

Appendix H

**Training Plan
And Job Descriptions**

Introduction

The University of Vermont (UVM) operates the Environmental Safety Facility (ESF), a hazardous waste treatment and storage facility at 667 Spear Street in Burlington, Vermont. UVM has prepared this plan in accordance with VHWMR 7-309.

Training Program Content, Frequency and Techniques

The training program in place for ESF personnel ensures that they know how to operate and maintain the ESF in a safe manner. The program consists of both introductory and continuing training and includes on the job as well as classroom training. New employees will complete their introductory training within six months of their first day of work at the ESF. Trained ESF staff will closely supervise new employees until they successfully complete their initial training. Introductory training includes instructions, descriptions and demonstrations of daily operations including, as appropriate:

- Emergency systems, alarms and communication systems;
- Emergency response procedures including response to fires and ground water contamination incidents, where applicable;
- Inspecting, repairing and replacing ESF emergency and monitoring equipment;
- Internal waste tracking instructions;
- Container management;
- Waste packing; and
- Waste stream verification.

ESF Chemical Handling and Emergency Response Staff receive a 40 hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training, which meets the requirements of 29 CFR 1910.120. Other ESF personnel receive, at a minimum, HAZWOPER Awareness Level Training which meets the requirements of 29 CFR 1910.120.

ESF personnel participate in annual training relevant to their position. This training is provided through qualified internal personnel or through contractors who specialize in various aspects of the hazardous waste management field. The program must be directed by a person trained in hazardous waste procedures.

Topics included in a typical annual training program are listed below. Similar timely and equivalent information is presented each year. Training is reviewed annually.

- Implementation of the Contingency Plan (Appendix G)
- Chemical Safety and Toxicology
- Personal Protective Equipment and Respiratory Protection
- Emergency Procedures
- RCRA and DOT Regulations
- Waste Minimization
- OSHA HAZWOPER (29 CFR 1910.120) refresher training

Job Description for ESF Chemical Handling and Emergency Response Staff

All ESF chemical handling and emergency response personnel have an appropriate level of training and experience or education to adequately perform the tasks described below:

Basic Function

To manage the UVM Hazardous Waste Management program in accordance with applicable state and federal regulations. Train the campus community in the relevant hazardous waste laws and regulations including proper disposal of waste materials and minimization techniques.

Characteristic Duties/Responsibilities

- Manage ESF, including inventory and daily inspections.
- Pickup, label, and transport waste chemicals in accordance with all applicable local, state, and federal regulations.
- Prepare waste for proper disposal.
- Respond to chemical spills and releases.
- Implement Contingency Plan (Appendix G)
- Maintain records related to program activities including hazardous waste manifests and other documents required as part of the ESF operating record.
- Serve as a liaison with agencies regulating hazardous waste.

Transportation

ESF personnel required to drive the hazardous waste transport vehicle as part of their job duties will attend a training course for hazardous materials/waste transporters. They are also required to maintain a Commercial Driver's License (CDL) with HAZMAT endorsement.

In addition, any employee who is required to drive a UVM vehicle must complete UVM's Driver Training and Certification program.

ESF Job Titles & Descriptions Relating to Hazardous Waste

Title: Environmental Compliance Manager, or equivalent
Job Description: Provide regulatory and technical oversight for hazardous waste operations and coordinate emergency response to chemical spills and releases. Ensure site security, proper building maintenance and conduct daily/weekly inspections as needed.

Title: Director of Environmental, Health, and Safety, or equivalent
Job Description: Coordinate emergency response to chemical spills and releases. Ensure site security, proper building maintenance and conduct daily/weekly inspections as needed.

Title: Environmental Safety Technician, or equivalent
Job Description: Collect, transport, package and consolidate hazardous waste. Additionally, arrange, schedule, and oversee end disposal shipments and coordinate emergency response to chemical spills and releases. Ensure site security, proper building maintenance and conduct daily/weekly inspections as needed.

Title: Safety Professional (Laboratory or Occupational Health/Safety) or similar
Job Description: Provide safety and environmental management system training and oversight to campus users of hazardous materials, and coordinate emergency response to chemical spills and releases. Ensure site security, proper building maintenance and conduct daily/weekly inspections as needed.

Recordkeeping

The following training information is kept as part of the ESF's operating record:

- Job titles and the names of the employees filling those positions;
- Written job descriptions;
- Descriptions of introductory and continuing training, and;
- Records that document the training received by personnel.

Training records on current personnel are kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility.