

ATTACHMENT H
PERSONNEL TRAINING
[270.A (270.14(b)(12))]

SECTION H

PERSONNEL TRAINING

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H. PERSONNEL TRAINING

This portion of the RCRA Part B permit application has been prepared to fulfill the requirements of A.A.C. R18-8-270.A and 264.A (40 CFR 264.16 and 270.14(b) (12)). This training program consists of initial and continuing training for all facility personnel involved in hazardous waste management. A variety of training techniques are utilized including classroom instruction with live instructors or videotapes, participatory webcast, prepared written modules, on-the-job training, safety meetings and drills. All facility personnel complete the initial training program within six months of their date of hire.

H.1 TRAINING PROGRAM CONTENT, FREQUENCY AND TECHNIQUES

The Clean Harbors Director of Internal Regulatory Training oversees a dedicated training department that prepares training materials for use throughout the company. Each facility can amend the training materials to fit the site-specific conditions. The training is administered at each site by a combination of the Environmental Manager, the Health and Safety Manager, the Facility Manager, or a designee. The designee could be an experienced onsite worker, a Clean Harbors professional trainer or a contracted trainer. Any instructor serving as a trainer will be qualified in hazardous waste management procedures through training and/or experience to teach the subject matter. Outside contractors may be used for some training sessions as well.

Clean Harbors' training program is comprised of initial on-the-job training and initial and annual classroom training for all facility employees involved in hazardous waste management. The training program covers RCRA and ADEQ regulations, personal safety, hazardous waste operations and processes specific to this facility, and emergency procedures. The specific training topics depend on the job assignments. In addition, all facility personnel involved in hazardous waste management attend an Occupational Safety and Health Administration (OSHA) 24-hour Health and Safety Training course.

The On-the-Job training program is described in a written plan maintained at the facility. On-the-job training is provided for all employees when they first start work at the facility. On-the-job training will last from several days to several weeks, depending on the type of job and experience and progress of the new employee. New employees will participate in on-the-job training with an individual who works in their particular area or the area supervisor. On-the-job training familiarizes the employee with operations, procedures, and equipment specific to his/her position. It may include any of the following types of subjects:

- Forklift operations;
- Container handling procedures;
- Waste Analysis Plan Requirements;
- Compatibility testing (bucket test);
- Laboratory analysis techniques;
- Other permits and their requirements;
- Contingency Plan;
- Site security;
- Record keeping procedures; and
- Treatment and transfer operations.

Classroom training provided by the facility is described in a written plan maintained at the facility or electronically. The modules in the plan may change over time to reflect regulatory changes and changes in on-site hazardous waste management operations. The specific topics or modules that each employee receives vary, depending on his or her job title. Each job title is placed into an employee group that receives similar training, a training matrix is provided in Appendix H-1. Appendix H-2 contains an organizational chart along with job descriptions. The training matrix and job descriptions are subject to change which will depend on the volume of staff and the volume of work being performed at the facility. Each employee signs an attendance sheet that is filed with the training records. An electronic training roster is used to record all corporate sponsored training. The corporate training is provided for all personnel on a monthly or annual basis and is modified to reflect site specific situations. It is a comprehensive program that reaches all employees.

Additional job-specific training may be completed by facility personnel as needed. This training may be conducted on-site or off-site. In addition, employees may receive new training as facility equipment or operations change. Facility employees also attend periodic safety meetings that focus on particular site specific safety concerns.

New personnel will be trained within six months after their date of employment. New employees are required to complete the 24-hour HAZWOPER health and safety training course prior to performing hazardous waste management duties, in accordance with OSHA 1910.120. New personnel will work under the direction of a supervisor trained and experienced in site operations until on-the-job training has been completed and the employee shows through his actions that he understands the new job function.

