ATTACHMENT H

AA SYDCOL, LLC

PERSONAL TRAINING

[40 CFR 270.14(b)(4) and (5))]

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Appendix A: Training Review Report

1.0 INTRODUCTION

All personnel working at the AA Sydcol, LLC (Facility) will receive training pertinent to their job functions and responsibilities. Personnel training will generally be provided by AA Sydcol employees, contracted persons, or contracted entities that are qualified in the safety aspects of handling hazardous wastes. The sections below provide an outline of the personnel training program implemented by AA Sydcol with an emphasis on how the program applies to individual job positions at the Facility.

2.0 OUTLINE OF INTRODUCTORY AND CONTINUING TRAINING PROGRAMS

Two types of personnel training will be provided to Facility personnel; initial training and refresher training. Personnel training will be integrated with human resource functions such that training is oriented toward the duties and responsibilities for each job position at the Facility. To achieve this, training will be packaged into modules.

Training will include classroom instruction and hands-on training of specific processing tasks at the Facility. All training will be provided by qualified instructors or persons experienced in performing the specific processing task at the Facility or at a similar facility. Some classroom instruction may be provided by contracted entities electronically via the internet for coursework related to certification or certification renewal provided the coursework is recognized by certifying entities.

2.1 Job Title/Job Description

AA Sydcol human resource program includes job descriptions for the various job titles/positions that are required for efficient waste processing operations at the Facility. Job positions at the Facility may include the following:

- Facility Manager. Manages Facility operations.
- Compliance Manager. Responsible for ensuring environmental regulatory compliance.
- Health and Safety Manager. Responsible for workplace safety, including safety and health regulations governing Facility operations.
- Training Manager. Responsible for all worker training at the Facility.
- Yard Manager. Responsible for managing and maintaining equipment and materials in the solid and hazardous waste management units.
- Emergency Coordinator. Responsible for implementing the Contingency Plan during emergency situations.

- Yard Supervisor. Supervises activities occurring in each of the waste management units.
- Chemist/Laboratory Technician. Responsible for all on-site laboratory and compliance testing.
- Hazardous Waste Technician I. Inexperienced technician handling hazardous waste containers at the Facility.
- Hazardous Waste Technical II. Experienced technician handling hazardous waste containers at the Facility.
- Driver. Driver of hazardous waste transportation vehicles.
- Administrative Assistant/Clerical Assistant. Provides administrative and office support services.

Multiple job roles may be performed by individual employees. All personnel information including employee names, job positions, job descriptions, and training records are maintained at the Facility. These files are maintained by the Training Manager and are accessible to all Manager Positions. Training records on current personnel are kept until closure of the Facility; training records on former employees are kept for at least three years from the date the employee last worked at the Facility.

2.2 Description of How Training will be Designed to Meet Actual Job Tasks

Personnel training will include classroom instruction and hands-on on-the-job training at the Facility. Classroom instruction will provide employees with understanding of overriding requirements for the work performed at the Facility, such as company policies, hazardous waste definitions, and OSHA Hazard Communications Standards. Other classroom instruction and on-the-job training will focus on specific processing tasks that are performed at the Facility, such as forklift safety, container handling, and materials consolidation and bulking.

Training will be directed by the Facility Manager and the Training Manager. On-the-job training will be provided by Facility employees that are experienced in performing the specific processing task to be mastered by the student employee. Hands-on training may also be provided by qualified instructors that are contracted to provide the training or by vendor/supplier training personnel for equipment used at the Facility.

Classroom instruction will be provided by instructors that are qualified to teach specific training module subjects. For example, company organization and policy may be provided by AA Sydcol corporate officers. Other classroom instruction may be provided by outside companies that specialize in hazardous waste handling and processing training. For specific processes that are

unique to AA Sydcol, training will be provided by Facility personnel that are experienced and qualified to give instruction.

The Facility Manager and the Training Manager will meet annually to review the training program. This review will include identifying any changes in processing methods used at the Facility, safety incidents that may have occurred during the previous year, and changes in regulations that may apply to the Facility. The training program will be modified to incorporate any required changes that are identified in this annual review. Should there be changes in processing methods or regulations that require immediate modification of training, the training modules will be revised to incorporate such changes at the earliest possible time. The Facility Manager will document the training review in a Training Review Report and maintain records of the review on-site in the Facility's operating record. A copy of the Training Review Report form is provided in Appendix A.

2.3 Training Manager

The Training Manager is responsible for all training conducted at the Facility, including selecting in-house trainers and instructors and contracted training entities. The Training Manager is also responsible for monitoring the type, frequency, and quality of personnel training and evaluating any problems at the Facility that may be minimized or eliminated by modifying the training program.

Qualifications for the Training Manager include a high school degree and possession of a 4-year college degree or at least 5 years of experience in the waste processing field, and a professional certification (such as an Associate Safety Professional (ASP), Certified Safety Manager (CSM), Certified Environmental, Safety & Health Trainer (CET) or an equivalent certification).

2.4 Relevance of Training to Job Description:

Two types of personnel training will be provided to Facility personnel; initial training and refresher training. Training will be designed so personnel are knowledgeable of the tasks they are responsible for at the Facility.

2.5 Initial Training

Initial training will include a program of classroom instruction and on-the-job training provided during the first six months of employment or assignment to a new position at the Facility. Personnel cannot work in an unsupervised capacity until the initial training has been completed. Initial training includes the following:

2.5.1 Managers (Facility Manager, Compliance Manager, Health and Safety Manager, Training Manager, Yard Manager)

- AA Sydcol organization and company policies;
- Hazard Communication;
- Facility Security - Alarm and Communications;
- Facility fire suppression system;
- Facility Contingency Plan;
- OSHA Hazardous Waste Operations, 40-hour Training with annual refresher;
- RCRA Organic Air Emissions Standards;
- Universal waste management;
- Land Disposal Restrictions;
- DOT Classifications System;
- Waste Analysis and Classification;
- General Health and Safety;
- Personal Protection Equipment (PPE);
- Waste Manifests – Incoming Review and Outgoing Completion;
- Container Storage, Transport, and Management;
- Forklift Safety;
- Materials Consolidation and Bulking Techniques and Methods;
- Land Disposal Restrictions;
- Preparedness and Prevention; and
- Emergency Response.

2.5.2 Supervisors (Emergency Coordinator, Yard Supervisor)

- AA Sydcol organization and company policies;
- Hazard Communication;
- Facility Security - Alarm and Communications;
- Facility fire suppression system;
- Facility Contingency Plan;
- OSHA Hazardous Waste Operations;
- RCRA Organic Air Emissions Standards;
- Equipment monitoring for leaks and equipment repair;
- Universal waste management;
- Waste Analysis and Classification;

- General Health and Safety;
- Personal Protection Equipment (PPE);
- Waste Manifests – Incoming Review and Outgoing Completion;
- Container Storage, Transport, and Management;
- Forklift Safety;
- Materials Consolidation and Bulking Techniques and Methods;
- Land Disposal Restrictions;
- Preparedness and Prevention; and
- Emergency Response.

2.5.3 Technicians (Chemist/Laboratory Technician, Hazardous Waste Technician I, Hazardous Waste Technican II, Drivers)

- AA Sydcol organization and company policies;
- Hazard Communication;
- Facility Security - Alarm and Communications;
- Facility fire suppression system;
- Facility Contingency Plan;
- OSHA Hazardous Waste Operations, 40-hour Training;
- RCRA Organic Air Emissions Standards;
- Equipment monitoring for leaks and equipment repair;
- Universal waste management;
- General Health and Safety;
- Personal Protection Equipment (PPE);
- Container Storage, Transport, and Management;
- Forklift Safety; and
- Materials Consolidation and Bulking Techniques and Methods.

2.5.4 Office and Administrative Personnel (Administrative Assistant, Clerical Assistant)

- AA Sydcol organization and company policies;
- Hazard Communication;
- Facility Security - Alarm and Communications; and
- Facility Contingency Plan.

