

APPENDIX H
PERSONNEL TRAINING PLAN

1.0 INTRODUCTION

The purpose of this Personnel Training Program is to describe training provided to all US Ecology Burlington, Inc. (USEB) employees with waste management and/or emergency response duties. Additional training may be provided to meet other regulatory requirements or internal needs.

2.0 JOB TITLES, JOB DESCRIPTIONS and REQUIRED TRAINING

The job descriptions and training requirements for the various USEB positions with associated waste management or emergency response duties are described below.

2.1 Supervisor

2.1.1 *Job Description (as related to waste management)*

1. Conducts duties in a safe and compliant manner
2. Supervises senior waste technicians and waste technicians
3. Assigns work as necessary to maintain a functional and compliant facility
4. Interacts with environmental agencies and prepare/maintain documents required for compliance and/or maintained as part of the facility record
5. Oversees and approves waste information profile (“WIP”) approvals
6. Provides guidance to senior waste technicians and waste technicians on the proper management of waste materials
7. May arrange and schedule off-site waste shipments
8. May prepare wastes for off-site shipment
9. May conduct inspections in accordance with Section F of this permit
10. May conduct or schedule waste management training of USEB employees
11. Oversees implementation of the Waste Analysis Plan (Section C of this permit)
12. Oversees and may perform waste sampling, movement of waste into cells
13. Implements Contingency Plan as needed

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. Overview of RCRA, TSCA, Vermont Hazardous Waste Management Regulations and USEB’s Hazardous Waste Facility Certification
2. Overview of Hazardous Waste, Universal Waste and Used Oil Regulations
3. Waste Analysis Plan
4. Contingency Plan
5. Outgoing Manifest Procedures
6. Incoming Manifest Review
7. Container Management and Storage Area Standards
8. Satellite Accumulation Standards
9. Preparedness and Prevention
10. Land Disposal Restrictions
11. Non-Hazardous Solid Waste

2.1.4 *Annual Review of Training*

1. Overview of USEB's Hazardous Waste Facility Certification
2. Waste Analysis Plan
3. Contingency Plan
4. Outgoing Manifest Procedures
5. Incoming Manifest Review
6. Container Management and Storage Area Standards
7. Satellite Accumulation Standards
8. Preparedness and Prevention
9. Land Disposal Restrictions
10. Non-Hazardous Solid Waste

2.2 Senior Waste Technician

2.2.1 *Job Description (as related to waste management)*

1. Conducts duties in a safe and compliant manner
2. Supervises waste technicians
3. Reports to the supervisor
4. May participate in WIP approval
5. Provides instruction to waste technicians on the proper management of waste materials
6. May receive waste from off-site
7. May prepare waste for off-site shipment
8. May sample, analyze (Level I), handle, or transfer waste
9. May maintain equipment used for the sampling, analysis, handling, and transfer of waste
10. May conduct inspections pursuant to Section F of this permit
11. Implements Contingency Plan as needed

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. Overview of RCRA, TSCA, Vermont Hazardous Waste Management Regulations and USEB's Hazardous Waste Facility Certification
2. Overview of Hazardous Waste, Universal Waste and Used Oil Standards
3. Waste Analysis Plan
4. Contingency Plan
5. Outgoing Manifest Procedures
6. Incoming Manifest Review
7. Container Management and Storage Area Standards
8. Satellite Accumulation Standards
9. Preparedness and Prevention
10. Land Disposal Restrictions
11. Non-Hazardous Solid Waste

2.2.4 *Annual Review of Training*

1. Overview of USEB's Hazardous Waste Facility Certification
2. Waste Analysis Plan
3. Contingency Plan
4. Outgoing Manifest Procedures
5. Incoming Manifest Review
6. Container Management and Storage Area Standards
7. Satellite Accumulation Standards
8. Preparedness and Prevention
9. Land Disposal Restrictions
10. Non-Hazardous Solid Waste