H.2 TRAINING FOR EMERGENCY RESPONSE

All facility personnel are trained to respond effectively to emergency situations. Some of the emergency response topics discussed includes:

- Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment; personnel will be trained to inspect all facility emergency and monitoring equipment to mitigate the effects of equipment failure. In addition, personnel are trained in the use of emergency equipment at their job site (e.g., fire extinguishers, respirators, etc.)
- Key parameters for waste feed cut-off systems: Operations personnel will receive training in the use of pumps, valves, and other devices which regulate waste flow in the tank farm area. Operations personnel will be trained in the volume of waste that can be fed into the processing units at one time. They will be trained in the precautions and procedures to implement in the event of a tank overflow.
- Communication or alarm systems: All facility employees are instructed as to the location and use of all telephones, intercoms and alarms as part of the Contingency Plan portion of training. Personnel working in hazardous waste operations will receive additional on-the-job instruction in the use of communication systems and alarm system particular to their respective area.
- Response to fires or explosions: All personnel at the facility receive basic instruction in fire prevention and response.

- Response to release of hazardous waste to the environment: All personnel receive instruction in spill and release prevention and response.
- Shutdown of operations: All personnel receive basic instruction in the shutdown of procedures. In addition, personnel with operational responsibilities are instructed in procedures for planned and unplanned shutdowns during on-the-job training.

APPENDIX H-1

TRAINING MATRIX FOR FACILITY POSITIONS

Clean Harbors Arizona, LLC Training Matrix for Facility Positions

Position Title	DOT Courses	EPA Courses	CHA SPECIFIC	HS Courses	OSHA Modules*
CHEMIST, RECEIVING	ET2002	ET2004, 3050	CHA01,02,03	HS2000	HS1041 - HS1048
COORDINATOR, RECEIVING or SHIPPING	ET2002	ET2004, 3050	CHA01,02,03	HS2000	HS1041 - HS1048
DRIVER, CLASS "A" or "B"	ET2002	ET2004, 3050	CHA01,02,03	HS2000	HS1041 - HS1048
FOREMAN, FACILITY, RECEIVING, LABPACK	ET2002	ET2004, 3050	CHA01,02,03	HS2000, 1025	HS1041 - HS1048
MAINTENANCE MANAGER	N	ET3050	CHA02	HS2000	HS1041 - HS1048
MANAGER, COMPLIANCE	ET2002	ET2004, 3050	CHA01,02,03	HS2000, 1025	HS1041 - HS1048
MANAGER, H&S	N	N	CHA02	HS2000, 1025	HS1041 - HS1048
MANAGER, FACILITY OR OPERATIONS	ET2002	ET2004, 3050	CHA01,02,03	HS2000, 1025	HS1041 - HS1048
MANAGER, HEALTH & SAFETY	N	ET3050	CHA01,02,03	HS2000, 1025	HS1041 - HS1048
REP., CUSTOMER SERVICE	ET2002	ET2004	CHA02	N	N
TECHNICIAN, FACILITY OR LABPACK	ET2002	ET2004, 3050	CHA01,02,03	HS2000	HS1041 - HS1048

Note: * Eight (8) OSHA Modules satisfy the requirements for the Annual HAZWOPER refresher

Course Legend:

- ET2002 DOT Regulation Haz Mat Empl.
- ET2004 Fed Motor/CH Policies and Proc
- ET3050 Annual RCRA Training
- HS2000 OSHA 24 Hour Hazwoper
- HS1025 Substance Abuse Supervisory TR
- HS1041 HAZCOM
- HS1042 Medical/Bloodborne
- HS1043 Respiratory Protection
- HS1044 Conf. Space/Heat stress
- HS1045 PPE/Hearing
- HS1046 Decontamination
- HS1047 Emergency Response
- HS1048 Drum & Material Handling
- CHA01 Waste Analysis Plan (including bucket test)
- CHA02 Contingency Plan & Site Security
- CHA03 Treatment and Transfer Operations
- N None Required

Course Category:

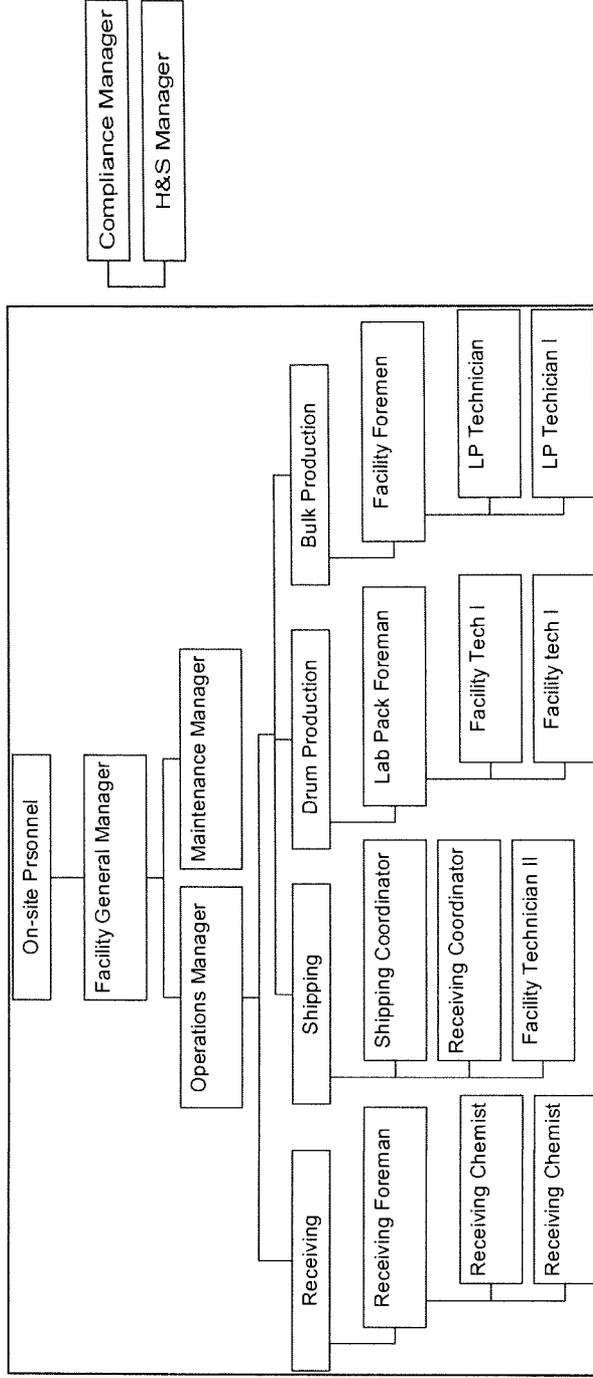
- DOT Courses Department of Transportation
- EPA Courses Environmental Protection Agency
- HS Courses Health and Safety
- OSHA Modules Occupational Health and Safety
- CHA Courses Permit Requirements

APPENDIX H-2

**FACILITY ORGANIZATION CHART
AND
JOB DESCRIPTIONS**



Clean Harbors Arizona, LLC Organizational Chart



APPENDIX H-3

INTERNAL COMPANY TRAINING POLICY

From

CLEAN HARBORS POLICY & PROCEDURES MANUAL

(Subject to change without notice)

General Policies & Procedures

Version 2, 11-1-00 supersedes Version 1, TR 14.1, 3-5-91

TR 1.0 Company Training Policy

1. Purpose

The Company Training Policy is intended to generate and support development of a company wide training program designed to achieve three objectives while training employees: competence, compliance, and cost effectiveness.

a. Competence

To ensure that employees are provided with the skills to perform safely and efficiently in the phases of the Company's operations in which they work.

b. Compliance

To provide training standards which meet or exceed all applicable DOT, OSHA, and EPA training requirements, including RCRA Part B Facility Training Plans. These standards will also satisfy or exceed all state, local, or provincial training requirements.

c. Cost Effectiveness

To establish a structure and format where Management in all divisions of the Company can achieve the required training for their employees in the most effective and cost-efficient manner with a minimum disruption to Company operations.

