

APPENDIX F
PERSONNEL TRAINING PLAN

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PERSONNEL TRAINING PLAN

The information provided in this section is submitted in accordance with the requirements of the Vermont Hazardous Waste Management Regulations (VHWMR) and 40 CFR §§ 264.16 and 40 CFR 270.14(b)(12).

F – 1.0 TRAINING PROGRAM OVERVIEW

The Barre Service Center (BSC) trains its employees in accordance with the requirements of the VHWMR and 40 CFR § 264.16, as specified in this plan. All employees receive introductory training and annual refresher training thereafter. In general, employees are instructed on the dangerous nature of hazardous wastes; the importance of maintaining compliance with the VHWMR and the hazardous waste facility permit; the proper handling and storage procedures for hazardous wastes; and emergency procedures and the contingency plan.

Introductory training is provided to each employee with hazardous waste management duties within six months of their employment start date or an existing employee's transfer to a job description with hazardous waste duties. Employees are not allowed to work independently without first completing the introductory training.

Annual refresher training is required of all BSC personnel once per calendar year and provides updates on environmental regulations, a review of the hazardous waste facility permit including the contingency plan, and a review of the VHWMR. In addition, BSC employees receive periodic compliance updates on Safety-Kleen Compliance Department memoranda topics, such as changes to environmental regulations and compliance directives. Employees also receive continuing health and safety and hazardous material transportation training.

Employee training is accomplished using a combination of classroom (in-person), on-line, and on-the-job methods. Required training for each employee is documented through the corporate online learning system and tracked on a continual basis. If an employee has not completed required training(s), the employee and the branch manager are notified of the deficiency, and the

deficiency is tracked to completion through the corporate online learning system. An outline of the introductory and annual training programs is provided in **Table F- 1** (below). Employee training requirements, by job title, are summarized in **Attachment F-1**.

TABLE F-1

INTRODUCTORY AND ANNUAL TRAINING FOR BSC EMPLOYEES

- I. Purpose of Training and a Review of the Training Plan Outline
- II. Environmental Regulations and Generator Responsibilities
 - a. Generator Status
 - b. Manifesting – How to Complete and Distribute a Manifest
 - c. EPA Identification Numbers
 - d. Land Disposal Restriction Notifications
 - e. Completion of Service Document
- III. Department of Transportation Regulations
 - a. Vehicle Permits
 - b. Vehicle Inspections and Records
- IV. Waste Analysis Plan
 - a. Types of Waste Accepted at the Facility
 - b. Analyzing/Inspecting Incoming Shipments
- V. Preparedness and Prevention
 - a. Performing and Recording a Facility Inspection
 - b. Proper Maintenance of Storage Facilities and Associated Equipment
 - c. Emergency Equipment – Availability, Use, Inspection, Repair, and Replacement
 - d. Parameters for Automatic Waste Feed Cut-off Systems
 - e. Communications/Alarm Systems
 - f. Shutdown of Operations
- VI. Contingency Plan
 - a. Spills, Releases, Fires, and Proper Response Actions
 1. On-Site Incidents/Accidents

2. Transportation Accidents

b. Reporting Requirements

1. Safety-Kleen Incident Reporting
2. State Emergency Response System
3. National Response Center
4. Emergency Information
5. Review of Safety Data Sheets

VII. Operating Log / Record keeping

VIII. Facility Hazardous Waste Permit Requirements

- a. Container and Tank Storage
- b. Overview of Closure and Financial Assurance

IX. Hazardous Waste Transportation Requirements

- a. Management of Containers in Transit (10-day Transfer Requirements)
- b. Manifest Completion

X. Changes in Regulations or Facility Operations

F – 2.0 ORGANIZATIONAL STRUCTURE, JOB DESCRIPTIONS & TRAINING RESPONSIBILITIES

F – 2.1 Branch Manager

The Branch Manager is responsible for ensuring that all BSC employees are trained and required personnel training records are maintained at the facility in accordance with this Plan.

