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H. PERSONNEL TRAINING RECORDS

H.1 Purpose

This personnel training section has been developed using the Code of Federal Regulations (CFR), 40 CFR 264.16 (Personnel Training), for requirements. Federal hazardous waste regulations require that owners or operators of hazardous waste management facilities to prepare an outline of introductory and continuing training programs "to prepare persons to operate or maintain the facility in a safe manner." CS Clean Solutions, Inc. (CS Clean) is subject to these Federal hazardous waste regulations and measures are taken to ensure proper employee training and record retention. These measures include a combination of the following:

- Facility personnel completing on-the-job training, which teaches employees to perform their duties in a way that ensures the facility's compliance with federal and state hazardous waste regulations.
- This training is directed by a person trained in hazardous waste management procedures and shall include instructions for facility-specific hazardous waste management procedures (including contingency and/or emergency plan implementation) relevant to the positions in which they are employed.
- The training should be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with procedures, equipment, and systems, including:
 - Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment,
 - Communications or alarm systems,
 - Response to fires or explosions,
 - Response to material releases, and
 - Properties and hazardous nature of all wastes at the facility.
- The training should be tailored to relevant tasks applicable to CS Clean. This may include training in the following actual tasks at the facility:
 - Use of personnel protective equipment,
 - Safety measures,
 - Manifest tracking, preparation,
 - Waste sampling procedures and handling,
 - Facility operation and maintenance,
 - Contingency measures,
 - Facility inspection,
 - Regulatory requirements,

- Facility recordkeeping,
 - Maintaining site security,
 - Prevention of fire, spill, and explosion, and
 - Familiarization of employees with the types of wastes handled at the facility and the hazards inherent in the handling of these wastes.
- CS Clean personnel must successfully complete the training program within six months of their assignments to the facility and must take part in an annual review of the program.
 - Facility personnel engaged in hazardous waste activities will not work in unsupervised positions until their training is complete.
 - The owner or operator must maintain documentation applicable to the training program.

H.2 Training Programs

A training program which would provide the same level of instruction to all onsite personnel is neither feasible nor desirable. Training will instead be consistent with job descriptions; each employee's position and specific duties will dictate the level of personnel training they receive.

Table H.1 summarizes the types of training, by job title, provided to CS Clean employees who take part in hazardous waste management. All training programs are currently being conducted by professionally trained third parties (i.e., consultants).

Table H.1 Training Requirements			
JOB TITLE	RCRA HW REGULATIONS	OSHA 29 CFR 1910.138	DOT 49 CFR 4-HOUR HAZMAT
Hazardous Waste Manager	X	X	X
Vice President	X	X	X
Hazardous Waste Handler	X	X	X
DOT = Department of Transportation		HW = Hazardous Waste	
OSHA = Occupational Safety and Health Administration		RCRA = Resource Conservation and Recovery Act	

H.2.1 OSHA 1910.38(e): Emergency Action Training, Initial (2-Hour) and Annual Refresher (1-Hour)

To meet the training requirements defined under 29 CFR 1910.38(e) for hazardous waste managers and handlers, the topics listed below are covered under this Emergency Action training program in **Table H.2**.

Table H.2 CS Clean Emergency Action Plan Training Outline	
Initial Notifications	<ul style="list-style-type: none"> • Emergency Coordinator priority order • Providing detailed information regarding emergency
Evacuation Procedure	<ul style="list-style-type: none"> • Recognizing alarms and signals • Safely ceasing work activities and shutting down equipment • Exit routes, alternates, rally points, re-entry • Practice drills
Locations of Exits and Equipment	<ul style="list-style-type: none"> • Nearest exits and alternate routes • Fire extinguishers and communication devices • Chemical storage areas
Best Management Practices	<ul style="list-style-type: none"> • Handling hazardous chemicals • Maintaining site security • Good housekeeping
Fire and Explosion	<ul style="list-style-type: none"> • Fire hazards in facility • Incipient stage firefighting
Spill/Release	<ul style="list-style-type: none"> • Hazardous chemical locations & storage quantities • Incidental spill cleanup
Natural Disasters and Civil Disturbances	<ul style="list-style-type: none"> • Safely gathering information • Personal safety
Medical Response	<ul style="list-style-type: none"> • Location of first aid kits and basic procedures • Emergency vs. non-emergency situations
Preparedness and Prevention	<ul style="list-style-type: none"> • Emergency response equipment and safe use • Signs and postings • Fire protection system • Good housekeeping and routine inspection

A hazardous waste manager is defined as an individual who responds to incidental releases or potential incidental releases for the purpose of stopping the release. The capabilities of the hazardous waste manager and emergency coordinator are provided below.