2. Statement of Policy

No Company employees shall be required or allowed to perform any unsupervised task or specific operations unless they have successfully completed the specific training requirements for their positions, as outlined in other Clean Harbors Guidelines, Policies and Procedures; by OSHA 1910.120 (HAZWOPER); 49 CFR 177.816; and other regulatory requirements. The employee must also have demonstrated their proficiency with trained supervisors.

3. Responsibility and Authority

It is the primary function of the Training Department to design and develop the training courses for individuals in all divisions of the Company. Because of the vast array of

General Policies & Procedures

Version 2, 11-1-00 supersedes Version 1, TR 14.1, 3-5-91

Company operations and the specialized nature of the curriculum, course development will be assisted by the Compliance Department and the Health and Safety Department as well as by other experts from within the Company.

It is the responsibility of the General Manager to ensure that all individuals are properly trained.

When demand for new training modules is generated, whether through requests from Company personnel, changes in government regulations, or updates in technologies or otherwise, the Training Department is responsible for developing new course material. The Compliance Department and Health and Safety Department will be relied upon as a support for keeping abreast of new regulations and technologies. New course materials will be submitted to the appropriate Vice Presidents and functional Managers for review and approval.

The Training Department is also responsible for maintenance and upkeep of all training course materials. Each location is the Office of Record for individual's hard copy training files which should contain all testing records, fit test forms, certificates of completion, etc. Original copies of attendance records should be maintained at the employee's location as well. A centralized database of all training records will be maintained in PeopleSoft HR.

Training records audits of each location will be performed by the Training Department, Health & Safety Department or Compliance Department on a periodic basis, with at least some of those audits consisting of visits to the location. At the conclusion of each visit, a report will be generated with copies sent to the General Manager, Regional Vice President, the Health & Safety Representative, Vice President of Technical Services and/or the Vice President of Site Services, and the Director of Compliance and the Training Department. The Training Department will be the Office of Record for the audit files.

4. Applications

This Policy applies to all Company operations. All training courses, whether internal or external, are tracked in the PeopleSoft HR database, and each course is assigned to a general category and specific code, including duration. When individuals attend specific training courses, the course code and date of attendance are entered into the database. Attendance is verified by the completion of a training document at the time of the course. Copies of the documents are forwarded to the Training Department and the originals are kept in the individual's training files at their work locations. All documents are to be entered and filed within one week of generation.

The information contained in this document is PROPRIETARY to Clean Harbors intended for the sole use of Clean Harbors personnel to conduct the business of Clean Harbors and is not to be distributed outside Clean Harbors without permission.

General Policies & Procedures

Version 2, 11-1-00 supersedes Version 1, TR 14.1, 3-5-91

The Training Department is responsible for identifying appropriate training courses for various employee groups, in consultation with the Health and Safety Department, Human Resources Department, Environmental Compliance Department, and other appropriate groups and Departments within Clean Harbors. However, the management at each location is responsible for coordinating employee attendance at required courses.

Each member of the training network which consists of the Environmental Compliance Department, General Managers, Health & Safety Representatives, the Training Department and Shared Service Administrators, has direct access to the PeopleSoft HR database to facilitate report generation for tracking. However, database additions or modifications can only be made by Training Department or by authorized employees. The process of reviewing and updating training documents will be ongoing.

5. Issuing Department and Contact

Issued by the Training Department. Conflicts, disagreements, or questions regarding specific training issues should be forwarded to the Manager of Training for resolution.

6. Procedures Derived from this Policy

Implementation of the Company Training Plan is primarily achieved by conducting the various core training courses. Specific Procedures have been developed to identify content, frequency, duration, and appropriate audience for each of these courses.

7. Sign-off Departments

Any modification of this Policy will require the prior approval of the Vice President of Technical Services, Director of Compliance, Director of Health and Safety, and the Training Manager.

APPENDIX H-4

**CLEAN HARBORS RCRA TRAINING MANUAL
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