Customer Service Representative	X	X	X	X
Material Handler	X	X	X	X

5.1 Outline of Training Program

Each employee is trained to operate and maintain the facility safely, and to understand hazards unique to his or her job assignment. New facility managers must complete an introductory training program before starting their jobs, with annual review and update thereafter. Appendix H contains information on service center personnel (“Branch Organization Charts”), “Job Descriptions,” “Training Plan Outlines,” and “Training Record Forms.”

5.2 Organization Structure and Job Descriptions

The Safety-Kleen Environment, Health, and Safety Department trains all regional managers annually. It is the responsibility of the regional manager or a qualified designee (i.e., EHS staff) to ensure that the branch manager is trained and that the branch manager trains all branch personnel. Environmental compliance and training of facility employees is the responsibility of the facility manager’s Job description that highlight’s typical functions for branch personnel associated with hazardous waste management are in Appendix H.

5.2.1 Branch Manager

The branch manager serves as the overall facility manager and is ultimately responsible for the operations at the facility. The sales and service representatives, secretaries, and warehousemen (material handlers) report to the branch manager. The branch manager must provide the training

and materials necessary for the branch employees to execute their duties. With respect to environmental compliance, he/she must:

- a. Keep the facility clean and orderly;
- b. Execute or designate an employee to execute the daily inspection, keep a written log and remediate any problems;
- c. Know the potential hazards of the material and wastes handled on site;
- d. Identify potential spill and fire sources and be able to execute the contingency plan;
- e. Inform all employees of their environmental responsibilities;
- f. Notify the proper authorities during an emergency, remediate the situation to the best of his/her abilities, and submit necessary reports to the corporate office; and
- g. Maintain all environmental records (such as manifests, training records, and analytical results and spill reports) on file.

5.2.2 Regional Manager

The Regional Manager or qualified designee oversees the operations of several service centers in a geographic area. Branch managers report to a regional manager who must verify that the branch managers are operating their facilities in compliance with environmental regulations as well as Safety-Kleen's internal standards. With respect to environmental compliance, the regional manager or qualified designee must, at a minimum:

- a. Perform a quarterly inspection of each branch in his or her region to review record keeping and maintenance practices,
- b. Verify annual training session for branch managers (usually trained by Environmental, Health, and Safety staff),
- c. Ensure that the branch manager is training branch employees,
- d. Make certain that the contingency plan and remedial actions have been properly executed for any emergency, and
- e. Assume the responsibilities of the branch operations in the absence of the branch manager.

5.2.3 Environmental, Health, And Safety Department

Safety-Kleen's Environmental, Health, and Safety Department operates out of the corporate office in Plano, Texas. Each regional Environmental, Health, and Safety staff manages the training, permits, and other compliance issues for the branches in a geographic area of the country. The Department must:

- a. Execute training of the regional managers and branch managers in accordance with environmental regulations and corporate policy,
- b. Notify the proper authorities, oversee remedial actions, and submit written reports to regulators after an emergency situation has occurred,
- c. Assure that environmental permits are submitted and updated as required, and
- d. Manage any environmental compliance issues which exceed the resources available at the branch or regional level.

5.2.4 Training Director and Training Staff

As required by 40 CFR 264.16(a)(2), the entire classroom and on-the-job training program is directed by a person trained in hazardous waste management procedures. This is to ensure all necessary elements are included in the program. The person in charge of the training program is:

- Corporate Vice President of Environmental Affairs: Mr. Lin Longshore

When this person changes, a “Character/Background Reference For Hazardous Waste Facility Owners, Officers, Directors, Partners, And Key Employees” must be completed and submitted accompanied by a permit modification, pursuant to Permit Condition I.J “Permit Modifications”.

In addition to the above training director requirements, all training staff who provide hazardous waste training to employees must also be trained in waste management procedures. Unique training which requires specific facility knowledge will only be provided by individuals who have obtained that specific knowledge through training or other equivalent means.

5.3 Description of the Training Program

Employee training may be accomplished using both classroom and on-the-job methods. Safety-Kleen’s Environmental, Health, and Safety Department trains regional managers and branch managers. Each regional manager or a qualified designee also verifies and may conduct training of his or her branch managers.