2.3 Waste Technician

2.3.1 *Job Description (as related to waste management)*

1. Conducts duties in a safe and compliant manner
2. Reports to senior waste technician or supervisor
3. Performs duties as assigned by supervisor or senior waste technician
4. May be responsible for maintaining various required facility records
5. May sample, analyze (Level I), handle, or transfer hazardous waste
6. May prepare hazardous wastes for off-site shipment
7. May maintain equipment used for the sampling, analysis, handling, treatment, or transfer of waste
8. May conduct inspections in accordance with Section F of this permit
9. May review WIPs with Senior Waste Technician or Supervisor

2.3.2 *Requisite Skill, Education, or other Qualifications*

1. High school diploma or equivalent.

2.3.3 *Initial Training*

1. Overview of RCRA, TSCA, Vermont Hazardous Waste Management Regulations and USEB's Hazardous Waste Facility Certification
2. Overview of Hazardous Waste, Universal Waste and Used Oil Standards
3. Waste Analysis Plan
4. Contingency Plan
5. Outgoing Manifest Procedures
6. Incoming Manifest Review
7. Container Management and Storage Area Standards
8. Satellite Accumulation Standards
9. Preparedness and Prevention
10. Land Disposal Restrictions
11. Non-Hazardous Solid Waste

2.3.4 *Annual Review of Training*

1. Contingency Plan
2. Container Management and Storage Area Standards
3. Outgoing Manifest Completion
4. Incoming Manifest Review
5. Non-Hazardous Solid Waste

2.4 Customer Service Specialist/Hazardous Waste Manager

2.4.1 *Job Description (as related to waste management)*

1. Conducts duties in a safe and compliant manner
2. Reports to Facility Manager
3. Performs duties as assigned by Facility Manager
4. May be responsible for maintaining various required facility records
5. May prepare hazardous waste paperwork for off-site shipment
7. May review incoming WIPs and supporting documentation for waste stream approval and/or request additional information (i.e. SDS or analysis) or reject waste stream approval.
8. May review WIPs with Senior Waste Technician or Supervisor
9. May review incoming waste shipment documents for completeness, accuracy and receive waste in accordance with WAP.

2.4.2 *Requisite Skill, Education, or other Qualifications*

1. High school diploma or equivalent.

2.4.3 *Initial Training*

1. Overview of RCRA, TSCA, Vermont Hazardous Waste Management Regulations and USEB's Hazardous Waste Facility Certification
2. Overview of Hazardous Waste, Universal Waste and Used Oil Standards
3. Waste Analysis Plan
4. Contingency Plan
5. Outgoing Manifest Procedures
6. Incoming Manifest Review
7. Container Management and Storage Area Standards
8. Satellite Accumulation Standards
9. Preparedness and Prevention
10. Land Disposal Restrictions
11. Non-Hazardous Solid Waste

2.4.4 *Annual Review of Training*

1. Contingency Plan
2. Container Management and Storage Area Standards
3. Outgoing Manifest Completion
6. Incoming Manifest Review
7. Non-Hazardous Solid Waste

3.0 **TRAINING CONTENT, FREQUENCY, AND TECHNIQUES**

3.1 Training Content

Outlines for each of the initial and annual training topics (modules) are included in **Attachment A**.

3.2 Training Frequency

Initial training will be provided to each employee with waste management duties within six months of the employee's start date or transfer to a different job description. These employees will be supervised until such time that initial training has been completed.

Annual training on each topic will be completed within approximate 12-month intervals (plus or minus three months). Annual training on each topic will be conducted at least once per calendar year.

3.3 Training Techniques

USEB occupies a unique niche in the waste management industry and believes that its training needs may not be adequately addressed by standardized training offered by “outside” contracted instructors. Consequently, USEB typically provides “in-house” training for facility-specific topics and only utilizes outside instructors for comprehensive and “refresher” trainings (e.g., RCRA/TSCA overview, OSHA 40-hour HAZWOPER, 8-hour refresher). In-house training is better suited to the various levels of experience possessed by USEB employees, Vermont-specific regulatory requirements, and the specific waste management situations that may be encountered by USEB employees.

