Appendix B-3

Personnel Training Program

PERSONNEL TRAINING PROGRAM

US ECOLOGY NEVADA

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SECTION 6
PERSONNEL TRAINING PROGRAM
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PERSONNEL TRAINING PROGRAM

6.1.0 Overview of RCRA Training Program

The RCRA training program provides facility personnel with the knowledge necessary to understand the processes and materials with which they are working. Training improves safety, reduces health hazards, prevents emergencies and prepares employee to respond to any situation. In addition, the program provides the knowledge for using, inspecting, repairing, and replacing facility emergency equipment.

Initial training of employees is completed within six (6) months of their start-work date. Each employee participates in an annual review of his or her initial training. Continuous instruction in safety is provided through safety meetings and drills. The goal is to have personnel trained to perform their specific job functions in a compliant manner and to maintain the facility in a state of preparedness.

6.1.1 RCRA Personnel Training Requirements

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the Permit and regulations. Facility personnel must successfully complete the program within six (6) months of the date of their employment or reassignment, whichever is later. The program is designed to ensure that facility personnel are able to respond effectively to emergencies. Employees must successfully complete a program of classroom instruction <u>or</u> on-the-job training, and must be trained to perform their duties in a way that ensures the facility's compliance with this requirement.

6.1.2 "Facility Personnel" Defined

The regulations regarding facility personnel training require that employees responsible for managing hazardous waste be trained to the degree necessary that they can manage hazardous waste in compliance with the facility's permit and referenced regulations. For the purpose of this training program, the term "facility personnel" applies to those employees who work on-site for the purpose of managing (e.g., waste sampling, storing, treating, disposing) hazardous waste. There are also personnel on-site whose job functions do not involve the "management of hazardous waste" but may affect facility compliance. These persons/job descriptions include secretaries, load controllers, data entry clerks, receptionists, accountants, customer relation specialists, equipment mechanics, etc. At a minimum, these personnel will receive training in those areas of their jobs which may affect compliance. Not covered by this training program are persons from other divisions of US Ecology, consulting engineers, etc., who do not manage hazardous waste as described above (e.g., geologists, environmental samplers, construction personnel, auditors). Personnel from off-site who are involved in the management of hazardous waste will either be trained in accordance with this plan or the contractor or the employee must certify to the facility that all employees have been properly trained. This certification will be kept on-site in lieu of training records.

6.1.3 Training Records

Training records are maintained for each facility employee meeting the definition of facility personnel. Each record includes the job title of the employee, a description detailing the requisite skill, education, other qualifications, and duties related to that job title, and the amount of both introductory and continuing training that will be given to that employee. Also included in the file are records that document the training has been completed or job experience is satisfactory.

When personnel miss a refresher course (e.g., due to illness, vacation), they may review that topic with their supervisor, the training coordinator, or other qualified individuals or review the film of the training session. Such reviews are documented in the individual personnel training files.

Training records on current personnel will be kept until closure of the facility. Training records on former employees will be kept for at least three (3) years from the date the employee last worked at the facility except that, personnel training records may accompany personnel transferred within the company.

6.1.4 Off-Site Training

Training is available apart from the facility which can serve to fulfill the training required herein. In some areas, technical training, field experience, college credits or degrees can serve to exempt a person from further training in certain areas. For example, the General Manager and Lab Manager will normally have degrees or experience in engineering, chemistry, or other science-related fields. These personnel would not be well served by having to attend a course in "Chemical Terminology, Toxicology, and Handling." In fact, these personnel may serve as the on-site technical expert in that area. In those cases where a person has expertise in an area, formal education or job experience may be documented and serve as total fulfillment of that particular training need.

In some years, a person may attend an off-site seminar or training course which contains equivalent information contained in one or more of the on-site training sessions. This training may be documented by the trainee (self-certification) and serve as total fulfillment of that particular training need.

Management training often takes place in non-discrete sessions such as corporate staff meetings, compliance meetings, permit application work groups, permit negotiations, or other informal sessions and even self-directed learning sessions. These sessions often are of better quality for managers and can be documented by the trainee (self-certification) and serve as total fulfillment of that particular training need.

In summary, non-US Ecology sponsored training may be completed and documented to fulfill the training requirements contained in this plan. The training, if it is to be used as fulfillment of the requirements contained herein, must be documented appropriately.