F – 2.2 Environmental Compliance Manager

Safety-Kleen's Environmental Compliance Department assigns an Environmental Compliance Manager to each branch location. This Manager provides in-person permit and environmental compliance training for the branch and is typically not located at the facility.

F – 2.3 Health and Safety Manager

Safety-Kleen's Health and Safety Department assigns a Health and Safety Manager to each branch location. This Manager provides face-to-face health and safety training for the branch and is typically not located at the facility.

F – 3.0 RECORDKEEPING

Training received by BSC employees is documented in their Individual Employee Development Record (see **Attachment F-2** for sample Completed Training Report) [40 CFR § 264.16(d)(4)]. The training topic, employee's name(s), and date of the training session are identified for each training received. In addition, for each position at the BSC with hazardous waste management responsibilities, the job title, employee name, and a written job description is documented as part of the facility record.

Job descriptions include the requisite skill, education and any other required qualifications, and the duties of an employee assigned to that position. Job descriptions are updated as necessary to reflect current requirements and duties of each BSC position.

All training documentation for current employees (e.g., Employee Development Records, Acknowledgments of Training Received, copies of each employee's completed written tests on training subjects) is maintained either electronically or in paper form (e.g., tests, sign-in sheets from in-person trainings), as part of the facility record. Training records for former employees are kept for at least three years from the date the employee last worked at the facility. Personnel training records may be transferred with an employee if he or she transfers to another facility operated by Safety-Kleen or Clean Harbors.

ATTACHMENTS

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ATTACHMENT F-1

Employee Training Requirements Summary

**Attachment F-1
Employee Training Requirements Summary**

Revised: April 2021

Course Code	Training Frequency	Course Description	Job Title						
			Branch Manager SK	Material Handler Lead	Branch Administrator Sr	Sales and Service Rep Sr Hrly	Sales and Service Rep (Hourly)	Oil Sales and Service Rep	Vac Sales and Service Rep II
ET140	Annual	RCRA SK Site Specific Training	X	X	X	X	X	X	X
ET2002	Triennial	DOT Regulation Haz Mat Empl.	X	X	X	X	X	X	X
EX2020	Biennial	IATA Dangerous Goods- Biennial	X						
HS2100	One-Time	OSHA 24 Hour Hazwoper	X	X		X	X	X	X
HS4010	One-Time	Bonding & Grounding	X	X		X	X	X	X
HS6100	One-Time	Fall Protection	X	X		X	X	X	X
HS6301	Annual	1 of 12 Globally Harm Sys(GHS)	X	X	X	X	X	X	X
HS6302	Annual	2 of 12 Medical/Bloodborne	X	X	X	X	X	X	X
HS6303	Annual	3 of 12 Respiratory Protection	X	X	X	X	X	X	X
HS6304	Annual	4 of 12 Conf Space/Heat Stress	X	X	X	X	X	X	X
HS6305	Annual	5 of 12 PersProt Equip/Hearing	X	X	X	X	X	X	X
HS6306	Annual	6 of 12 Decontamination Proc	X	X	X	X	X	X	X
HS6307	Annual	7 of 12 Emergency Response	X	X	X	X	X	X	X
HS6308	Annual	8 of 12 Drum/Material Handling	X	X	X	X	X	X	X
HS6309	Annual	9 of 12 Incid Report&Injury Case	X	X	X	X	X	X	X
HS6310	Annual	10 of 12 Hazard Recognition	X	X	X	X	X	X	X
HS6311	Annual	11of 12 Back Safety/Ergonomics	X	X	X	X	X	X	X
HS6312	Annual	12of 12 Cold Stress&FireSafety	X	X	X	X	X	X	X
M42010	One-Time	Vacuum Services BOG – U.S.	X					X	X
SS1230	One-Time	Env Management Sys Awareness	X	X	X	X	X	X	X
ED3001 - ED3009	One-Time	Branch SOP Class 1 - 9 Admin			X				
HS0010	One-Time	H&S Admin Personnel			X				
O21001	One-Time	Customer Manifest Inform Chang			X				
O21002	One-Time	Req for Gen EPAID # & Manifest			X				
O21008	One-Time	Comp Dist Uniform Hazwaste Man			X				
O43002	One-Time	SK Spill Response Procedure			X				
SS2035	Annual	SPCC Training	X	X	X	X	X	X	X
HS6071	Annual	Quantitative Fit Test	X	X		X	X	X	X
SS2025	Annual	Contingency Plan Training	X	X	X	X	X	X	X