Training may be provided “face-to-face” by a qualified instructor (e.g., USEB Supervisor, Senior Waste Technician or an outside consultant that is familiar with USEB’s operations and hazardous waste facility certification) in a classroom setting, or using prepared media (e.g., video or workbooks). Proficiency examinations or quizzes may be used to evaluate training effectiveness.

4.0 TRAINING FOR EMERGENCY RESPONSE

All USEB employees whose job titles and descriptions are provided in paragraph 2.0 of this section receive training on USEB’s Contingency Plan (**Appendix G**), Preparedness and Prevention procedures (**Appendix F**), and the OSHA 1910.120 40-hour HAZWOPER and 8-hour refresher trainings. In the event of an emergency, these employees are thereby trained to ensure that they are able to respond effectively until such time that local emergency responders arrive at the facility. At a minimum, emergency response training will familiarize USEB personnel with emergency procedures, emergency equipment, and emergency systems (including procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment, key parameters for automatic waste feed cut-off systems, communication and alarm systems, response to fires or explosions, response to groundwater contamination incidents, and shutdown of operations, as applicable).

5.0 DOCUMENTATION OF EMPLOYEE TRAINING

All employee training will be documented (per 40 CFR 264.16(d) and (e)). **Attachment B** provides an example of documentation used to record each employee’s completed training.

APPENDIX H: ATTACHMENT A

TRAINING MODULES

WASTE ANALYSIS PLAN TRAINING MODULE

1. General overview
2. Waste Prequalification Procedures
 - Waste Information Profile (“WIP”) forms
 - Identification of Outbound Disposal Options
 - Lab Packs
3. Waste Receiving Procedures:
 - Level I Testing
 - Level II Testing
 - Level III Testing
4. Waste Acceptance Procedures
5. Outbound Waste Consolidation Procedures
6. Manifest Discrepancies
7. Proper Handling of Unknowns
8. Waste Sampling Procedures
9. Testing Methods
10. Proper Completion of forms/documents

OVERVIEW OF RCRA, TSCA, APPLICABLE VERMONT DEC REGULATIONS AND EVI HAZARDOUS WASTE FACILITY CERTIFICATION

TRAINING MODULE 1.

EPA RCRA regulations: 40 CFR 260-268

EPA TSCA regulations: 40 CFR 761

Vermont Hazardous Waste Management Regulations (Subchapters 1-9)

Overview of EVI's Hazardous Waste Facility Certification:

- SECTION A – PART A APPLICATION
- SECTION B – FACILITY DESCRIPTION
- SECTION C – WASTE ANALYSIS PLAN
- SECTION D – PROCESS INFORMATION
- SECTION E – GROUNDWATER MONITORING
- SECTION F – PROCEDURES TO PREVENT HAZARDS
- SECTION G – CONTINGENCY PLAN
- SECTION H – PERSONNEL TRAINING PLAN
- SECTION I – CLOSURE PLAN
- SECTION J – CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS
- SECTION K – OTHER FEDERAL LAWS
- SECTION L – PART B CERTIFICATIONS
- SECTION M – RESEARCH, DEVELOPMENT, AND DEMONSTRATION PERMITS
- SECTION N – 40 CFR 264, SUBPART AA AND BB
- SECTION O – 40 CFR 264, SUBPART CC
- SECTION P – DISCLOSURE STATEMENT

HAZARDOUS WASTE, UNIVERSAL WASTE AND USED OIL TRAINING MODULE

1. Hazardous Waste Exemptions
 - a. Subchapter 2; 7-203- Conditional Exemptions
 - b. Subchapter 2; 7-204- Recycling Exemptions