An employee is trained prior to starting or as soon as he or she begins working, (depending on his or her position), and annually thereafter. Regional managers are never new employees in that they are promoted from within the company. “Training Plan Outlines” are in Appendix H-3.

All employees must successfully complete the initial training program within six (6) months, as described in, and pursuant to, AAC R-18-8-264.A (40 CFR 264.16(b)), before that person can work unsupervised.

5.3.1 Training of New Branch Managers

New branch managers are trained before they begin their new positions. This training includes both onsite, on-the-job, and offsite classroom training. While being trained at a designated “training facility,” the new branch manager reviews all environmental records and learns the record keeping requirements. These records include: manifests, personnel records, training records, facility inspection records, and spill reports.

The training culminates with additional training at his/her new facility, at the direction of an environmental professional. This training includes at a minimum, a review of the Hazardous Waste Permit, including the Waste Analysis Plan, Preparedness and Prevention Plan, Contingency Plan, Training Plan and Closure Plan. This training is outlined in Appendix H-3. Additional time is spent reviewing past environmental compliance at the branch manager’s facility and regulations unique to the state are discussed as well.

5.3.2 Training of New Office Staff

“Office staff” is defined as various levels of secretaries and clerical staff that work at the facility. Office staff are trained in the proper record keeping procedures as soon as they begin working for Safety-Kleen. While they are not usually responsible for preparing the documentation, they must check it for accuracy and completeness and then process it as required. Additional training is overseen by the branch manager and is done within six months of starting work. It includes some of the items listed in the “Training Plan Outline” (Appendix H-3) that may be applicable to the office staff jobs. In addition, the contingency plan must be reviewed with the branch manager within the first two weeks of the secretary or clerk starting work.

5.3.3 Training of New Branch Sales Managers

A branch sales manager is a middle management position created to supervise the sales force within a specific line of services. The sales manager position will be particular to a specific line of Safety-Kleen business and will be filled according to the needs of the facility. The primary goal of this position is to direct and assist the branch manager in attaining sales goals in a specific line of business which Safety-Kleen offers. The sales manager supervises the sales aspect of the sales representative position. Though most training for this position is within the area of sales, the sales manager may also be trained as the designate for performing the facility inspection. Additional training may be provided in the form of videotape presentations. The contingency plan must be reviewed with the facility manager before the sales representative formally begins their new position and annually thereafter. Items listed in the example training outline (Appendix H-3) are explained within six months of starting.

5.3.4 Training of New Customer Service Representatives

New customer service representatives are trained in regulatory issues, including manifests, facility inspection records and training records. A customer service representative may also be trained as the designee for performing the facility inspection. Additional training may be provided in the form of videotape presentations. The contingency plan must be reviewed with the facility manager before the sales representative formally begins their new position and annually thereafter. Items listed in the example training outline (Appendix H-3) are explained within six months of starting.

5.3.5 Training of New Warehousepersons (Material Handler)

A warehouseperson is trained to maintain the service center and assist the other branch employees in their tasks. This person may also be a designate for the facility inspection and must be trained by the branch manager as such. Before the warehouseperson's starts working, the branch manager must review the contingency plan with him/her, and within six months the items listed in the example training outline (Appendix H-3) must be reviewed.

5.3.6 Annual Training

On an annual basis, regional managers and branch managers are trained using a program prepared and updated annually by the Safety-Kleen's Environment, Health, and Safety Department in a two-day session which concludes with a certification test. This class includes

updates on environmental regulations, an in-depth review of the contingency plan and a review of RCRA inspection criteria.

Facility employees must annually review the items listed in the Training Plan Outline for Branch Employees,” Appendix H-3. This review may be in the form of videotapes and a review and discussion of the storage facility permit. In addition, periodic memoranda on changes in environmental regulations are issued by the Safety-Kleen Environment, Health, and Safety Department and must be read and discussed by facility personnel. The training is recorded on the “Record of Personnel Training” in Appendix H-4.

5.4 TRAINING RECORDS

Employee training is documented using the forms in Appendix H-4 “Training Record Forms.” Training records are kept until closure of the facility, and or three (3) years from the date an employee is terminated from the facility. Personnel training records will accompany personnel transferred within Safety-Kleen.