ATTACHMENT F-2

Individual Employee Development Record

Emplid #	Name	Job Title	Deptid	Supv ID	Supervisor Name	EE Type	EE Stat
Completed Courses							
Course	Description	Completed					
ET5020	Load Securement Awareness	08/12/2019					
ET1002	ISO / EMS Overview	08/08/2019					
ET140	RCRA SK Site Specific Tra	08/08/2019					
SS2035	SPCC Training	08/08/2019					
SS2035	SPCC Training	08/08/2019					
HS6071	Quantitative Fit Test	07/23/2019					
HS6302	2 of 8 Medical/Bloodborne	07/22/2019					
ED500	SPARK Training	07/19/2019					
SK0092	New HT Guard Tank Release	07/17/2019					
HS6071	Quantitative Fit Test	07/15/2019					
ET2004	Fed Motor/CH Policies and	07/12/2019					
ET2002	DOT Regulation Haz Mat Em	07/11/2019					
HS2100	OSHA 24 Hour Hazwoper	07/10/2019					
ET237	Drum Inspection & Closure	07/09/2019					
MT2030	Overview of Clean Harbors	07/09/2019					
SSWK17	StartSafe Week 17 LOB Spe	07/05/2019					
SSWK18	StartSafe Week 18 LOB Spe	07/05/2019					
ET4021	Transpor Security Aware O	07/03/2019					
MT1150	DHS Active Shooter Traini	07/03/2019					
SSWK12	Health and Wellness	07/03/2019					
SSWK16	StartSafe Week 16 LOB Spe	07/03/2019					
SSWK13	Safe Driving/Equip Operat	07/02/2019					
SSWK14	StartSafe Week 14 LOB Spe	07/02/2019					
SSWK15	StartSafe Week 15 LOB Spe	07/02/2019					
SSWK20	StartSafe Week 20 LOB Spe	07/02/2019					
SSWK11	Personal Hazards	07/01/2019					
SSWK19	StartSafe Week 19 LOB Spe	07/01/2019					
ET5040	Def Driv Zurich Commercia	06/25/2019					
SK19D5	Remember Charlie (Part 7)	06/24/2019					
SK20D1	Haz Recogn: Snow & Ic	06/24/2019					
SK20D2	Haz Recog: Return & Fill	06/24/2019					
SK20D4	Final Exam (Part 1)	06/24/2019					
SK20D5	Final Exam (Part 2)	06/24/2019					
SK19D1	Haz Recogn: Hoses & Sting	06/21/2019					
SK19D2	Haz Recog: Grate Remov/Re	06/21/2019					
SK19D4	Drum Spinner Tool	06/21/2019					
SK14D1	Haz Recog: 3 Points of Co	06/20/2019					
SK14D2	Haz Recog Slips/Trips/Fal	06/20/2019					
SK14D3	START Hazard Recognition	06/20/2019					
SK14D4	Safety Alert Eye Wash Sta	06/20/2019					
SK14D5	Remember Charlie (Part 2)	06/20/2019					
SK15D1	Load/Offload Vans & Trail	06/20/2019					
SK15D2	Load/Offload Oil & Vac Tr	06/20/2019					
SK15D4	Safety Alert: Pressure Wa	06/20/2019					
SK15D5	Remember Charlie (Part 3)	06/20/2019					
SK16D1	Haz Recog: Drum Handling	06/20/2019					
SK16D2	Haz Recog: SK Branches	06/20/2019					
SK16D4	Safety Alert Anticipate H	06/20/2019					
SK16D5	Remember Charlie (Part 4)	06/20/2019					
SK17D1	PW Safety Stand-down	06/20/2019					
SK17D2	Haz Recog: Customer Locat	06/20/2019					
SK17D5	Remember Charlie (Part 5)	06/20/2019					
SK18D1	Safety Standdown Accesing	06/20/2019					
SK18D2	Stay Hydrated	06/20/2019					
SK18D4	Safety Alert: Bungee Cord	06/20/2019					
SK18D5	Remember Charlie (Part 6)	06/20/2019					
W11D1	Attitude Makes All the Di	06/20/2019					
W11D2	Hazardous Attitudes & Rem	06/20/2019					
W11D3	Complacency	06/20/2019					
W11D4	Fatigue	06/20/2019					
W11D5	Rushing	06/20/2019					
W12D1	Stretching & Exercise	06/20/2019					
W12D2	Healthy Eating	06/20/2019					
W12D3	Stress Management	06/20/2019					
W12D4	Proper Rest	06/20/2019					