2.6 Refresher Training

Refresher Training provides for annual instruction at least once each year. Annual Refresher Training usually takes up to eight hours, and includes similar topics but is not as comprehensive as the Initial Training. Refresher training includes the following:

2.6.1 Managers (Facility Manager, Compliance Manager, Health and Safety Manager, Training Manager, Yard Manager):

- Hazard Communication;
- Facility Security - Alarm and Communications;
- Facility Contingency Plan;
- OSHA Hazardous Waste Operations, 8-hour refresher
- Land Disposal Restrictions;
- DOT Classifications System;
- Waste Analysis and Classification;
- General Health and Safety;
- Universal waste management;
- Personal Protection Equipment (PPE);
- Waste Manifests – Incoming Review and Outgoing Completion;
- Container Storage, Transport, and Management;
- Forklift Safety;
- Materials Consolidation and Bulking Techniques and Methods;
- Land Disposal Restrictions;
- Preparedness and Prevention; and
- Emergency Response

2.6.2 Supervisors (Emergency Coordinator, Yard Supervisor):

- Hazard Communication;
- Facility Security - Alarm and Communications;
- Facility Contingency Plan;
- OSHA Hazardous Waste Operations, 8-hour refresher;
- Equipment monitoring for leaks and equipment repair (triannual);
- Waste Analysis and Classification;
- Universal waste management;
- General Health and Safety;
- Personal Protection Equipment (PPE);
- Waste Manifests – Incoming Review and Outgoing Completion;

- Container Storage, Transport, and Management;
- Forklift Safety;
- Materials Consolidation and Bulking Techniques and Methods;
- Land Disposal Restrictions;
- Preparedness and Prevention; and
- Emergency Response.

2.6.3 Technicians (Chemist/Laboratory Technician, Hazardous Waste Technician I, Hazardous Waste Technical II, Drivers):

- Hazard Communication;
- Facility Security - Alarm and Communications;
- Facility Contingency Plan;
- OSHA Hazardous Waste Operations, 8-hour refresher;
- Equipment monitoring for leaks and equipment repair; (triannual)
- Universal waste management;
- General Health and Safety;
- Personal Protection Equipment (PPE);
- Container Storage, Transport, and Management;
- Forklift Safety; and
- Materials Consolidation and Bulking Techniques and Methods.

2.6.4 Office and Administrative Personnel (Administrative Assistant, Clerical Assistant):

- Hazard Communication;
- Facility security - Alarm and Communications; and
- Facility Contingency Plan.

2.7 Training for Emergency Response

All Facility personnel are trained to be familiar with the initial responses to an emergency. This training is provided in the Facility Contingency Plan module and includes the following:

- Location and use of telephones, radios, intercoms and the security alarm systems.
- Initial response to fire or explosion to prevent loss of life;
- Identity of emergency response agencies and contracted entities that are to be notified if the Facility is to be evacuated; and
- Facility evacuation procedures.

Managers, Supervisors, and Technicians are also trained as necessary in the following:

- Inspecting and using emergency response equipment such as fire extinguishers and respirators;
- Calibrating, field testing, and using monitoring equipment;
- Using pumps and other devices in the handling of hazardous waste materials and instruction on how to shut down for emergency conditions;
- Inspecting and using decontamination equipment such as eyewash and showers;
- Precautions and procedures for container and tank filling and overflow prevention;
- Basic instructions in fire prevention and response;
- Instruction in spill prevention and response; and
- Basic instruction in planned and unplanned Facility shutdowns.

3.0 MAINTENANCE OF TRAINING RECORDS/COPY OF PERSONNEL TRAINING DOCUMENTS

Training records are maintained at the Facility and are managed by the Training Manager. These records include employee files containing employee name, position, job description, dates of instruction and training, and training certificates with general descriptions of the training received. Training records will be maintained by AA Sydcol until the Facility is closed.

APPENDIX A

TRAINING REVIEW REPORT