Hazardous Waste Manager

- Know how to implement CS Clean emergency action plan
- Know the classification, identification, and verification of known or unknown materials by using field survey instruments and equipment
- Be able to function within an assigned role in the Incident Command or Emergency Coordinator System
- Know how to select and use proper personal protective equipment (PPE) provided to the hazardous materials technician
- Understand hazard and risk assessment techniques
- Be able to perform advanced control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available with the unit

- Understand and implement decontamination procedures
- Understand termination procedures
- Understand basic chemical and toxicological terminology and behavior

Emergency Coordinator (Incident Commander)

- Know and be able to implement CS Clean incident command system
- Know how to implement CS Clean emergency action plan
- Know and understand the hazards and risks associated with employees working in chemical protective clothing
- Know how to implement the local emergency action plan
- Know and understand the importance of decontamination procedures

This training program is currently being conducted by HRP Associates, Inc. (HRP) Environmental Health and Safety consultants based in Farmington, Connecticut.

H.2.2 RCRA Hazardous Waste Regulations Training, Initial (4-Hour) and Annual Refresher (2-Hour)

Under this training program, employees are required to attend seminars/training programs that cover two or more of the following topics:

Topic	Objective
Hazardous Waste identification	Review "solid waste" definition including exemptions, criteria for identifying the characteristics of hazardous waste and for listed hazardous waste, characteristic of hazardous wastes and SW-846 sampling procedures and test methods.
Requirement for generators of hazardous waste	Review state and federal regulations for generators of hazardous waste including but not limited to the following: <ul style="list-style-type: none"> • Inspection • Training • Contingency • Container Management • Spill and release reporting • Manifests • Recordkeeping • Land Disposal • Recycling • Tank Systems
Permit Requirements for treatment, storage, and disposal facilities (TSDF)	Review state and federal regulations for TSDF facilities including, but not limited to, the following: <ul style="list-style-type: none"> • Scope • Inspection • Training • Waste Analysis • Contingency • Closure • Corrective Action • Recycling/Treatment of Hazardous Waste • Roles and Responsibilities • Container Management • Tank Systems • Manifests • Recordkeeping • Land Disposal • Spill and Release Reporting

Provided as **Appendix H.1** is an example completed training certificate, training will be provided for the hazardous waste manager, vice president, and hazardous waste handler prior to startup of RCRA hazardous waste activities onsite. This training program is performed by HRP of Farmington, Connecticut.

Provided below are summaries of the topics covered under the HRP hazardous waste training program.

Regulatory Overview (RCRA)

- Key Definitions
- What Wastes are Hazardous
- Solid Wastes
- Hazardous Wastes
- Listed Hazardous Wastes
- Characteristic Hazardous Waste
- Mixture Rule
- Derived From Rule
- Contained in Rule
- Generator Requirements
- Minimum Status Requirements
- Regulatory Requirements for Generators
- Hazardous Waste Determinations
- Obtain and EPA Identification Number
- Container Labeling
- Container Management – Satellite Storage
- Container Management – Container Storage Area
- Off-site Transportation of Containers
- Use a Manifest for all Off-site Shipments of Hazardous Waste
- Tank Systems – Generator Requirements
- Inspection Requirements – Excluding Tank Systems
- Preparedness and Prevention Requirements
- Contingency Requirements
- Hazardous Waste Training
- Reporting Requirements

- Recordkeeping Requirements
- Waste Minimization
- Closure Requirements
- Land Disposal Restrictions
- Treatment of Hazardous Waste
- Standards for the Management of Specific Hazardous Wastes (40 CFR Part 266 and 279)
- Recyclable Materials Used in a Manner Constituting Disposal (40 CFR 266 Subpart C)
- Standards for the Management of Used Oil (40 CFR 279)
- Universal Waste Rule, Small Quantity Handler of Universal Waste (SQHUW) Requirements and Large Quantity Handler of Universal Waste (LQHUW) Requirements
- Organic Air Emission Standards – Subpart CC
- Release Prevention and Response
- Spill/Release Notification Requirements
- Emergency Response Procedure
- Waste Minimization
- Enforcement
- Inspections
- Civil and Criminal Penalties

H.2.3 DOT 49 CFR Training, Initial (4-Hour) and Refresher every Three Years (2-Hour)

To meet the DOT training requirements defined under HM-126F, the following topics are reviewed as part of the training program:

Topic	Objective
General Awareness/ Familiarization Training	Review the hazardous material table and the symbols listed under each column of the table; review available shipping papers and information that must be provided; review the performance orientation package requirements; review marking and labeling requirements; review placard requirements and review proper loading and unloading requirements.
Function Specific Training	Review the function specific training for specific hazmat job duties.
Safety Training	Review the procedures for identifying known hazardous in the workplace; review the procedure for selection of personnel protective measures; and review responses to hazardous material emergencies.

Topic	Objective
Driver Training	Review pre-trip inspection procedures; review vehicle controls, equipment, and emergency equipment; review vehicle operations such as turning, backing up, braking, parking, handling curves, etc.; review requirements associated with tunnels, bridges, and railroad crossings; review loading/unloading procedures; and review guidelines for drivers such as no smoking within twenty-five feet of a vehicle carrying explosives, oxidizers, or flammables, incident reporting requirements, etc.

Provided as **Appendix H.1** is an example completed training certificate, training will be provided for the hazardous waste manager, vice president, and hazardous waste handler prior to startup of RCRA hazardous waste activities onsite. This training program is performed by HRP of Farmington, Connecticut.

This training program is conducted by HRP of Farmington, Connecticut.

H.3 Job Title Descriptions

Job descriptions for each job title listed under **Table H.1** are provided under **Sections H.3.1** through **H.3.3**. Included in the job descriptions are the CS Clean personnel’s duties, training requirements and requisite skill, education, and other qualifications.

At CS Clean, personnel duties can be changed a number of times during their tenure. Therefore, any list of personnel filing the job titles listed under **Table H.1** and included in this permit application would be out of date in a matter of a short period of time. Consequently, in order to comply with this requirement, CS Clean maintains a computer listing of the latest training programs provided to all onsite personnel. This program is used to determine/verify that all personnel have received their required training. The CS Clean Vice President reviews this computer listing at least monthly and personnel are notified either verbally or in writing of their training deadline and the next available training seminar. Before being notified, the Operations Manager assesses the type of training to be given to each individual.

H.3.1 Hazardous Waste Manager

Duties

- Supervision of all personnel managing hazardous waste at the facility
- Management of the hazardous waste storage areas including recordkeeping (i.e., training logs, inspection logs, operating records, and manifest)
- Establishment and maintenance of a regular waste pick-up services for CS Clean
- Ensures that wastes are prepared for offsite shipment to the disposal facility in accordance with all applicable environmental and DOT transportation regulations including consolidation, solidification, repackaging and labeling
- Establishment and maintenance of operating waste receipt logbook, waste profile sheet and Safety Data Sheet (SDS) filing systems

- Conducts hazardous waste treatment

Training

- **OSHA 29 CFR 1910.138(e)** – two hours initial training and one hour of refresher training annually
- **RCRA Hazardous Waste Regulations Course** – four hours initial training and two hours of refresher training annually, includes review of permit.
- **DOT 49 CFR** – four hours initial training and two hours of refresher training every three years

Note: listed training courses may change because of CS Clean policy or new regulation.

Requisite Skill/Education/Other Qualifications

- High school diploma
- One year training in related field

H.3.2 Hazardous Waste Handler

Duties

- Responsible for pick-up of waste from the processing area, treatment, and transfer of waste drums to the waste storage room
- Pick-up includes assurance that labeling meets requirements and container is in good condition
- Delivers waste to the waste storage room and stores in proper locations awaiting transfer by a vendor to the ultimate disposal site
- Conducts hazardous waste treatment
- Be aware of requirements governing proper packaging, spill response, and safety when working with hazardous waste
- Perform inspections of satellite and accumulation areas

Training

- **RCRA Hazardous Waste Regulations Course** – four hours initial training and two hours of refresher training annually, includes review of permit.
- **OSHA 29 CFR 1910.138(e)** – two hours initial training and one hour of refresher training annually
- **Hazardous Waste Coordinator Course** – forty hours initial Hazardous Waste Operations and Emergency Response (HAZWOPER) training – eight hours refresher training annually

- **DOT 49 CFR** – four hours initial training and two hours of refresher training every three years

Note: listed training courses may change as a result of CS Clean policy or new regulation.

Requisite Skill/Education/Other Qualifications

- OSHA Hazard Communications and Emergency Action Training

H.3.3 Vice President

Duties

- Ensure that CS Clean hazardous waste management receives appropriate management attention and ensures that the policies rules and regulations are implemented
- Maintains routine liaison with Arizona Department of Environmental Quality in regard to hazardous waste inspections, rule interpretation, and problem resolution
- Coordinate all site environmental programs, including air pollution prevention, industrial wastewater, and hazardous waste minimization
- Provide manpower positions/task assignments for hazardous waste related responsibilities
- Procure necessary hazardous waste equipment
- Coordinate with CS Clean employees in the development for procedures and equipment for fire and spill protection at hazardous waste storage sites in accordance with the emergency action and spill contingency plan
- Coordinate the training of all hazardous waste management personnel
- Develop programs to minimize Hazardous Waste generation

Training

- **OSHA 29 CFR 1910.138(e)** – two hours initial training and one hour of refresher training annually
- **RCRA Hazardous Waste Regulations Course** – four hours initial training and two hour of refresher training annually
- **DOT 49 CFR** – four hours initial training and four hours of refresher training every three years

Note: listed training courses may change as a result of CS Clean policy or new regulation.

Requisite Skill/Education/Other Qualifications

- Four-year college degree
- One year training in related field

H.3.4 Skilled Support Personnel

Per 29 CFR 1910.120(q)(4), these personnel may be skilled in the operation of certain equipment, who may be needed temporarily to perform immediate emergency support work and who will or may be exposed to hazards at an emergency response scene. CS Clean classifies skilled support personnel as those workers who may be called to the emergency response scene under circumstances where their expertise or specialization is required. CS Clean will utilize outside emergency response contractors in the event of a HAZWOPER scenario per Section G.

As required by OSHA, these personnel shall be given an initial briefing at the site prior to their participation in any emergency response. The initial briefing shall include instruction in the wearing of appropriate PPE, what chemical hazards are involved, and what duties are to be performed. The emergency coordinator is responsible for assuring that the initial briefing is provided to all skilled support personnel prior to their participation at the emergency response scene.

CS Clean will also utilize HRP, an environmental, health, safety and compliance firm of Farmington, Connecticut as qualified trainer to provide the above emergency action, RCRA hazardous waste, and DOT hazardous materials trainings.

H.4 Training Records

All training records provided to CS Clean personnel are maintained at the CS Clean business office. Training records on current personnel will be kept until closure of the facility. Training records on former personnel are kept for at least five years from the date they leave or are reassigned to a duty which does not involve hazardous waste management.

An example of the training certificates provided to CS Clean personnel that attend the Hazardous Waste Courses are provided as **Appendix H.1**.

APPENDIX H.1

Completed Training Certificate Examples



197 Scott Swamp Road
Farmington, CT

Certification of Achievement

Awarded to

Name

Company

For Successful Completion of

***Department of Transportation (DOT)
Hazardous Materials Training and Testing***

In accordance with 49 CFR 172.704

Month XX, Year

Awarded On

Expires after three (3) years

Instructor



197 Scott Swamp Road
Farmington, CT

Certification of Achievement

Awarded to

Name

Company

For Successful Completion of

OSHA Emergency Action Plan Training

In accordance with 29 CFR 1910.38

Month XX, Year

Awarded On

Expires after one (1) year

Instructor



197 Scott Swamp Road
Farmington, CT

Certification of Achievement

Awarded to

Name

Company

For Successful Completion of

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Management Training

**For LQG - In accordance with 40 CFR 265.16 and 40 CFR 262.34(a)(4) and state
equivalent**

For TSDF - In accordance with 40 CFR 264.16 and state equivalent

Month XX, Year

Awarded On

Expires after one (1) year

Instructor