

ATTACHMENT F
TRAINING PLAN

1.0 INTRODUCTION

VES's policies, procedures, and practices related to employee training have been designed in accordance with the requirements of A.A.C.R18-8-70.A (40 CFR 270.14(b) (12), 40 CFR 122.25(a) (12), 40 CFR 264.16, and A.A.C. R18-8-264.16). The training described in this section also complies with Occupational Safety and Health Act (OSHA) requirements specified in 29 CFR 1910.120.

Training of personnel is completed to instruct and refresh employees on performing operations that maintain facility compliance. The program is directed by the General Manager and includes training on handling procedures, Contingency Plan implementation, and emergency response. The level of training is dependent on the job title and area of responsibility relative to hazardous waste management.

The primary objectives of the training program are as follows:

- To make employees aware of the potential hazards they may encounter.
- To provide the knowledge and skill training necessary to protect employee health and safety and the environment.
- To make workers aware of the purpose and the limitations of process and safety equipment.
- To ensure that workers can respond to emergencies.

2.0 OUTLINE OF TRAINING PROGRAM

2.1 Job Titles and Duties

A list of job titles and employees is maintained onsite by the General Manager of VES. Job descriptions for each position are included in Exhibit F-1, herein.

2.2 Training Course Frequency and outlines

Employees receive the initial training within 6 months after the date of their employment or assignment to a new position at the facility as required by A.A.C.R18-8-264.A (40 CFR 264.16(b)). Facility personnel participate in an annual review of the initial training and updating training sessions, so that they may be informed of changes in facility processes, procedures, emergency equipment, or emergency response procedures as required by A.A.C.R18-8-264.A(40 CFR 264.16(c)).

The policy, procedures and practices related to employee training have been designed to meet the requirements of RCRA as well as the Occupational Safety and Health Act (OSHA). The training program includes information on the training content, frequency, and techniques, and emphasizes training related to emergency response.

2.2.1 Training Topics

VES employees are required to attend a formal training program that is managed by the Production Manager. This program includes the following main topics, which are detailed out in the table on the following page.

- OSHA 24-Hour Training
- OSHA First Responder Training
- Hazard Communication Training
- General Safety Awareness Training

FORMAL TRAINING PROGRAM	
OSHA 24-Hour Training	OSHA First Responder Training¹
<ul style="list-style-type: none"> ▪ Responsibilities for health and safety on a site ▪ Chemical, physical, and biological hazards ▪ Mercury toxicology ▪ PCB toxicology ▪ Use of personal protective equipment ▪ Work practices ▪ Safe engineering controls ▪ Medical surveillance ▪ Site safety and health plans/emergency response plans ▪ Spill containment ▪ Hazard monitoring ▪ Regulations 	<ul style="list-style-type: none"> ▪ Hazards of mercury and PCBs ▪ Understanding of the potential outcomes associated with an emergency ▪ Recognition of presence of a hazardous substances ▪ Understanding of the role of a first responder in VES's Contingency Plan ▪ Ability to realize the need for additional resources to contact the appropriate personnel at VES ▪ Basic hazard and risk assessment techniques. ▪ Selection and use proper personal protective equipment. ▪ An understanding of the basic hazardous materials terms. ▪ Basic control, containment and/or confinement operations within the capabilities of VES. ▪ Implement basic decontamination procedures. ▪ VES standard operating procedures.
Hazard Communication Training¹	General Safety Awareness Training¹
<ul style="list-style-type: none"> ▪ General provisions of the Hazard Communication Standard ▪ Hazardous chemical information (PCBs and Mercury emphasized) ▪ How to read Material Safety Data Sheets ▪ Routes of entry of chemicals ▪ Personal Protective Equipment including respiratory protection ▪ Hazardous waste management practices and procedures ▪ Emergency response procedures 	<ul style="list-style-type: none"> ▪ Management safety policy including safety meetings ▪ Walking and work surfaces ▪ Lifting and back safety ▪ General hygiene ▪ Hearing protection ▪ Machines and machine guards ▪ Portable equipment ▪ Lockout and tagout procedures ▪ Electrical safety ▪ Posters and signage ▪ Fire protection

2.2.2 Annual Refresher Training

All employees receive an 8-hour annual refresher training covering the following topics:

Annual 8-Hour Refresher:
<ul style="list-style-type: none">▪ Responsibilities for health and safety on a site▪ Chemical, physical, and biological hazards▪ Mercury and PCB toxicology▪ Use of PPE▪ Site safety and health plans/emergency response plans▪ Spill containment▪ Hazard monitoring▪ Regulations

2.2.3 Course Materials

Course materials will be developed by the course instructor and appropriate for the audience to be trained. Course materials may include hand-outs, audio-visual aids such as video tapes or PowerPoint presentations, and samples of actual equipment.

2.2.4 Relevance of Training to Job Position

Job-specific training is best handled for the average employee by training sessions and on-the-job training administered and supervised by competent management personnel. The specific training required for each position is provided on each job description.

2.3 Training Director

The General Manager is responsible for oversight of the employee training program.