2. 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

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

4. Vermont Listed Hazardous Wastes (7-211)
 - a. VT01 - PCB's (equal to or greater than 50 ppm)
 - b. VT02 – Wastes containing greater than 5% Petroleum Distillates
 - c. VT03 - Water Miscible Metal Cutting and Grinding Fluid
 - d. VT06 - Pesticidal Wastes and Obsolete Pesticidal Products
 - e. VT08 - Waste Ethylene Glycol Solutions (greater than 700 ppm)
 - f. VT20 - Corrosive Solids
 - g. VT99 - Nonhazardous Wastes Shipped on a Hazardous Waste Manifest

5. Vermont Universal Wastes (Subchapter 9)
 - a. Batteries
 - b. Pesticides
 - c. Mercury Thermostats
 - d. PCB Lamp Ballasts
 - e. Lamps
 - f. Mercury-Containing Devices
 - g. Cathode Ray Tubes

6. Used Oil Management Standards (Subchapter 8)

CONTINGENCY PLAN TRAINING MODULE

1. Actions of facility personnel in response to hazardous waste emergencies
 - a. Spills/leaks/releases
 - b. Fires
 - c. Explosions
 - d. Response to groundwater contamination incidents
 - e. Key parameters for automatic waste feed cut-off systems
 - f. Shutdown of operations

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
 - d. Procedures for inspecting, repairing, and replacing emergency equipment

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

OUTGOING MANIFEST COMPLETION TRAINING MODULE

1. General Uniform Manifest Regulations
2. Steps to Manifest Completion

INCOMING MANIFEST REVIEW TRAINING MODULE

1. General Information
2. Procedure for review of incoming manifests
3. Procedures to make any changes:
 - a) Manifest discrepancies:
 - Significant discrepancy definition
 - Rejections
 - Container residues
 - Discrepancy resolution/reporting
 - b) Minor changes (i.e. change does not meet a “discrepancy” as defined by 7-704 (g))

CONTAINER MANAGEMENT AND STORAGE STANDARDS TRAINING MODULE

1. Containers must be in good condition.
2. Containers must be compatible with the waste.
3. Containers containing hazardous waste must be labeled or marked clearly with the words "Hazardous Waste." Containers containing Vermont-regulated waste must be labeled or marked clearly with the applicable Vermont code.
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 accumulation and storage areas and emergency equipment as required by permit.
13. Containers may be stacked two-high, but must be palletized and banded.

SATELLITE ACCUMULATION OF HAZARDOUS WASTE TRAINING MODULE

1. Satellite Accumulation Points

- a. Areas "at or near any point of generation where wastes initially accumulate, which is 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.

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 requirement 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; and
 - 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.

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 - permitted storage facilities or 90 days - 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 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. 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.
 - d. 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 (5) 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 of (applies to both off-site and on-site management).

**NON-HAZARDOUS SOLID WASTE
TRAINING MODULE**

1. Types and Definitions of Non-Hazardous Solid Wastes Managed at EVI
2. Special Requirements for Conditionally Exempt Wastes
3. Special Requirements for Household Hazardous Wastes

APPENDIX H: ATTACHMENT B

TRAINING DOCUMENT

Name: _____ Date: _____

(Print)

TRAINING SESSION/SEMINAR TITLE: _____

DESCRIPTION OF PROGRAM: _____

IN-HOUSE TRAINING PROGRAM [] OUTSIDE AGENCY PROGRAM []

SPONSORING AGENCY: _____

LENGTH OF SESSION: _____ (IN HOURS)

PRINCIPAL INSTRUCTOR(S): _____

YOUR PARTICIPATION: INSTRUCTOR [] PARTICIPANT []

I certify that I have trained in the above subject matter and have had the opportunity to ask questions, and that those questions have been answered to my satisfaction.

EMPLOYEE SIGNATURE: _____

INSTRUCTOR SIGNATURE: _____