6.2.0 US Ecology Sponsored Training

The RCRA training program is centered around the adequate training of facility personnel. USEN's employees are to be trained with safety and environmental protection as the primary concern. Training can be obtained from many sources, and frequent off-site training is encouraged to allow the free exchange of new ideas. However, to ensure that a basic core-training program is available to our employees, USEN sponsors and administers a comprehensive RCRA Training Program. The following descriptions are typical of the basic concepts administered through the USEN RCRA Training Program. These concepts may be taught as an entire training module, as part of a single module, or as part of several modules.

6.2.1 Company Orientation

All personnel, upon initial employment, are introduced to the company philosophy and method of operation as well as specific rules and regulations.

6.2.2 Chemical Terminology, Toxicology, and Handling

This training provides a basic understanding of relevant terminology and inherent properties of the waste groups managed on-site. Precautions to be taken in handling hazardous wastes and the reasoning for such measures are emphasized. Specific consideration is given to the procedures and practices governing the mixing of materials and prohibiting mixing of incompatible materials which may result in undesired events. As an example, container management personnel will receive training emphasizing storage of ignitable, reactive, and incompatible materials.

Instructions are typically provided by the Laboratory Manager, Environmental Manager, Health and Safety Supervisor, Training Coordinator, or other technical representatives. Discussions of toxicology and inherent hazards are tailored to meet the types of materials treated, stored, or disposed of on-site.

6.2.3 Operating Practices Summary

All operators (e.g., landfill operators, stabilization operators, container management operators) will be required to be familiar with the operating practices for their respective units. Each operator will be instructed in the permit modules applicable to their unit, and discussions will be held to answer questions. Procedures and actions will be discussed, and actual drills may be performed in the field. Other personnel will be trained, as needed, through orientation or review of other relevant plans.

6.2.4 Contingency Plan

All personnel are required to understand the Contingency Plan to the degree that it affects them and be prepared to put it into action at all times. The Contingency Plan covers response to spills, fires, releases, and other emergency situations. The plan also discusses notification, evacuation, and clean-up procedures. This area of training includes instruction in the procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; the key parameters for automatic waste feed cut-off systems; emergency communications and alarm systems and signals; response to ground-water contamination incidents; and procedures to be followed in the event of a shutdown of operations, as applicable.

Procedures and actions are discussed and actual drills may be performed in the field. These periodic drills are held to simulate fires, explosions, or releases of hazardous wastes. Reviews are conducted at least annually and when changes in facility operation or personnel affect the coordinated effort needed for an emergency response.

6.2.5 Respiratory Equipment

For protection in atmospheres known or suspected to contain hazardous substances, designated personnel are instructed in the care and use of respiratory protection equipment. The training instructor is either a factory representative or an individual qualified due to their job skill (e.g., Health and Safety Supervisor, Training Coordinator, Fire Fighter, Paramedic). Training stresses proper use and fit and procedures for inspection and maintenance. The types of respiratory protection necessary are unique to each activity, depending on the inherent hazards of the materials handled, and the environment/area in which the material is located. For this reason, respiratory protection procedures are reviewed periodically and assessed for additional risk of respiratory insult because of changes in an operation.

Literature available for the respiratory protection equipment is read by and/or reviewed with employees. All repairs and inspections of equipment are performed by trained personnel when and where required. Reviews are held at least annually.

6.2.6 Unit and Equipment Operations

All personnel involved in the operation of hazardous waste management units or process equipment are required to be cognizant of proper operating procedures, emergency procedures, and maintenance particular to the unit or machinery he or she operates. Initial training covers operation of new or unfamiliar units, processes, or pieces of equipment. However, experienced personnel are also required to review the training topics (e.g., Safety Meetings).

6.3.0 Implementation of Training Program

Upon employment, assignment to the facility, or assignment to a new job at the facility, a training file is created or reviewed for the employee. The training record includes a job description, a summary of all training, and a summary of required training. Training may begin before the employee works in a hazardous waste management unit but must be completed within six (6) months of their start-work date. Employees do not work in an unsupervised position until the required training is completed. Each employee will participate in a review of his or her initial training at least annually (once per calendar year). Also included in the training file are records that document that the required training has been completed.