2.4 Training for Emergency Response

VES's training program meets the minimum requirements of RCRA emergency response training as follows (40 CFR 264.16(a) (3) :

- Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment – relevant information about emergency equipment is presented in the Hazard Communication training.
- Key parameters for cut-off systems – this is not applicable to the VES facility.
- Communications and alarms systems – information on the use of the communications and alarm system is presented in Hazard Communication training.

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- Responses to fires and explosions, as well as other types of emergencies, are described in the Contingency Plan. Personnel are trained in the proper response and use of equipment, relative to their hazardous waste responsibilities
 - Response to groundwater contamination incidents - this is not applicable to the VES facility.
 - Site evacuation procedures - site evacuation procedures are described in the Contingency Plan. Personnel are trained in evacuation routes and assembly areas.
 - Shut-down of operations – procedures for shutting down facility operations are included in Hazard Communication training.

3.0 IMPLEMENTATION OF TRAINING PROGRAM

Experienced employees complete training as an annual review. New employees complete initial training within 6 months of the date of assignment/employment. Employees are not allowed to work in the facility in unsupervised positions until they have completed the training requirements.

VES documents compliance with prescribed training standards by maintaining detailed personnel training records. As required by 40 CFR 264.16(d), VES maintains the following documents and records:

- A list of the job titles for each position at VES related to hazardous waste management, and the name of the employee filling each job (40 CFR 264.16(d)(1));
- A written job description for each position. The description includes the requisite skill, education, or other qualifications, and duties of employees assigned to each position. (40 CFR 264.16(d)(2));
- A written description of the type and amount of introductory and follow-up training given to each employee. (40 CFR 264.16(d)(3));
- Records documenting that the required training or job experience has been given to or completed by facility personnel. (40 CFR 264.16(d) (4)).

VES maintains a training matrix provided in Exhibit F-2 that lists employee job titles and required initial and continuing training. Training records are kept until closure of the facility. Training records of former employees are retained. Personnel training records may accompany personnel transferred within the company.

EXHIBIT F-1
JOB DESCRIPTIONS

JOB DESCRIPTIONS

1. General Manager

The General Manager is responsible for implementing management practices, reviewing current and future operations and facility design with respect to hazardous waste regulations, coordinating with senior staff (Advisors) on appropriate operational practices, recordkeeping, and reporting. The General Manager directs the production supervisor on operational and employee related issues.

Minimum requirements:

- Working knowledge of RCRA/TSCA/OSHA regulations
- Knowledge of Emergency Response Procedures
- Knowledge of facility operations and equipment

2. Operations Manager

The Operations Manager is responsible for overseeing the operations of 40-50 production personnel. This includes ensuring that all production workers are operating equipment safely and they are utilizing and wearing appropriate personal protective equipment while working. He is also responsible for inspecting all incoming hazardous material shipments in order to identify any potential discrepancies in waste type or quantity between the manifest and the actual material received.

Minimum requirements:

- Working knowledge of RCRA/TSCA/OSHA regulations
- Knowledge of DOT Hazardous Materials Regulations
- Knowledge of facility operations and equipment
- Knowledge of Emergency Response Procedures

3. Environmental Health & Safety Manager

The Environmental Health & Safety Manager is responsible for ensuring compliance with all federal and state regulations governing the operations of VES's Systems. This includes compliance with applicable environmental, safety, and DOT regulations. In addition, is responsible for training employees on applicable environmental and safety regulations.

Minimum Requirements

- Working knowledge of RCRA/TSCA/OSHA regulations
- Working knowledge of DOT hazardous materials regulations

- Working knowledge of applicable environmental regulations relating to hazardous materials
- Knowledge of state by state regulations concerning classification and transportation of mercury-containing lamps

4. Production Worker (Fluorescent Lamp Processing)

Lamp processing production workers are responsible for all operations associated with the lamp recycling line. This includes assisting the production manager in receiving and weighing inbound lamps; transferring lamps from receiving containers to special lamp processing bins; manually feeding lamps into the lamp crusher; and general housekeeping and maintenance of the processing area.

Minimum requirements:

- Knowledge of Emergency Response Procedures
- Knowledge of facility operations and equipment

5. Production Worker (Mercury Devices and Mercury Retort)

Production workers operating in the mercury retort room are specially trained to operate on this line. The production worker dismantles the mercury device into the smallest mercury-containing unit by employing various tools used to sever or break apart the device, depending on the nature of the material. Retort workers segregate the device into recyclable and miscellaneous waste products for disposal.

Minimum Requirements:

- Knowledge of Emergency Response Procedures
- Knowledge of facility operations and equipment
- Ability to classify recyclable and non-recyclable materials

EXHIBIT F-2
TRAINING MATRIX

TRAINING MATRIX

Job Title	Train-the-Trainer	Hazwoper	Hazard Communication	Forklift Driver	First Responder
General Manager		✓	✓		✓
Operations Manager		✓	✓	✓	✓
Environmental Health & Safety Manager	✓				
Production Worker (lamps)		✓	✓	✓	✓
Production Worker (retort)		✓	✓		✓