Emplid #	Name	Job Title	Deptid	Supv ID	Supervisor Name	EE Type	EE Stat
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Completed Courses							
Course	Description	Completed					
W13D1	Distracted Driving Review	06/20/2019					
W13D2	Zurich 10-4 Defense Revie	06/20/2019					
W13D3	Zurich Safe Driving Revie	06/20/2019					
W13D5	Remember Charlie (Part 1)	06/20/2019					
SSWK08	I Will Intervene in Unsaf	06/19/2019					
SSWK09	I will report all incin/m	06/19/2019					
SSWK10	5 Good Reasons Why be Saf	06/19/2019					
W10D1	Homecoming	06/19/2019					
W10D3	Safety Alert Spill Caught	06/19/2019					
W10D4	Who's There	06/19/2019					
W7D5	Shane's Safety Story	06/19/2019					
W8D2	The Obedience Experiment	06/19/2019					
W8D3	Safety Alert-Silo Engulfm	06/19/2019					
W8D4	The Incident	06/19/2019					
W8D5	Mike's Safety Story	06/19/2019					
W9D1	Report Incidents Near Mis	06/19/2019					
W9D3	Safety Alert Hazard Notif	06/19/2019					
W9D4	Kate's Safety Story	06/19/2019					
SSWK04	I Will Drive Responsibly	06/18/2019					
SSWK05	I Will Think Before Start	06/18/2019					
SSWK06	I Will Work Which I am Tr	06/18/2019					
SSWK07	I Take Resp My/Everyone S	06/18/2019					
W2D3	Death in the Oilfield	06/18/2019					
W2D4	Video: Executive Intervie	06/18/2019					
W2D5	Doug's Safety Story	06/18/2019					
W3D1	Is it Just me: Integrity	06/18/2019					
W3D2	Workplace Safety	06/18/2019					
W3D3	Safety Alert - Confined S	06/18/2019					
W3D5	Barry's Safety Story	06/18/2019					
W4D1	Distracted Driving	06/18/2019					
W4D2	Driving the Posted Speed	06/18/2019					
W4D4	Matt's Safety Story	06/18/2019					
W5D1	Think About It	06/18/2019					
W5D3	Safety Alert Rem Cap Pres	06/18/2019					
W5D4	Exec Safety Mesg: Dave Pa	06/18/2019					
W5D5	Tracy's Safety Story	06/18/2019					
W6D1	Training: Many Components	06/18/2019					
W6D3	Safety Alert - Drum Stack	06/18/2019					
W6D4	Young Forklift Op Broken	06/18/2019					
W6D5	Curtis' Safety Story	06/18/2019					
W7D1	My Responsibility	06/18/2019					
W7D2	Thank You	06/18/2019					
W7D3	Safety Alert Utility Kniv	06/18/2019					
SSWK01	Nothing Worth Get Injured	06/17/2019					
SSWK02	Near Miss Accident Preven	06/17/2019					
SSWK03	Safety Must be Actively M	06/17/2019					
TC1000	TC Awareness Load Securem	06/17/2019					
TC1005	TC Awareness Placarding	06/17/2019					
TC1010	TC Aware Shipping Paper A	06/17/2019					
TC1015	TC Awaren Container Inspe	06/17/2019					
TC1020	TC Awareness Container Cl	06/17/2019					
TC1025	TC Aware Container Mark&L	06/17/2019					
VID302	New Emp CEO Safety Messag	06/17/2019					
W1D2	Not Sure Ask	06/17/2019					
W1D4	Safety Alert - Mercury Sp	06/17/2019					
W1D5	Steve's Safety Story	06/17/2019					
W2D1	It Only Takes a Second	06/17/2019					
CS3160	Container Management Trai	06/14/2019					
ET5025	Vehicle Inspection Progra	06/14/2019					
HS1050	Fall Protection Awareness	06/14/2019					
SS1230	Env Management Sys Awaren	06/14/2019					
VID301	Live It 3-6-5 CH Kids Saf	06/14/2019					
CA1002	Ethics Policy Training	06/13/2019					
ED102	EE Handbook Code of Condu	06/13/2019					
ED13EM	Prev Workplace Harassment	06/13/2019					

Emplid #	Name	Job Title	Deptid	Supv ID	Supervisor Name	EE Type	EE Stat
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Completed Courses

Course	Description	Completed
ED3015	Branch SOP Class 15 Reps	06/13/2019
ED3016	Branch SOP Class 16 Reps	06/13/2019
ED3017	Branch SOP Class 17 Reps	06/13/2019
ED3018	Branch SOP Class 18 Reps	06/13/2019
ED3019	Branch SOP Class 19 Reps	06/13/2019
HS6307	7 of 8 Emergency Response	06/13/2019
HS6308	8 of 8 Drum/Material Hand	06/13/2019
MT2030	Overview of Clean Harbors	06/13/2019
ET1015	Newson Gale Operation	06/12/2019
HS6301	1 of 8 Globally Harm Sys	06/12/2019
HS6303	3 of 8 Respiratory Protec	06/12/2019
HS6304	4 of 8 Conf Space/Heat St	06/12/2019
HS6305	5 of 8 Pers Prot Equip/He	06/12/2019
HS6306	6 of 8 Decontamination Pr	06/12/2019
M41008	Do-It-Yourself (DIY) Proc	06/12/2019
O43002	SK Spill Response Procedu	06/12/2019
PT261	FluidKleen Filtration Uni	06/12/2019
PT267	Recycling PW Service with	06/12/2019
SS2035	SPCC Training	06/12/2019
ET2094	Placarding	06/11/2019
ET2120	A&D Testing Drivers Needt	06/11/2019
ET237	Drum Inspection & Closure	06/11/2019
ET5025	Vehicle Inspection Progra	06/11/2019
HS4010	Bonding & Grounding	06/11/2019
HS4055	Lockout/Tagout Affected	06/11/2019
MT3012	CustomerNOW	06/11/2019
O22008	Signing Regulatory Docume	06/11/2019
VID300	Safety 3-6-5 Alan McKim M	06/11/2019
CS204	Point of Service Checklis	06/10/2019
ED30HH	Handheld Usage SOP	06/10/2019
ET010	CSA 2010	06/10/2019
ET177A	PatriotAct-Emp-HazMat Sec	06/10/2019
EV0244	Fatigue Management Traini	06/10/2019
HS1051	Ergonomics	06/10/2019
HS4250	Hand Signals	06/10/2019
HS6010	Cold Stress	06/10/2019
HS6015	Heat Stress	06/10/2019
MT1165	Alcohol & Drug Free Wkpl	06/10/2019
MT2065	Search & Inspection Polic	06/10/2019
MT2075	Electronic Comm & Email P	06/10/2019
MT3201	Social Media Policy	06/10/2019
TE123	Kronos Time Entry System	06/10/2019
VID302	New Emp CEO Safety Messag	06/10/2019